

Prince Georges Chamber Testimony_HB 1365.pdf

Uploaded by: Alex Austin

Position: FAV

February 27, 2025

Chairman C.T. Wilson
House Economic Matters Committee
230 Taylor House Office Building
Annapolis, Maryland 21401

Dear Mr. Chairman and Members of the Committee:

On behalf of the Prince George's Chamber of Commerce, I am writing to express our support for HB 1365, which provides a small but important clarification to the Maryland Online Data Privacy Act of 2024. We are confident that this legislation will ensure small businesses and entrepreneurs across the state maintain access to the tools they need to succeed.

HB1365 shields local businesses and innovators from needlessly higher standards than their counterparts across the country, while maintaining strong data privacy for Marylanders. Without this bill, Maryland would be burdened with stricter standards than any other state in the country, imposing unnecessary limitations on digital advertising and online resources and depriving businesses of the tools they need to succeed in the global marketplace.

The legislation also offers a workable framework for small businesses and entrepreneurs who have leaned into digital marketing and targeted advertising tactics to attract and retain customers. We are particularly supportive of the clarity this bill provides to preserve the use of these resources, while still protecting customers' personal data.

We look forward to working with you to pass this critical piece of legislation for the Maryland business ecosystem.

Sincerely,

Alexander K. Austin

Alexander K. Auston

SPSC - MD HB 1365 - Testimony 02.26.25.pdf

Uploaded by: Andrew Kingman

Position: FAV

February 26, 2025

The Honorable C. T. Wilson, Chair
The Honorable Brian M. Crosby, Vice Chair
Economic Matters Committee
230-31 Taylor House Office Building
Annapolis, Maryland 21401

RE: HB 1365 - Online Data Privacy - Limits on Data Collection

Dear Chair Smith, Vice Chair Waldstreicher, and Members of the Committee:

The State Privacy & Security Coalition (SPSC), a coalition representing over 30 companies and six trade associations across sectors including retail, telecommunications, technology, automotive, healthcare, and payment cards, appreciates the opportunity to provide feedback on Maryland House Bill 1365 - *Online Data Privacy, Limits on Data Collection*.

We firmly believe the proposed amendment to the Maryland Online Data Privacy Act's (MODPA) data minimization standard represents a critical first step in bringing Maryland in alignment with the widely accepted privacy framework established by Europe's General Data Protection Regulation (GDPR), California Consumer Protection Act, and the Connecticut framework—collectively covering over 610 million consumers. The amendment protects consumers by ensuring businesses collect only data that is “**adequate, relevant, and reasonably necessary**” for the specific purposes disclosed to them. Companies, therefore, are prevented from hoarding excessive consumer information, reducing privacy risks and the potential for data misuse.

By contrast, MODPA's current, untested approach to data minimization creates uncertainty and confusion, the burden for which will rest on businesses to define what data is “**reasonably necessary and proportionate to provide or maintain a specific product or service requested by the consumer to whom the data pertains**.” This standard could inadvertently limit accessibility and user experience by restricting companies from personalizing services, implementing adaptive features, and improving product functionality. Tools that enhance accessibility—such as voice recognition, screen readers, and adaptive interfaces for individuals with disabilities—often rely on collected data to function effectively. If companies must prove that such data is “**reasonably necessary and proportionate**” to provide the product or service rather than “**adequate, relevant, and reasonably necessary**”, many may disable or scale back accessibility features to avoid compliance risks. The result would be fewer essential digital tools available to vulnerable populations which ultimately undermines inclusivity.

Additionally, the “reasonably necessary and proportionate” standard could reduce consumer choice and diminish service quality, as businesses modify operations to comply with Maryland's novel necessity threshold. Many free or low-cost services rely on transparent, opt-in data processing to sustain their business models while respecting consumer privacy. Restricting even limited, relevant data collection may lead to discontinued services or reduced functionality. Maryland consumers could lose access to personalized experiences, loyalty programs, security enhancements, and other features that improve digital interactions while maintaining strong privacy protections.

To balance privacy, security, accessibility, and service quality, Maryland should adopt the widely accepted “adequate, relevant, and reasonably necessary” standard. This approach ensures consumers retain meaningful privacy rights while continuing to benefit from safer, more accessible, and higher-quality digital services. A well-established necessity threshold also strengthens the foundation for regulatory enforcement, benefiting both consumers and businesses.

* * * *

We would be happy to answer any questions and look forward to continued conversations.

