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State Data Privacy Laws

State	California (pre-2023)	California (starting Jan. 2023)	Virginia	Colorado	Connecticut	Utah	Iowa
Effective Date	December 16, 2020	January 1, 2023	January 1, 2023	July 1, 2023	July 1, 2023	December 31, 2023	January 1, 2025
Title	The California Consumer Protection Act (CCPA)	The California Privacy Rights Act of 2020 (CPRA)	Code of Virginia Code - Chapter 53. Consumer Data Protection Act (VCDPA)	Colorado Privacy Act (CPA)	Connecticut Data Privacy Act (CDPA)	Utah Consumer Privacy Act (UCPA)	SF 262 (no short title in bill)

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	CCPA	Virginia	Colorado	Connecticut	Utah	Iowa
Jurisdictional Threshold	Do business in California	Do business in Virginia or Produce products or services targeted to Virginia residents	Do business in Colorado or Produce or deliver commercial products or services intentionally targeted to Colorado residents	Do business in Connecticut or Produce products or services that are targeted to Connecticut residents	Do business in Utah or Produce or deliver commercial products or services intentionally targeted to Utah residents	Do business in Iowa or produces products or services that are targeted to Iowa residents
	And meet one of the following:	And meet either of the following	And meet either of the following	And meet either of the following	And meet either of the following	And meet either of the following
Revenue Threshold	Annual gross revenues greater than \$25M	N/A	N/A	N/A	Annual gross revenues greater than \$25M	N/A
Processing Threshold	Data of 50,000 or more consumers	Data of 100,000 or more consumers	Data of 100,000 or more consumers	Data of 100,000 or more consumers (excluding data only processed for payment)	Data of 100,000 or more consumers	Data of 100,000 or more consumers
Broker Threshold	At least 50% of revenue from selling consumers' personal data	Data of 25,000 or more consumers and At least 50% of revenue from sale of data	Data of 25,000 or more consumers and Derive revenue or receive discount from sale of data	Data of 25,000 or more consumers and Derive at least 25% of gross revenue from sale of data	Data of 25,000 or more consumers and At least 50% of revenue from sale of data	Data of 25,000 or more consumers and Derive over 50% of gross revenue from the sale of data

State Data Privacy Laws: Application Thresholds

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	CCPA	Virginia	Colorado	Connecticut	Utah	Iowa
Statutory Term for Protected Data	Personal Information	Personal Data	Personal Data	Personal Data	Personal Data	Personal Data
Protected Data Definition	Information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household	Any information that is linked or reasonably linkable to an identified or identifiable natural person	Any information that is linked or reasonably linkable to an identified or identifiable individual	Any information that is linked or reasonably linkable to an identified or identifiable individual	Any information that is linked or reasonably linkable to an identified or identifiable individual	Any information that is linked or reasonably linkable to an identifiable natural person.
Processing Definition	any operation or set of operations that are performed on personal information or on sets of personal information, whether or not by automated means.	any operation or set of operations performed, whether by manual or automated means, on personal data or on sets of personal data, such as the collection, use, storage, disclosure, analysis, deletion, or modification of personal data.	the collection, use, sale, storage, disclosure, analysis, deletion, or modification of personal data and includes the actions of a controller directing a processor to process personal data.	any operation or set of operations performed, whether by manual or automated means, on personal data or on sets of personal data, such as the collection, use, storage, disclosure, analysis, deletion or modification of personal data.	an operation or set of operations performed on personal data, including collection, use, storage, disclosure, analysis, deletion, or modification of personal data.	any operation or set of operations performed, whether by manual or automated means, on personal data or on sets of personal data, such as the collection, use, storage, disclosure, analysis, deletion, or modification of personal data.

State Data Privacy Laws: Personal Data

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	CCPA*	Virginia	Colorado	Connecticut	Utah	Iowa
Terms for data with heightened protections	Sensitive Personal Information	Sensitive Data	Sensitive Data	Sensitive Data	Sensitive Data	Sensitive Data
Race/ethnicity	Yes	Yes	Yes	Yes	Yes	Yes
Religious Beliefs	Yes	Yes	Yes	Yes	Yes	Yes
Sexual Orientation	Yes	Yes	Yes	Yes	Yes	Yes
Genetic Data	Yes	Yes	Yes	Yes	Yes	Yes
Biometric Data	Yes	Yes	Yes	Yes	Yes	Yes
Mental/Physical Health	Yes	diagnosis	condition or diagnosis	condition or diagnosis	condition, diagnosis, history	Yes
Children's Data	No	Yes	Yes	Yes	Yes	Yes
Citizenship/Immigration status	No	Yes	Yes	Yes	Yes	Yes
Philosophical Beliefs	Yes	No	No	No	No	No
Content of electronic communications	Yes	No	No	No	No	No
Financial Account Information	Yes	No	No	No	No	No
SSN/ID	Yes	No	No	No	No	No
Union membership	Yes	No	No	No	No	No
Geolocation	precise geolocation	precise geolocation	No	precise geolocation	specific geolocation	precise geolocation

State Data Privacy Laws: Sensitive Data

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	CCPA	Virginia	Colorado	Connecticut	Utah	Iowa
Business-to-business data	No	Yes	Yes	Yes	Yes	Yes
COPPA-related information	No*	Yes	Yes	Yes	Yes	Yes
DPPA-covered information	Yes	Yes	Yes	Yes	Yes	Yes
Employment-related data	No	Yes	Yes	Yes	Yes	Yes
FCRA-covered information	Yes	Yes	Yes	Yes	Yes	Yes
FERPA-covered information	No**	Yes	Yes	Yes	Yes	Yes
GLBA-covered data	Yes	Yes	Yes	Yes	Yes	Yes
HIPAA de-identified data	Yes	Yes	Yes	Yes	Yes	Yes
HIPAA protected health information	Yes	Yes	Yes	Yes	Yes	Yes

State Data Privacy Laws: Exempt Data

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