

STATE PRIVACY & SECURITY COALITION

February 09, 2024

Chair C.T. Wilson
Vice Chair Brian M. Crosby
House Economic Matters Committee
Room 231
House Office Building
Annapolis, MD 21401

Re: Comprehensive Privacy (HB 567) - Unfavorable

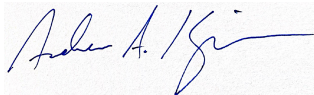
Dear Chair Wilson, Vice Chair Crosby, and Members of the Committee,

The State Privacy and Security Coalition (SPSC), a coalition of over 30 companies and six trade associations the retail, telecom, tech, automotive, and payment card sectors respectfully opposes HB 567 in its current form, but writes with general recommendations to HB 567 and the hope that this bill can be improved and in a place to be enacted in 2024. We appreciate that Maryland is taking a comprehensive approach to privacy legislation and respectfully request amendments that effectively balance consumer protections in Maryland with implementation and compliance by the business community in a way that aligns with the protections provided and obligations imposed by other states that have adopted similar frameworks.

We appreciate the diligence from and consideration by the sponsors regarding the concerns that we have communicated to them, and look forward to continuing our conversations. Our primary concerns stem around provisions that are either unique to this bill (they do not appear in any other US privacy law) or provisions that are in all other laws which do not currently appear in HB 567.

We believe that working from a comprehensive, interoperable framework that provides strong privacy protections for consumers, clear and robust obligations for businesses, while still maintaining interoperability with other states, will provide the most seamless and modern approach to privacy for Maryland consumers. After a number of years of consideration by this legislature, we are hopeful that HB 567 represents a path forward that will put Maryland with the growing number of states with a comprehensive privacy framework.

Respectfully submitted,



Andrew A. Kingman
Counsel, State Privacy & Security Coalition