

<b>Compliance Feature</b>	<b>VCDPA</b>	<b>CCPA</b>	<b>GDPR</b>
Application of Law is Subject to “Conducting Business” and Other Thresholds	✓	✓	-
Broad Definition of “Personal Information/Data”	✓	✓	✓
Special Obligations for “Sensitive Data”	✓	-*	✓
B2B Info & Employment Info Exceptions	✓	-*	-
Consumer Rights to: <ul style="list-style-type: none"> <li>• Access/Know</li> <li>• Delete</li> <li>• Modify</li> <li>• Portability</li> <li>• Non-Discrimination</li> <li>• Opt-Out (below)</li> </ul>	✓ *More limited bases for denial than CCPA	✓*	✓
Data Protection (Impact) Assessment	✓	-*	✓
Private Right of Action	-	✓	✓ *subject of debate
Privacy Policy with Required Content	✓	✓	✓
“Notice at Collection” of Purpose, Uses and Sharing of Info	-**	✓	- *Privacy Policy must be provided in timely manner
Opt-Out of Sale	✓ *more limited definition than CCPA	✓*	- *may object or revoke consent
Opt-Out of Certain Advertising	✓	-*	- *may object or revoke consent
Obligations re: “De-Identified Data”	✓	-*	-
Info Controllers & Processors with Statutory and Contractual Obligations	✓	-*	✓
Mandatory Consumer Appeal Process for Denied Requests	✓	-	-
Data collection limited to that which is adequate, relevant and reasonably necessary for the purpose(s) of processing	✓	-*	✓

\* CPRA has modified this feature of CCPA

\*\* VCDPA does not contain an express timeliness requirement for the Privacy Notice; however, the obligation to provide “meaningful” notice implies that it should be provided at or before data collection