

October 18, 2021

NAIC Privacy Protections (D) Working Group  
NAIC Central Office  
1100 Walnut Street, Suite 1500  
Kansas City, MO 64106

Via email: [lalexander@naic.org](mailto:lalexander@naic.org)

Dear Chair Amann, Vice Chair Kreiter, and Members of the Privacy Protections (D) WG:

Thank you for the opportunity to comment on Segment Four of the PPWG Policy Statement regarding the Right to Delete Information. I serve as a NAIC 2021 Consumer Representative in the NAIC Designated Consumer Participation Program.

A basic consumer right is to have any information collected on an individual to be correct and true. False information can often harm consumers in their personal affairs. Of course, this requires that consumers have access to information collected about them and it be available to the consumers to review for any false information that has been collected. If false information is found, the consumer must be able to inform the appropriate authority for modification/correction to insure that “truth wins out”. This necessitates deletion of false information and leads to my support for consumers to be able to delete misinformation.

I strongly support the concept that a consumer “**be forgotten**” once that consumer has no “active” relationship/contract with the insurer. What this means is that the insurer no longer can “share/sell” the consumer’s information to affiliates or third parties, nor can the insured market products to the consumer without their permission. This action doesn’t keep insurers from “holding” that consumer’s information in a separate account for legal purposes.

Respectively,

*Karrol Kitt*

Karrol Kitt, Ph.D.,  
2021 NAIC Consumer Representative