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Via email: kdewey@leg.state.vt.us

Senator Michael Sirotkin, Chair Senate Committee on Economic Development, Housing, and General Affairs Vermont State House 115 State Street Montpelier, VT 05633-5301

Re: H764 Support

Dear Senator Sirotkin:

I am writing from the World Privacy Forum. We are a non-profit, non-partisan public interest research group that focuses on data privacy and data governance issues. We have published numerous privacy studies, and have been active in the data privacy field since 2002. In particular, I have spent many years studying and researching data brokers and their activities. I have written several large research reports, and have testified 3 times before Congress regarding data brokers, beginning in 2011.

Last summer, I was pleased to attend in person the public meetings the Vermont Attorney General's office held in regard to data brokers. In following the developments during this past year in Vermont regarding legislation, I have been pleased to see Vermont take a modest, incremental approach to legislation.

The version of H764 that passed the House represents a fair compromise that affords consumers important rights, such as data breach notification, and affords businesses the flexibility to innovate and grow. As such, I write in favor of bill H764.

Of particular interest to me is the incremental but important protections consumers would receive in H764. The proposed protections are reasonable and are worthwhile. They do represent a compromise from all that I would like to see, but they represent an important and desirable first step. Consumers' ability to freeze and unfreeze credit reports without a fee is a key financial protection tool for those who are victims of identity theft and the

multiple data breaches most of us experience now. Currently, data brokers have extraordinary volumes of data about consumers; it is best practice and good knowledge governance to require data brokers to adopt an information security program with appropriate technological, physical, and administrative safeguards. And prohibiting acquisition of personal information with intent to commit wrongful acts such as stalking, harassment, fraud, identity theft, or discrimination is a reasonable and important addition.

I urge you to support H764 and provide incremental, reasonable improvements for a safer digital ecosystem for consumers.

Sincerely,

Pam Dixon

Executive Director

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