**Core Privacy Issues Quick Look (Public) – as of 5/31/2024**

This Privacy Issues Quick Look is intended to compare how versions of the *Insurance Consumer Privacy Protection Model Law* (#674) and other NAIC Privacy Models incorporate key privacy issues addressed in comprehensive state privacy laws. **Exposed Version 1.2** was exposed for Public Comment on July 11, 2023. The **Industry Draft** incorporates industry’s comments to the Working Group’s revisions to Version 1.2 made after July’s exposure.

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|  | **Core Privacy Issues** | **Exposed Version 1.2** | **Model 670** | **Model 672** | **Industry Draft** |
| **Consumer Rights** | **Private right of action** |  | **X** |  |  |
| **Right to access** | **X** | **X** |  | **X** |
| **Right to correct** | **X** | **X** |  | **X** |
| **Right to delete** |  | **X** |  | **X** |
| **Right to opt out of certain processing** | **X** | **X** | **X** (provided in notice) | **X** (provided in notice) |
| **Right to portability** |  |  |  |  |
| **Right to opt out of sales** |  |  |  | **X** (right to opt out of disclosure of non-excepted nonpublic personal financial information about a consumer to nonaffiliated third party, and right to opt out of “targeted advertising”) |
| **Right to opt in for sensitive data processing** | **X** (provide in Notice) |  |  | **X** (must give authorization for disclosure of nonpublic personal health information) |
| **Business Obligations** | **Data minimization** | **X** |  |  | **X** |
| **Data retention** | **X** (includes provision for deletion after certain period, not framed as a consumer right to delete) |  |  | **X** (Licensee must develop policies and procedures for the secure disposal of NPI no longer necessary for business operations or other legitimate business purposes; generally broad exceptions to deletion of NPI requirement) |
| **Notice/transparency requirement** | **X** | **X** | **X** | **X** |
| **Opt-out** | **X** (provide option in Notice) |  | **X** | **X** |
| **Prohibition on discrimination/Nonretaliation** | **X** |  | **X** | **X** |
| **Purpose/processing limitation** |  |  |  | **X** |
| **Third-Party Service Provider Arrangements** | **X** (joint marketing agreement) |  | **X** | **X** |
| **Exceptions** | **GLBA exception** |  |  |  | **X** |
| **HIPAA Exception** | **X** |  | **X** (only with respect to provisions of Art. V of ML 672) | **X** |
| **Scope of processing exception** |  |  |  | **X** (exceptions for licensees processing less than 35,000 resident consumers) |
| **Other exceptions** |  |  |  |  |