



**Champion Advocacy
Associates**

March 27, 2024

Honorable Jacquelyn Baginski
Chairwoman, House Innovation, Internet and Technology Committee
Rhode Island State House
Providence, RI 02903

RE: H.7787, An Act Relating to Commercial Law – General Regulatory Provisions – Rhode Island Data Transparency and Privacy Protection Act

Chairwoman Baginski and Committee Members,

The Northern RI Chamber of Commerce (NRICC) represents businesses in the communities of Burrillville, Central Falls, Cumberland, Foster, Glocester, Johnston, Lincoln, North Providence, North Smithfield, Pawtucket, Scituate, Smithfield and Woonsocket. The Chamber is opposed to the passage of H.7787, An Act Relating to Commercial Law – General Regulatory Provisions – Rhode Island Data Transparency and Privacy Protection Act in its current form.

Because online activity is so heavily involved in interstate commerce, the Chamber believes the best way to regulate such activities is to do so on a federal level. While we appreciate the frustrations that come with waiting for the federal government to act, it is important that companies doing business in multiple states do not face a patchwork of laws leading to confusion and mistakes.

The Chamber appreciates the sponsor's choice to include the listing of categories of information that is collected, instead of individualized disclosures to online users. We also appreciate that H.7787 does not include a private right of action, and that certain heavily regulated industries are exempt.

We do continue to have concerns related to the detailed requirements with which non-exempt businesses must comply, as well as the imprecise definition of certain data. H.7787 limits the collection of personal data to data considered "adequate, relevant and reasonably necessary in relation to the purposes for which data is processed." What may seem completely relevant to the business, may be deemed the opposite by the Attorney General, leading to the potential for many court cases. Industries in Rhode Island are very diverse. Data relevant to one industry may be determined to be irrelevant for another. This again, places businesses in a precarious situation trying to decide what is allowable and what is not allowable under the legislation.

H.7787 allows customers to correct inaccuracies in the data collected or to delete data collected. We wonder if this is technically possible since a company could have thousands of customers in Rhode Island.

For these reasons, we urge the committee not to pass H.7787.

Respectfully,


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