



Chairwoman Delores Kelley
3 East
Miller Senate Office Building
Annapolis, MD 21401

SB112: Commercial Law – Personal Information Protection Act – Revisions
Testimony on Behalf of MD|DC Credit Union Association
Position: Support

Chairwoman Kelley, Vice-Chair Feldman and Members of the Committee:

On behalf of the MD| DC Credit Union Association and the 77 Credit Unions and their 2.2 million members that we represent in the State of Maryland, we appreciate the opportunity to testify on this legislation. Credit Unions are member-owned, not-for-profit financial cooperatives whose mission is to promote thrift and provide access to credit for provident and productive purposes for our members. 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, or our VP of Advocacy, Rory Murray at rmurray@mddccua.org should you have any questions. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "John Bratsakis". The signature is fluid and cursive, with the first name "John" being the most prominent part.

John Bratsakis
President/CEO
MD|DC Credit Union Association
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