Respectfully submitted,



Andrew A. Kingman
Counsel, State Privacy & Security Coalition

HB1365 -- Commercial Law - Online Data Privacy - L

Uploaded by: Brian Levine

Position: FAV



House Bill 1365 -- Commercial Law - Online Data Privacy - Limits on Data Collection
House Economic Matters Committee
March 4, 2025
Support

The Montgomery County Chamber of Commerce (MCCC), the voice of business in Metro Maryland, supports House Bill 1365 -- *Commercial Law - Online Data Privacy - Limits on Data Collection*.

House Bill 1365 provides a small but important clarification to the *Maryland Online Data Privacy Act of 2024*. MCCC is confident that this legislation will ensure small businesses and entrepreneurs across the state maintain access to the tools they need to succeed.

This bill protects local businesses and innovators from facing unnecessarily stringent standards compared to their counterparts nationwide, while still upholding robust data privacy for Maryland residents. Without this bill, Maryland would be subject to the strictest standards in the country, imposing unnecessary limitations on digital advertising and online resources and depriving businesses of the tools they need to succeed in the global marketplace.

House Bill 1365 also provides a practical framework for small businesses and entrepreneurs who rely on digital marketing and targeted advertising to attract and retain customers. MCCC is particularly supportive of the clarity this bill provides to preserve the use of these resources while still protecting customers' personal data.

For these reasons, the Montgomery County Chamber of Commerce supports House Bill 1365 and respectfully requests a favorable report.

The Montgomery County Chamber of Commerce (MCCC), on behalf of its members, champions the growth of business opportunities, strategic infrastructure investments, and a strong workforce to position Metro Maryland as a premier regional, national, and global business location. Established in 1959, MCCC is an independent, non-profit membership organization.

*Brian Levine | Vice President of Government Affairs
Montgomery County Chamber of Commerce
51 Monroe Street | Suite 1800
Rockville, Maryland 20850
301-738-0015 | www.mcccmd.com*

HB 1365_Del Harrison_FAV.pdf

Uploaded by: Delegate Andrea Harrison

Position: FAV



THE MARYLAND HOUSE OF DELEGATES
ANNAPOLIS, MARYLAND 21401

Written Testimony on HB 1365 – Commercial Law – Online Data Privacy – Limits on Data Collection

March 4, 2025

Good afternoon, Chair Wilson, Vice Chair Crosby, and members of the Economic Matters Committee,

I am Delegate Andrea Harrison, and I am here to present HB 1365 Online Data Privacy – Limits on Data Collection. This bill is aimed at limiting the collection of personal data to what is adequate, relevant, and reasonably necessary for the purposes for which the data is processed, as disclosed to consumers, by persons or entities that handle consumer (personal) data.

House Bill 1365, which seeks to bring the data minimization standard in the comprehensive bill passed last session in line with the data minimization framework found in the European General Data Protection Regulation, as well as the other 18 states - including California, Oregon, Rhode Island, New Jersey, and Delaware - that have also passed comprehensive privacy frameworks which now cover over 100 million consumers in the United States.

Certainly, this provision in Maryland has garnered attention as a national leader when it first passed and has been lauded as a premier. However, as businesses have looked at how to implement this, my understanding is that this novel approach is creating significant confusion and, there is concern about how the consumer online and app experience for Marylanders could likely to be increasingly negative and could even lead to consumer consent fatigue.

Current language in the law, which goes into effect in October of this year, requires that businesses collect and process only the data that is “reasonably necessary to provide the specific product or service requested by the consumer.”

While on paper this makes sense as it is certainly the goal to protect our resident’s personal data, in practice, what I am hearing is that this language may well require that businesses create new pop-up, click-through boxes on their websites and apps just for Maryland residents to satisfy the “requested by the consumer” standard. Due to the way this law is structured, these click-through boxes cannot be framed as requests for consent, because that is not permitted in this context, but other compliance mechanisms to document that the consumer wants or has requested or is OK with these types of updates or new product requests. Further, adding these additional “consent boxes” could lead residents to simply ‘click through’ and they may not actually read what they are consenting to because there may be so many consent boxes that would be required under this regulation. I bet many of us find them annoying to deal with (as is) when we just want to get to the page or app we’re trying to use. As a result, we may not actually be providing more privacy, but rather simply providing more consent and because

we are frustrated, we are not looking at what we are consenting to-because the letter of the law has been met and not necessarily the spirit of the law. This underscores the discussion last session where a number of comments were made to the effect that privacy policies are effectively useless because businesses can put whatever they want in them, and then so long as they are doing those activities, they are safe from enforcement and can proceed with invasive methods of data collection. This does not necessarily protect consumer data privacy.

