

Change is Coming to US Regulations on Data Protection

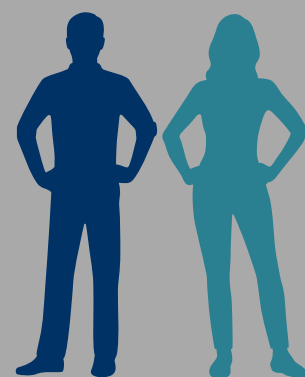
Consent and “Opt-Out” Models



Although policymakers are scrutinizing consent and opt-out models, expect lenient US regulations that minimize consumer burden

Data Subject Rights

Expect expanded rights for data subjects that could include data portability and erasure



FTC Authority

Expect expanded enforcement power for the FTC



Basis for Compliance

Compliance obligations could be based on data type, but if they're based on size they could disadvantage larger players



Data Processor Requirements

Expect legislated data protection obligations for third parties that process or store data but don't collect it

Non-compliance Penalties

If penalties for non-compliance resemble those under GDPR, they'll be severe

