

U.S. State Privacy Law Comparison Matrix

19 State Laws in Effect · Applicability Framework · Common Requirements

v1.0 — 2026

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Effective Date: March 2026 · 19 State Laws in Effect · Updated Quarterly

This matrix summarizes the key requirements of enacted U.S. state comprehensive privacy laws as of March 2026. Laws marked with an asterisk (*) have sector-specific exemptions that may apply to professional services firms — particularly healthcare and financial data exemptions. This document is for educational purposes; consult legal counsel for jurisdiction-specific compliance obligations.

How to Determine If a Law Applies to You

Most state privacy laws apply based on: (1) the number of residents whose data you process annually, and/or (2) the percentage of revenue derived from selling personal data. Thresholds vary by state (see table). Professional services firms typically trigger applicability through the data volume threshold — a 50-person CPA firm serving clients across multiple states may easily process 100,000+ records annually.

Key exemptions to check: (1) B2B data exemptions (most laws exempt data processed in the context of a business-to-business transaction — review carefully), (2) Professional services exemptions (some states exempt data subject to professional privilege), (3) HIPAA-covered data (most state laws exempt data already governed by HIPAA), (4) GLBA-covered data (financial data regulated by GLBA may be exempt).

LAWS IN EFFECT AS OF MARCH 2026

State / Law	Effective	Threshold (Data Subjects / Revenue)	Key Consumer Rights	Enforcement	Notable for Professionals
California CPRA (amended CCPA)	Jan 1, 2023	100K consumers OR 25K consumers + 50%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/sharing, limit sensitive data	CA Privacy Protection Agency + AG. Up to \$7,500/intentional violation.	No general B2B exemption. Service providers have specific obligations. Sensitive data category includes SSNs.
Virginia VCDPA	Jan 1, 2023	100K consumers OR 25K consumers + 50%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling	AG only. Up to \$7,500/violation.	B2B exemption applies. HIPAA-covered data exempt. No private right of action.
Colorado CPA	Jul 1, 2023	100K consumers OR 25K consumers + 25%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling	AG only. Up to \$20,000/violation.	B2B exemption applies. HIPAA data exempt. Universal opt-out mechanism required.

State / Law	Effective	Threshold (Data Subjects / Revenue)	Key Consumer Rights	Enforcement	Notable for Professionals
Connecticut CTDPA	Jul 1, 2023	100K consumers OR 25K consumers + 25%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling	AG only. Up to \$5,000/violation	B2B exemption. HIPAA exempt. Nonprofit organizations generally exempt.
Utah UCPA	Dec 31, 2023	100K consumers OR 25K consumers + 50%+ revenue from selling data	Access, deletion, portability, opt-out of sale/targeted advertising	AG only. Up to \$7,500/violation	Narrower rights than most states. No correction right. HIPAA exempt.
Texas TDPSA	Jul 1, 2024	100K consumers (excluding transactions) OR 25K consumers + 50%+ revenue from selling	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling	AG only. Up to \$7,500/violation	Small business exemption. HIPAA data exempt. Sensitive data requires consent.
Florida FDPL	Jul 1, 2024	100K consumers OR 25K consumers + 50%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling	AG only. Up to \$50,000/violation (intentional).	Applies only to controllers with \$1B+ global revenue OR derive 50%+ revenue from internet advertising. Narrow applicability.
Montana CDPA	Oct 1, 2024	50K consumers OR 25K consumers + 25%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling	AG only. Up to \$7,500/violation	Lower threshold than most. HIPAA exempt. B2B exemption.
Oregon OCPA	Jul 1, 2024	100K consumers OR 25K consumers + 25%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling	AG only. Up to \$7,500/violation	Broad applicability. HIPAA data exempt. Notable: no B2B exemption in some provisions.
New Hampshire NHPDA	Jan 1, 2025	35K consumers OR 10K consumers + 25%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling	AG only. Up to \$10,000/violation	Lower threshold. HIPAA exempt. B2B exemption.
New Jersey NJDPA	Jan 15, 2025	100K consumers OR 25K consumers + 50%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling	AG only. Civil penalties TBD.	HIPAA exempt. B2B exemption. Broad sensitive data definition.
Tennessee TIDA	Jul 1, 2025	175K consumers OR 25K consumers + 25%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling	AG only. Up to \$7,500/violation	Unique: compliance with NIST Privacy Framework creates an affirmative defense.
Indiana ICDPA	Jan 1, 2026	100K consumers OR 25K consumers + 50%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling	AG only. Up to \$7,500/violation	HIPAA exempt. B2B exemption. Similar to Virginia framework.

