

May 5, 2026

Sen. Alison Clarkson  
Committee on Economic Development, Housing and General Affairs  
Vermont Senate  
115 State Street  
Montpelier, VT 05633

***RE: NAMIC Further Testimony on H.211***

Chair Clarkson, esteemed Members of the Committee:

The National Association of Mutual Insurance Companies (NAMIC) is grateful for the opportunity to provide further testimony on H211, in light of recent amendments.

NAMIC is the foremost trade association representing the property/casualty insurance industry. Serving more than 1,300 member companies - including local and regional insurers as well as some of the nation's largest carriers - NAMIC members collectively write \$467 billion in annual premiums, representing 61% of the homeowners' and 53% of the automobile insurance markets. For more than 130 years, NAMIC has been the leading voice advancing public policy solutions and regulatory frameworks that promote a strong, competitive market and protect our members and their policyholders.

**Previous NAMIC Testimony**

On April 6, during this Committee's second hearing on H211, NAMIC provided [written](#) and oral testimony urging the Committee to adopt explicit exemptions for entities and data already subject to the Gramm-Leach-Bliley Act (GLBA) and Vermont's insurance regulatory framework. NAMIC made that request in the belief that those exemptions would preserve single and certain standards as they pertain to privacy and data-use frameworks.

**New GLBA Language Misses the Mark**

As the Committee has considered the bill in consequent hearings, an [amendment](#) has been put forward that relates to GLBA data. That amendment, unfortunately, has not assuaged NAMIC's concerns with the bill. At present, the GLBA reference appears in Section 2446(c)(3)(B)(i). That provision is narrowly focused on circumstances where a data broker denies a consumer's request for deletion. In practical effect, it simply permits data brokers to deny deletion requests when the data at issue is covered by GLBA.



As a result, GLBA data and entities remain subject to the rest of the bill. The GLBA language therefore functions less as an exemption and more as a justification for denying deletion requests. It does not remove GLBA-regulated entities or data from the scope of the bill; it only limits one specific consumer right.

That approach does not resolve NAMIC's concerns. NAMIC's position is not limited to the deletion provisions. Rather, NAMIC believes that entities and data already regulated under the GLBA should be excluded from the requirements of this bill as a whole, in order to preserve single and certain standards and to avoid the unintended consequences outlined in our previous testimony.

Accordingly, we respectfully urge the Committee to include a clear, standalone provision stating that the entirety of H211 does not apply to GLBA-regulated entities or GLBA-covered data. This would provide clarity and certainty and ensure that GLBA entities are fully removed from the bill's requirements, rather than carved out only in isolated sections.

Thank you for your consideration.

Sincerely,

*Sean McLaughlin*

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