



Montpelier, Vermont 05601
March 20, 2018

Office of the Attorney General
Pavilion Building
Montpelier, Vermont

Dear Mr. Curtis:

Thank you for your telephone call this morning and your letter of March 9.

I have attached a flow chart that I have developed after I wrote to you on March 7. The flowchart shows the process for providing notice (or avoiding notice) to consumers about unauthorized acquisitions of data. The flowchart is based on the current statutes.

I hope that this flowchart helps you to better understand my request of March 7. Essentially I am looking for a number to put into every box. And what entities go along with each number. I know that your office does not have information for every box. I expect your office to have information for the boxes that I have circled in turquoise on the spreadsheet. If you have information for other boxes, that would be great, too.

I did leave out the decision diamond on whether data collectors have sworn in writing to your office that they maintain written policies and procedures. As I read the relevant statute, the swearing in writing to your office does not affect whether a consumer is notified, merely the order and timing of the notifications to your office and to the consumer.

As we discussed, please let me know when this information will be available. If you have any questions, please call, [REDACTED].

Sincerely,

Thomas Weiss

Exhibit 3
Notice to consumers of
unauthorized acquisitions of
personally identifiable information
H. 764 - data brokers and consumer protection
Thomas Weiss, March 20, 2018

References are to subsections of 9 V. S. A. 2435 unless otherwise noted.

