



Chairman Dereck Davis  
Room 231  
House Office Building  
Annapolis, Maryland 21401

**HB148:** Commercial Law - Personal Information Protection Act – Revision  
**Testimony on Behalf of:** MD|DC Credit Union Association  
**Position:** Support

Chairman Davis, Vice-Chair Dumais, and Members of the Committee:

The MD|DC Credit Union Association, on behalf of the 77 Credit Unions and their 2.2 million members that we represent in the State of Maryland, appreciates the opportunity to testify on this legislation. Credit Unions are member-owned, not-for-profit financial cooperatives whose mission is to educate and help members achieve financial success. We respectfully support this bill. The MD|DC Credit Union Association is in support of modifying the current security breach notification requirements.

The current law allows a business to conduct an internal investigation **prior** to 45-day window to notify consumers about a data breach begins. This standard is far too unpredictable because companies can take as long as they would like to conduct an internal investigation. The ambiguity in the current law is harmful to consumers. Removing the provision which allows the internal investigation to be conducted prior to the notification window beginning, will ensure, unless law enforcement directs the business to delay notification, that consumers are aware that their data may have been compromised within 45 days that the business discovers or is notified of the breach. Consumers should have knowledge of a potential compromise of their information as early as possible, and this bill will help accomplish the goal.

Please do not hesitate to contact me at 443-325-0774 or [jbratsakis@mddccua.org](mailto:jbratsakis@mddccua.org), or our VP of Advocacy, Rory Murray at [rmurray@mddccua.org](mailto:rmurray@mddccua.org) should you have any questions. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "John Bratsakis".

John Bratsakis  
President/CEO  
MD|DC Credit Union Association  
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