

GT Blog | Data, Privacy & Cybersecurity



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What is aggregated data?

Provisions Impacting Aggregated Data	California CCPA	California CPRA	Virginia VCDPA	Colorado CPA	Connecticut CTDPA	Utah UCPA
<u>Definition of aggregate data.</u> Does the statute define “Aggregate” data?	✓ ¹	✓ ²	✗	✗	✗	✓ ³
<u>Express exclusion from definition of personal data.</u> Does the statute expressly exclude aggregate data from the definition of “personal information?”	✓ ⁴	✓ ⁵	✗	✗	✗	✓ ⁶

¹ CAL. CIV. CODE § 1798.140(a) (West 2020).
² CAL. CIV. CODE § 1798.140(b) (West 2021).
³ Utah Code Ann. § 13-61-101(3) (2022).
⁴ Cal. Civ. Code § 1798.140(0)(3) (West 2020).
⁵ CAL. CIV. CODE § 1798.140(v)(3) (West 2021).
⁶ Utah Code Ann. 13-61-101(24)(b) (2022).

Provisions Impacting Aggregated Data	California CCPA	California CPRA	Virginia VCDPA	Colorado CPA	Connecticut CTDPA	Utah UCPA
<u>Implicit exclusion from definition of personal data.</u> Does the statute implicitly exclude aggregate data from the definition of “personal information” (i.e., would aggregated data be unlikely to fall within the definition)?	✓ ⁷	✓ ⁸	✓ ⁹	✓ ¹⁰	✓ ¹¹	✓ ¹²
<u>Express exclusion from scope of statute.</u> Does the statute expressly exclude aggregate data from its scope?	✓ ¹³	✓ ¹⁴	✗	✗	✗	✗

Authors

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⁷ Cal. Civ. Code § 1798.140(o)(1) (West 2020).
⁸ Cal. Civ. Code § 1798.140(v)(1) (West 2021).
⁹ Va. Code § 59.1-571 (2022).
¹⁰ C.R.S. § 6-1-1303(17)(a) (2022).
¹¹ Conn. Sub. Bill 6, § 1(18) (2022).
¹² Utah Code Ann. 13-61-101(24)(a) (2022).
¹³ CAL. CIV. CODE § 1798.145(a)(5) (West 2021) (emphasis added).
¹⁴ CAL. CIV. CODE § 1798.145(a)(6) (West 2021) (emphasis added).