



Consumer Data Industry Association
1090 Vermont Ave., NW, Suite 200
Washington, D.C. 20005-4905

March 19, 2026

Chair and Members of the House Judiciary Committee
Alaska State Legislature
120 4th Street
Juneau, AK 99501

Dear Chair and Members of the Committee:

The Consumer Data Industry Association (CDIA) respectfully submits this letter in opposition to HB 367, the Consumer Personal Information Privacy Act.

CDIA represents the consumer reporting industry, including nationwide credit bureaus, regional and specialized credit bureaus, background check companies, and more. Since our founding in 1906, we have promoted the responsible use of consumer data to empower financial opportunities, reduce fraud, and manage risk. Through data analytics, our members facilitate fair and secure transactions, foster competition, and expand consumers' access to tailored financial products.

While CDIA supports the goal of protecting consumer privacy, HB 367 as currently drafted would impose significant challenges that would disrupt well established data systems and undermine services that benefit consumers.

Mandatory Data Broker Registration

HB 367 requires data brokers to register with the state prior to conducting business and to publicly disclose detailed corporate information, including maintaining a website through which consumers can request that their information not be collected or sold.

These requirements would impose new administrative burdens while also creating security risks associated with maintaining a publicly accessible registry. Such obligations may discourage lawful data driven services that play a critical role in fraud prevention, identity verification, and risk mitigation.



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Revenue Based Fees on Data Transactions

HB 367 imposes a three percent fee on revenue derived from the buying, selling, or sharing of personal information. This provision effectively operates as a tax on data driven business models.

For companies engaged in lawful information sharing, such as fraud prevention, analytics, and risk assessment, this fee would significantly increase costs and may deter business operations within the state.

Consumer Opt-Out Requirements

HB 367 grants consumers the right to direct businesses to stop selling or sharing their personal information and requires recognition of global privacy control signals, such as browser- or device-based settings.

Compliance with these provisions would require companies to build and maintain complex technical systems capable of detecting such signals, processing opt-out requests, and ensuring those preferences are honored across downstream partners. These obligations present significant operational challenges and would require substantial ongoing investment.

Disclosure and Deletion Requirements

HB 367 provides consumers with expansive rights to request disclosure of personal information collected, sold, or shared, as well as the right to request deletion of personal information collected within the prior five years.

To comply, businesses would need to implement extensive data mapping, recordkeeping, and tracking systems to identify data sources, categories, and third-party disclosures. The requirement to ensure that downstream recipients also delete the information introduces additional complexity and potential liability, particularly where businesses lack direct control over third-party systems.



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Restrictions on Sensitive Personal Information

HB 367 imposes strict limitations on the collection, use, and disclosure of sensitive personal information, including social security numbers, precise geolocation data, and other highly regulated data elements.

While these categories warrant strong protections, overly broad restrictions may unintentionally interfere with legitimate and beneficial uses of data, including fraud detection, identity verification, and risk mitigation. These functions are critical to protecting consumers and maintaining the integrity of financial and commercial systems.

Conclusion

CDIA appreciates the Legislature's commitment to protecting consumer privacy. However, HB 367 as currently drafted would create substantial regulatory and operational challenges, increase compliance costs, and risk disrupting lawful data uses that provide significant benefits to consumers and the economy.

For these reasons, CDIA respectfully urges the Legislature to reconsider HB 367 and to work with stakeholders to develop a more balanced, clear, and workable approach.

Sincerely,

A handwritten signature in black ink, appearing to read "KQ", is displayed on a light gray rectangular background.

Kris Quigley
Director, State Government Relations