

# **Proposed Privacy Principles for the NAIC Privacy Protections (H) Working Group**

## **NAIC Consumer Representatives**

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# Our Privacy Principles

- Centered on Licensee obligations
- Not Model Law wording
- Not intended to restrict ability to prevent criminal activity, fraud, material misrepresentation or nondisclosure or limit state regulators' ability to protect consumers' nonpublic personal information

# Privacy Principles

1. *You have the primary responsibility to protect the consumer nonpublic personal information (NPI) you collect.*
2. *Only ask the consumer for NPI needed to fulfill the consumer's business with you or to fulfill legal obligations.*

# Privacy Principles

- 3. Only collect nonpublic personal information that you can protect with concrete policies and procedures that state regulators can review.*
- 4. Only transfer nonpublic personal information to others who can protect it.*
- 5. Provide nonpublic personal information with the same level of protection that you would apply to your own confidential information.*

# Privacy Principles

- 6. Delete or de-identify NPI when it is no longer needed to process transactions necessary to fulfill the consumer's business with you or to fulfill legal obligations.*
- 7. Give consumers timely notice of any breach of their NPI and provide them with an actionable remedy for such breaches.*
- 8. Your obligations under these principles are not waivable.*