**Core Privacy Principles Quick Look – as of 7/3/2024**

This Privacy Issues Quick Look is intended to compare how NAIC Privacy Models incorporate key privacy principles addressed in comprehensive state privacy laws.

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|  | **Core Privacy Issues** | **Model 670** | **Model 672** | **Model 672+** |
| **Consumer Rights** | **Private right of action** | **X** |  |  |
| **Right to access** | **X** |  | **X** |
| **Right to correct** | **X** |  | **X** |
| **Right to delete** | **X** |  | **X** |
| **Right to opt out of certain processing** | **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** (must give authorization for disclosure of nonpublic personal health information) |
| **Business Obligations** | **Data minimization** |  |  | **X** |
| **Data retention** |  |  | **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** |
| **Opt-out** |  | **X** | **X** |
| **Prohibition on discrimination/Nonretaliation** |  | **X** | **X** |
| **Purpose/processing limitation** |  |  | **X** |
| **Third-Party Service Provider Arrangements** |  | **X** | **X** |
| **Exceptions** | **GLBA exception** |  |  | **X** |
| **HIPAA Exception** |  | **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** |  |  |  |