

WALK THROUGH AND **BI-WEEKLY COMMENT SCHEDULE**
FOR THE EXPOSURE DRAFT OF THE PRIVACY POLICY STATEMENT
DISTRIBUTED AUG. 26, 2021

The exposure draft of the privacy policy statement (Attachment Four in the Meeting Materials for the Aug. 30, 2021, Privacy Protections Working Group call) distributed Aug. 26 begins with the working group's charges and the Workplan it has followed since its first meeting in Nov. 2019.

Following the pandemic delay, six consumer data privacy protections identified as gaps per the analysis in this Workplan were discussed by the Working Group during meetings in November 2020, and, in March, May, June, and July of 2021.

Page 1 lists the six rights identified in the NAIC Member Adopted Strategy for Consumer Data Privacy Protections received through the Market Regulation and Consumer Affairs (D) Committee:

1. The Right to Opt-out of Data Sharing
2. Right To Opt-in of Data Sharing
3. The Right to Correct Information
4. The Right to Delete Information
5. The Right of Data Portability
6. The Right to Restrict the Use of Data

A format template with separate outline sections for each of the six consumer categories) has been posted, presented, and discussed at previous Working Group meetings.

Eighteen sets of comments received from members, regulators, and interested parties have been copied and pasted, in no particular order and without labels, into the format template for each of these rights.

Pages 2 and 3 lists the states that have adopted NAIC Models 670, 672 AND 668. Also noted are the consumer privacy protections addressed in each of these models.

Pages 3 and 4 include a review of privacy rights in GDPR and CCPA.

Pages 4 and 5 review state privacy legislation. links to comparison charts identify gaps in current state and federal laws and rules between GLBA and HIPAA as well as between NAIC Model Act 670 and the CCPA.

Since the combined material has been vetted by the Working Group in prior meetings, **please submit comments on the exposure draft to Lois Alexander**, NAIC staff support, at lalexander@naic.org as noted below as the Working Group will be meeting on a bi-weekly basis going forward:

Segment One: The Right to Opt-out of Data Sharing as addressed in pages 5 through 29 by **Sept. 7, 2021**, to be discussed at the Sept. 13, 2021, Working Group meeting.

Segment Two: The Right to Opt-in of Data Sharing as addressed in pages 29 through 32 by **Sept. 20, 2021**, to be discussed at the Sept. 27, 2021, Working Group meeting.

Segment Three: The Right to Correct Information as addressed in pages 32 through 36 by **Oct. 4, 2021**, to be discussed at the Oct. 11, 2021, Working Group meeting.

Segment Four: The Right to Delete Information as addressed in pages 36 through 39 by **Oct. 18, 2021**, to be discussed at the Oct. 25, 2021, Working Group meeting.

Segment Five: The Right of Data Portability as addressed in pages 39 through 46 by **Nov. 1, 2021**, to be discussed at the Nov. 8, 2021, Working Group meeting.

Segment Six: The Right to Restrict the Use of Data as addressed in pages 46 through 50 by **Nov. 15, 2021**, to be discussed at the Nov. 22, 2021, Working Group meeting.