



May 16, 2023

Representative Matt Ritter
Speaker of the Connecticut House of Representatives
Legislative Office Building, Room 4106
Hartford, CT 06106-1591

Representative Jason Rojas
Majority Leader of the Connecticut House of Representatives
Legislative Office Building, Room 4100
Hartford, CT 06106-1591

Representative Vincent Candelora
Minority Leader of the Connecticut House of Representatives
Legislative Office Building, Room 4200
300 Capitol Avenue
Hartford, CT 06106

RE: Oppose SB 1058

Dear Speaker Ritter, Majority Leader Rojas, and Minority Leader Candelora:

On behalf of the advertising industry, we write to **oppose SB 1058**'s proposal to make "precise geolocation data" personal information subject to Connecticut's breach notification statute.¹ We and the companies we represent, many of whom do substantial business in Connecticut, strongly support companies' efforts to employ reasonable technical and organizational measures to prevent data breaches. However, SB 1058 would make Connecticut a significant outlier in comparison to breach notification requirements in other states without providing meaningful supplemental data breach protections for consumers. **We therefore respectfully ask you to remove from SB 1058 the proposed addition of "precise geolocation data" to the definition of the term "personal information" in Connecticut's breach notification statute.**

As the nation's leading advertising and marketing trade associations, we collectively represent thousands of companies across the country. These companies range from small businesses to household brands, advertising agencies, and technology providers. Our combined membership includes more than 2,500 companies that power the commercial Internet, which accounted for 12 percent of total U.S. gross domestic product ("GDP") in 2020.² Our group has

¹ Section 4, Connecticut SB 1058 (Gen. Sess. 2023), located [here](#).

² John Deighton and Leora Kornfeld, *The Economic Impact of the Market-Making Internet*, INTERACTIVE ADVERTISING BUREAU, 15 (Oct. 18, 2021), located at https://www.iab.com/wp-content/uploads/2021/10/IAB_Economic_Impact_of_the_Market-Making_Internet_Study_2021-10.pdf (hereinafter, "Deighton & Kornfeld 2021").



more than a decade's worth of hands-on experience it can bring to bear on matters related to data protection and data breach management.

SB 1058's proposed amendment to state breach notification requirements is unnecessary and impractical. Breach notification statutes serve to provide consumers and regulators with information about an unauthorized access to or acquisition of specific kinds of financial or health information, in combination with identifiable personal data, so they can take action to mitigate the potential impacts of such an event including identity theft or fraud. By contrast, disclosures of precise geolocation data do not carry the same potential consequences for consumers. Moreover, geolocation data is frequently shared by users, with permission, to companies for common uses including mapping, locating nearby gas stations, and other online personalization.

Because geolocation data does not carry inherent risks of identity theft or fraud, and because including it in the state's data breach notification law could have a chilling effect on the provision of products and services, we respectfully oppose SB 1058. We ask you to amend the bill to remove Section 6's proposed changes to the Connecticut breach notification statute. We would welcome a meeting with you to further explain our concerns with the SB 1058.

* * *

Thank you for your consideration of this letter.

Sincerely,

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CC: Members of the Connecticut House of Representatives

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