The “requested by” standard also turns off routine and non-harmful data flows, which prevents businesses from making systematic and routine updates to their products and services for Marylanders, and would not allow businesses to suggest product recommendations for new products and services that the consumer did not “specifically request,” but that the business believes the consumer would want or would like to consider. And again, we do not know exactly how this will look because no other state in the country has moved in this direction. Instead, since Maryland has taken this path, potentially at the expense of the consumer experience, our neighbors in Virginia and Washington DC may have access to better, or newer products and services than our residents.

Maryland’s privacy law already has a provision that says if you do anything different than what is “adequate, relevant and reasonably necessary.” But simply putting an activity in your privacy policy that is designed to be vaguely worded, and misleading is in fact a violation of the language that HB 1365 proposes.

I also want to state that the more that we go away from using clear statements in privacy policies as our basic enforcement standard, and the more we move to subjective judgments about what has been “requested” by the consumer for a “specific” product or service, the less clear it will be for those enforcers to determine who is violating this law and who is working to comply with it in good faith.

At the end of the day, Maryland is not - and should not be - bound by what other states have done or the prevailing views on a particular public policy issue. HB 1365 would simply advance Maryland's standard to a standard that is more in line with what the rest of the world and what the rest of our country is doing. In my view, it is important that our residents and constituents do not fall victim to consent fatigue, have the same privacy protections as other states, and the same access to goods and services. Thank you and I respectfully request a favorable report on HB 1365.

HB1365_FAV_MTC_Commercial Law - Online Date Privac

Uploaded by: Drew Vetter

Position: FAV



House Economic Matters Committee

March 4, 2025

House Bill 1365 – *Commercial Law – Online Data Privacy – Limits on Data Collection*

POSITION: SUPPORT

The Maryland Tech Council (MTC), with over 800 members, is the State's largest association of technology companies. Our vision is to propel Maryland to be the country's number one innovation economy for life sciences and technology. MTC brings the State's life sciences and technology communities into a united organization that empowers members to achieve their goals through advocacy, networking, and education. On behalf of MTC, we submit this letter of support for House Bill 1365.

The Maryland General Assembly passed the Maryland Online Data Privacy Act (MODPA) during the 2024 Session last year. The MTC and our members were engaged in the discussions on that bill throughout Session and believe that the final product represents an important step forward in protecting the personal data of Maryland residents. For the most part, MODPA is in line with other online data privacy laws passed in states like Connecticut, California, and in Europe.

However, the MODPA section that is the subject of this bill makes Maryland an outlier compared to other online data privacy laws. MTC raised this issue last year and appreciates the opportunity to address it again. Adopting the "adequate, relevant, and reasonably necessary" standard proposed by this legislation mirrors the standard in Connecticut, California, and Europe's General Data Protection Regulation. This standard works to prevent companies doing business online from collecting excessive and irrelevant information about consumers.

MODPA adopts a different "strictly necessary" standard to provide a "specific product or service" requested by the consumer. We are concerned that adopting a more stringent standard compared to other states disadvantages small Maryland tech companies, who will be innovating in a more restrictive online environment than companies in other states. Furthermore, smaller Maryland-based companies are disadvantaged by having different rules for Maryland-based customers and their customers based in other states. We support reasonable consumer protections, but believe we should strive for consistency with other states when it is reasonable.

MTC is also concerned that if Maryland keeps the current standard, Maryland consumers' internet experiences will differ from those in other states. This may impact accessibility, user experience, and personalization, which many consumers like and rely upon. We believe the standard proposed by this bill strikes the proper balance between strong privacy protections and maintaining personalized and functional online experiences.

For these reasons, we request a favorable report.

For more information call:

Andrew G. Vetter

J. Steven Wise

Danna L. Kauffman

Christine K. Krone

410-244-7000

[MD] HB 1365_datamin_TechNet.pdf

Uploaded by: margaret durkin

Position: FAV



TECHNET
THE VOICE OF THE
INNOVATION ECONOMY

TechNet Mid-Atlantic | Telephone 717.585.8622
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February 28, 2025

The Honorable C.T. Wilson
Chair
House Economic Matters Committee
Maryland House of Delegates
230 Taylor House Office Building
6 Bladen Street, Annapolis, MD 21401

RE: HB 1365 (Harrison) - Commercial Law - Online Data Privacy - Limits on Data Collection – Favorable

Dear Chair Wilson and Members of the Committee,

On behalf of TechNet, I'm writing to share our comments on HB 1365.

