

DATA PRIVACY COMPLIANCE CHECKLIST

TOP 10 TASKS FOR 2025

1 Ensure Compliance with New Comprehensive State Privacy Laws

Prioritize adapting to the laws going into effect in Delaware, Iowa, Maryland, Minnesota, Nebraska, New Hampshire, New Jersey, and Tennessee in 2025.

2 Integrate Responsible AI Practices into Your Data Privacy Program

Components should include clear AI usage policies, transparency to the consumer, and AI-specific employee training.

3 Review and Update Publicly Facing controls like Privacy Notices and Consent/Opt-out Mechanisms

Review that all privacy-related functionality on your website is operating correctly and that your notices accurately reflect current policies and procedures.

4 Conduct Privacy Impact Assessments

Applies to processing activities that represent a “heightened risk of harm” to consumers, such as targeted advertising.

5 Do Not Forget about the Data Inventory

Update and manage obligations accordingly.

6 Identify and Manage Sensitive Personal Information Appropriately

This includes paying attention to how different states require varying levels of handling sensitive personal information.

7 Ensure Compliance with Opt-Out Rights for Profiling, Targeted Advertising, and Selling or Sharing of Personal Information

States vary in terms of their requirements regarding the right to opt out of the sale of personal information, targeted advertising, and specific types of sharing and profiling.

8 Expand Consumer Privacy Rights and Streamline Internal Procedures

Revisit aged procedures to update based on guidance and evolving AG and consumer expectations.

9 Enable Cookie Opt-Out Preferences

California, Colorado, Connecticut, Oregon, Texas, Delaware, Maryland, Montana, New Hampshire, and New Jersey require businesses to recognize the universal opt-out mechanism (UOOM).

10 Bolster Employee Training on Data Privacy Best Practices

Consumer-facing groups should be the priority but any employee that processes personal information should receive the appropriate training.