State / Law	Effective	Threshold (Data Subjects / Revenue)	Key Consumer Rights	Enforcement	Notable for Professionals
Iowa IADPA	Jan 1, 2025	100K consumers OR 25K consumers + 50%+ revenue from selling data	Access, deletion, portability, opt-out of sale/targeted advertising	AG only. Up to \$7,500/violation	Narrow rights (no correction). HIPAA exempt. Most lenient enforcement of enacted laws.
Kentucky KPDA	Jan 1, 2026	100K consumers OR 25K consumers + 50%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling	AG only. Up to \$7,500/violation	Very similar to Virginia VCDPA. HIPAA exempt.
Nebraska NDPA	Jan 1, 2025	100K consumers OR 25K consumers + 25%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling	AG only. Up to \$7,500/violation	HIPAA exempt. B2B exemption applies.
Delaware DPDPA	Jan 1, 2025	35K consumers OR 10K consumers + 20%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling	AG only. Up to \$10,000/violation	Lower threshold. HIPAA exempt. No general B2B exemption.
Minnesota MNDPA	Jul 31, 2025	100K consumers OR 25K consumers + 25%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling/automated decision-making	AG only. Civil penalties TBD.	One of broadest laws. Includes right to opt out of automated decision-making. HIPAA exempt.
Maryland MOPIPL	Oct 1, 2025	35K consumers OR 10K consumers + 20%+ revenue from selling data	Access, deletion, correction, portability, opt-out of sale/targeted advertising/profiling	AG only. Up to \$10,000/violation	One of most restrictive. Prohibits "unnecessary" sensitive data collection. No HIPAA wholesale exemption.

DOES THIS LAW APPLY TO MY PROFESSIONAL SERVICES FIRM?

Use the following decision framework for each state law where you have clients or operations:

Question	If YES	If NO
Do you process personal data of residents of this state?	Continue to next question.	Law does not apply to your operations in this state.
Do you process personal data of 100,000+ state residents per year (use 35,000 for DE/NH/MD)?	Law likely applies. Verify exemptions.	Continue to next question.
Do you process 25,000+ state residents' data AND derive 25–50%+ of revenue from selling personal data (threshold varies)?	Law likely applies. Verify exemptions.	Law likely does not apply based on thresholds.
Does the HIPAA exemption apply to all data you process for this state's residents?	You may be exempt. Confirm with legal counsel — some states (Maryland) have narrow HIPAA exemptions.	Applicable law requirements apply in full.
Does a B2B or employee data exemption cover your data processing?	That portion of data may be exempt. Residual personal data (e.g., consumer data) is still covered.	Full law requirements apply.

COMMON REQUIREMENTS ACROSS ALL ENACTED LAWS

Despite variations, virtually all enacted state laws require:

- A privacy policy disclosing data collection, use, and sharing practices
- A mechanism for consumers to submit data access, deletion, and opt-out requests
- Response to consumer requests within the applicable deadline (30–45 days)
- Contracts (data processing agreements) with service providers who process personal data on your behalf
- A data protection assessment (or privacy impact assessment) for high-risk processing activities
- Reasonable security measures for personal data
- Honoring universal opt-out signals (required by CO, CT, and additional states are implementing)

Ready to Get Started?