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50-state level. TechNet's diverse membership includes dynamic American businesses ranging from startups to the most iconic companies on the planet and represents over 4.5 million employees and countless customers in the fields of information technology, artificial intelligence, e-commerce, the sharing and gig economies, advanced energy, transportation, cybersecurity, venture capital, and finance. TechNet has offices in Austin, Boston, Chicago, Denver, Harrisburg, Olympia, Sacramento, Silicon Valley, Tallahassee, and Washington, D.C.

Consumers expect, and should expect, to trust the tech sector to protect their data. Our member companies consistently place a high priority on consumer privacy, and the technology industry is committed to privacy and security. As part of that, transparency and the responsible use of data are pillars of the tech sector. TechNet will advocate for a federal privacy standard that expressly preempts state laws and brings uniformity to all Americans regardless of where they live, encourages innovation, and ensures that consumers' privacy is protected consistent with reasonable expectations and industry standards.

Last session, and in prior years, TechNet worked with the Maryland General Assembly to craft a thoughtful approach to comprehensive data privacy. In the absence of a federal standard, lawmakers should look to interoperable, comprehensive state legislation. To be clear, TechNet doesn't intend to change the overall privacy framework with this advocacy. Rather, we are focused on this critical and important change that will provide a more positive online experience for

Maryland consumers. As such, we believe that HB 1365 addresses and improves upon the current privacy laws by providing for “adequate, relevant, and reasonably necessary” standards related to data collection.

There are unintended consequences of the current standard “strictly necessary”, including businesses limiting personalization services and accessibility features. Should the current standard remain, we are concerned that businesses may limit their risks by discontinuing or reducing certain services or features. Examples of these limits could include not being able to introduce features such as email improvements, because a consumer doesn’t specifically request it, using mapping or geolocation to help facilitate everyday services like ridesharing because it is not “strictly necessary” for the consumer’s use of the product, and reaching existing customers or finding new ones via online advertising,

The changes in HB 1365 will bring Maryland into better alignment with existing privacy laws, while providing meaningful privacy rights for consumers. Thank you for your work on this important issue and please let me know if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Margaret Durkin". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Margaret Durkin
TechNet Executive Director, Pennsylvania & the Mid-Atlantic

Google letter of support for MD HB 1365.pdf

Uploaded by: Ron Barnes

Position: FAV



25 Massachusetts Ave., NW
Washington, DC 20001
Phone: 202-346-1100

February 27, 2025

Chairman C.T. Wilson
House Economic Matters Committee
230 Taylor House Office Building
Annapolis, Maryland 21401

Dear Mr. Chairman and Members of the Committee:

Google writes to express our support for HB 1365, which aims to reduce regulatory burdens and promote innovation. We believe this legislation is a positive step towards creating a more streamlined and predictable environment for businesses of all sizes to thrive in Maryland.

Specifically, we appreciate the bill's endorsement of data minimization rules that require companies to disclose the purposes for which data is processed and to ensure that such processing is adequate, relevant, and reasonably necessary for such purposes. This approach aligns with the consensus approach to data minimization that has been implemented in strong privacy laws across nearly half of the country.

Clear and predictable legal standards, as the bill seeks to create, are crucial for companies like Google to invest in cutting-edge technologies and bring them to market efficiently for the countless Maryland residents and businesses who rely on our products and services. Each day Maryland consumers and businesses choose to use services such as Search, Gmail, YouTube, Maps, and Ads to help them find what they're looking for, connect, and grow. The bill will help ensure we can continue to improve these services in ways that they expect, while safeguarding their privacy rights.

We are particularly supportive of the bill's efforts to achieve these changes in a manner consistent with other state laws, striving for harmonization. We believe that a cohesive framework across states, while respecting state-level needs, is essential for a truly innovative national marketplace.

We look forward to working with you and your colleagues to advance this important legislation.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ron Barnes".

