


Privacy Bingo

State Privacy Law Edition

Tennessee Information Protection Act (TIPA)

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 organizations that:
 - Control or process personal data of 100,000 or more consumers during a calendar year; or
 - Control or process personal data of at least 25,000 consumers and derive over 50% of gross revenue from the sale of personal data



Effective date:

July 1, 2025



Consumer rights: Deletion; portability; opt out of profiling; opt in to processing of sensitive data; opt out of automated decision making; opt out of sales



Controller obligations:

- Impact assessments; notice/transparency requirement; non-discrimination; purpose/processing limitation



Enforcement:

- No Private Right of Action
- Right to cure within 60 days
- Up to \$15,000 fine per violation
- Safe harbor for controllers and processors to assert affirmative defense if complying with a written privacy program that “reasonably conforms” to the current and updated National Institute of Standards and Practices (“NIST”) privacy framework.