


Privacy Bingo

State Privacy Law Edition

Maryland Online Data Privacy Act (MdODPA)

B I N G O				
SCOPE	CONSUMER RIGHTS	WILDCARD	OBLIGATIONS	ENFORCEMENT
Includes processing threshold	Correction	Grants rulemaking authority	Impact assessments	AG has exclusive enforcement authority
Applies to B2B data	Portability	“Sensitive data” includes biometric data	Data minimization	Defined statutory penalties
Applies to employment data	Appeal		Non-discrimination	30 Day Cure Period
Entity-level GLBA exemption	Obtain list of third-party recipients	“Sale” includes money OR other valuable consideration	Security measures	Private right of action for unauthorized access
All non-profit organizations exempt	Deletion	Establishes new privacy protection agency	Recognize universal opt out signals	Enforcement actions published



Scope:

- Applies to for-profit organizations that meet **one** of the following thresholds during a given calendar year:
 - Control or process data of at least 35,000 consumers annually; or
 - Control or process at least 10,000 consumers annually **and** derive over 20% of gross revenue from sale of personal data



Effective date:

October 1, 2025



Consumer rights: Access; correction; deletion; opt out of targeted advertising, sale and profiling; portability; obtain a list of categories of third party recipients of data



Controller obligations:

- Impact assessments; data minimization; purpose limitation; reasonable data security measures; non-discrimination; privacy notice



Enforcement:

- Unspecified penalties
- Discretionary right to cure within 60 days (sunsets after April 1, 2027)