Ron Barnes
Head of State Legislative Affairs

Eric Null Testimony Opposed MD HB 1365.pdf

Uploaded by: Ereic Null

Position: UNF



**Testimony of Eric Null, Co-Director, Privacy & Data Program,
Center for Democracy & Technology, before the
Maryland House of Delegates Economic Matters Committee
Hearing Scheduled March 4, 2025
HB 1365 — Oppose
February 28, 2025**

About CDT

The Center for Democracy & Technology (CDT) is a nonprofit, nonpartisan organization fighting to advance civil rights and civil liberties in the digital age. For 30 years, CDT has worked on many issues touching on various aspects of privacy, civil rights, and related issues, both at the state and federal level. Privacy issues have been central to CDT's work since its founding.

We Oppose Weakening the Data Minimization Standard in the Maryland Online Data Privacy Act

HB 1365 proposes a simple, but fundamental, change to the Maryland Online Data Privacy Act (MODPA): replace the language limiting the collection of data to what's reasonably necessary to provide a product or service, with the weaker, more industry-friendly requirement that data collected be "adequate, relevant, and reasonably necessary in relation to the purposes for which the data is processed, as disclosed to the consumer." This change is a regression in privacy protections and should be rejected outright.

Data minimization ensures companies collect only data that is necessary to provide the product or service an individual requested. Data minimization requirements place the privacy-protecting burden primarily on companies that collect and exploit the data, rather than on the already overburdened consumer. U.S. privacy law has developed primarily through the Federal Trade Commission's authority to [prevent "deceptive" practices](#), which has resulted in protections focused on when companies mislead people. For years, however, [most people have agreed](#) that [notice-and-consent has failed](#), in large part because we know that people [do not read or understand laborious](#), labyrinthian privacy policies.

Narrowing the categories of data that companies can collect is important because of the [variety of privacy-based harms](#) that come about simply from companies collecting and hoarding massive amounts of data: becoming a larger target for hackers or unauthorized access, breaches of that data that result in further downstream harms like identity theft, and subsequent use of data that is unknown or secretive, such as selling the data to third parties that compile detailed individual profiles and use that data (particularly sensitive data) for targeted advertisements.

Reducing data collected also protects against another significant harm: law enforcement access to data. Any data that a company has access to, law enforcement also has access. The Supreme Court's decision in *Dobbs v. Jackson Women's Health Organization* raised the

salience of this concern, as people realized that any data that could be used to identify whether a person sought or received an abortion (location data, communications data, among [many others](#)) could be accessed by law enforcement.

Last year, Maryland took an important step to address this fundamental problem and rejected the industry-friendly model that continues to place the privacy protection burden on consumers. MODPA limited the collection of data in the first instance, and placed that burden on the companies—the party that primarily benefits from the collection, processing, and transfer of consumer data. It did so by creating two tiers of minimization, limiting collection of non-sensitive data to what is “reasonably necessary” to provide the product or service, and limiting collection of sensitive data to what is “strictly necessary” to provide the product or service.

HB 1365, which seeks to amend the standard for non-sensitive data, would subvert these limits, place more burdens on the already-overwhelmed Marylander, and provide no benefit to the consumer overall. The only beneficiaries of this type of change would be companies, who would be free to continue listing every possible type of non-sensitive data collected in a long privacy policy that no one will read.

If anything, the minimization limits should be strengthened—they should apply not just to collection of data, but also the processing and disclosure of that data. Just because a company legitimately collects certain data to provide a service should not entitle them to disclose or sell that data for unrelated purposes.

We strongly urge the Committee to vote no on HB 1365, and on any other bill that further weakens Maryland’s strong data minimization standards.

HB 1365 CPD Unfavorable.pdf

Uploaded by: Hanna Abrams

Position: UNF

CAROLYN A. QUATTROCKI
Chief Deputy Attorney General

LEONARD J. HOWIE III
Deputy Attorney General

CARRIE J. WILLIAMS
Deputy Attorney General

ZENITA WICKHAM HURLEY
Chief, Equity, Policy, and Engagement



STATE OF MARYLAND
OFFICE OF THE ATTORNEY GENERAL

ANTHONY G. BROWN
Attorney General

WILLIAM D. GRUHN
Division Chief

PETER V. BERNS
General Counsel

CHRISTIAN E. BARRERA
Chief Operating Officer

HANNA ABRAMS
Assistant Attorney General

March 4, 2025

TO: The Honorable C.T. Wilson, Chair
Economic Matters Committee

FROM: Hanna Abrams, Assistant Attorney General

RE: House Bill 1365 – Commercial Law – Online Data Privacy – Limits on Data
Collection (UNFAVORABLE)

The Consumer Protection Division of the Office of the Attorney General opposes House Bill 1365 (“HB 1365”), sponsored by Delegate Andrea Fletcher Harrison. House Bill 1365 asks the legislature to reconsider the Maryland Online Data Privacy Act’s (“MODPA”) data minimization language before the law has even gone into effect. MODPA’s data minimization language is an important privacy protection that was intended to ensure that a consumer’s personal data is used only for the purposes for which it was collected.

