



TECHNET
THE VOICE OF THE
INNOVATION ECONOMY

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January 19, 2024

The Honorable Steve Elkins
Minnesota House of Representatives
Room 517, State Office Building
100 Rev. Dr. Martin Luther King Jr. Boulevard
St. Paul, MN 55155-1232

Re: General feedback on HF 2309, comprehensive data privacy

Dear Representative Elkins:

I would like to submit these comments on behalf of TechNet in regards to your proposed omnibus data privacy legislation, HF 2309.

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50-state level. TechNet's diverse membership includes dynamic American businesses ranging from startups to the most iconic companies on the planet and represents over 4.5 million employees and countless customers in the fields of information technology, artificial intelligence, e-commerce, the sharing and gig economies, advanced energy, transportation, cybersecurity, venture capital, and finance.

Our member companies place a high priority on consumer privacy. The technology industry is fully committed to securing privacy and security for consumers and engages in a wide range of practices to provide consumers with notice, choices about how their data is used, as well as control over their data. TechNet supports a federal standard that establishes a uniform set of rights and responsibilities for all Americans. The global nature of data demands a federal policy, and even the most well-designed state statute will ultimately contribute to a patchwork of different standards across the country, resulting in steep compliance costs and consumer confusion.

And while this issue is best delt with at the federal level, TechNet stands prepared to work with you and your colleagues to prioritize comprehensive data privacy solutions based on a uniform set of standards that include rights for consumers of all ages, including the rights to access, correct, and delete personal data. While doing so, TechNet urges you to consider interoperability with existing models as the

default position. As you know, it is important that privacy bills across the country provide for interoperability and we appreciate your efforts with other legislators in other states to do so. To date, 12 states have enacted privacy laws that borrow from the Virginia/Connecticut framework. Each new concept or definitional change could result in consumer confusion and significantly increase compliance costs for businesses. The California Department of Finance in 2019 estimated the one-time compliance costs of the state's first privacy law at over \$55 billion. Small and midsize companies face \$50,000-\$100,000 to come into compliance with vague and ever-changing requirements.¹

We commend you for your ongoing work to craft a comprehensive data privacy law for Minnesotans. We also appreciate the opportunity to provide you feedback HF 2309, as drafted over the summer and fall of 2023. We understand you are in the process of releasing new amendments to HF 2309 to reflect stakeholder feedback. We look forward to reviewing substitutive amendments to your bill in the coming weeks.

Thank you for your consideration. Please consider TechNet and our members a resource as you advance this initiative.

Thank you,



Tyler Diers
Executive Director, Midwest
TechNet

Cc: Members, Legislative Commission on Data Practices

¹ https://dof.ca.gov/wp-content/uploads/sites/352/Forecasting/Economics/Documents/CCPA_Regulations-SRIA-DOF.pdf