After six years of considering various forms of privacy legislation, the General Assembly passed MODPA in 2024. MODPA provides consumers with certain rights vis-à-vis their personal data and limits the personal data that companies can collect. Because these systems are complex, businesses began taking steps to ensure compliance last year. Altering MODPA’s standards while companies are in the process of implementing the existing guidelines penalizes law-abiding companies.

Moreover, by focusing on the company’s privacy disclosure rather than the purpose for which the consumer engages with the business, the bill would negate the protection that MODPA affords consumers. Since the proposed language is tied to the purpose “as disclosed to the consumer,” it allows businesses to draft lengthy, and ultimately meaningless privacy disclosures that “disclose” any and all potential uses of the consumer personal data. In contrast, MODPA’s existing language limits the collection of personal data to what is reasonably necessary and proportionate to provide the product or service “requested by the consumer.” Md. Code, Com. Law § 14-4707.

Accordingly, we urge the Economic Matters Committee to issue an unfavorable report on HB 1365.

cc: Members, Economic Matters Committee
The Honorable Andrea Fletcher Harrison

HB1365-EPIC-ConsumerReports-UNFAV-Feb2025.pdf

Uploaded by: Kara Williams

Position: UNF



February 28, 2025

The Honorable C.T. Wilson
House Economic Matters Committee
Room 231
House Office Building
Annapolis, MD 21401

Re: *S.B. 1365 (Commercial Law - Online Data Privacy - Limits on Data Collection) - OPPOSE*

Dear Chair Wilson and Members of the Committee:

EPIC and Consumer Reports write in opposition to HB 1365, a bill that would undo the strong pro-consumer work this Committee and the Maryland General Assembly did last year in passing the Maryland Online Data Privacy Act.

The Maryland Online Data Privacy Act requires that companies limit their collection of personal data to what is reasonably necessary to provide the product or service the consumer requested. This aligns companies' data practices with what consumers expect.

HB 1365 would strike that important data minimization rule and replace it with a requirement that companies simply limit their collection of personal data to what is reasonably necessary "in relation to the purposes for which such data is processed, *as disclosed to the consumer.*"

This change would mean the Maryland Online Data Privacy Act would not meaningfully limit what data companies can collect or what they can do with that data — it would merely require that companies disclose these details in their privacy policies, which consumers rarely read or understand. In fact, it incentivizes companies to list as many purposes as possible, and as broadly as possible, to cover every conceivable reason they would ever want to collect our data for.

This does little to change the broken status quo. The Maryland General Assembly decided last year to encourage companies to innovate on privacy and find more privacy-protective ways of doing business. This bill would reverse that.

Industry lobbyists will argue that HB 1365 is needed to make Maryland's law consistent with other states. But consistent regulations shouldn't mean weak regulations. And indeed, numerous states are now looking to Maryland's standard in proposed privacy legislation. Connecticut, long cited by industry as the model other states should follow, had a hearing this week on a bill sponsored by the Connecticut Data Privacy Act's original sponsor, Senator James Maroney, that would update

Connecticut’s privacy law to match Maryland’s data minimization standard.¹ Legislation with similar standards has also been introduced in Massachusetts,² Vermont,³ Washington State⁴, and New Mexico.⁵

HB 1365’s gutting of one of the most important provisions in the Maryland Online Privacy Act would make Marylanders less safe online. EPIC and Consumer Reports encourage this Committee to give an unfavorable report to HB 1365.

Thank you for the opportunity to testify. We are happy to be a resource to the Committee on these issues.

Sincerely,

Caitriona Fitzgerald
Deputy Director, EPIC

Kara Williams
Law Fellow, EPIC

Matt Schwartz
Policy Analyst, Consumer Reports

¹ CT S.B. 1356 (2025).

² MA HD.2135 (2025).

³ VT H.208 (2025).

⁴ WA HB 1671 (2025).

⁵ NM SB 420 (2025).