

US State Children & Teen's Data Privacy: Key Provisions

Provision	AADC			Children's Data Privacy Laws		Consumer Privacy Laws									
	MD	NE	VT ¹	AR ²	NY	CA	CO	CT ³	DE	MD	MN	MT	NH	NJ	OR
Sale of Personal Data	✗	N/A	✗ ⁴	N/A	✗	Opt-in	Opt-in	✗	Opt-in	✗	Opt-in	Opt-in	Opt-in	Opt-in	✗
Targeted Advertising	✗	✗	N/A	✗ ⁵	Opt-in	N/A	Opt-in	✗	Opt-in	✗	Opt-in	Opt-in	Opt-in	Opt-in	✗
Profiling	✗ ⁶	✗ ⁷	N/A	N/A	Strictly necessary or w/ consent	N/A	Opt-in	Opt-in	N/A	N/A	N/A	Opt-in	N/A	Opt-in	✗
Geolocation	✗ ⁸	✗ ⁹	N/A	N/A	Strictly necessary or w/ consent	Silent	Opt-in (precise)	Strictly necessary and w/ a signal	N/A	N/A	N/A	Opt-in (precise)	N/A	N/A	✗
Data Protection Assessments	Yes ¹⁰	N/A	N/A	N/A	N/A	Yes ¹¹	Yes ¹²	Yes	Yes (under 13)	Yes (under 13)	Yes (under 13)	Yes ¹³	Yes (under 13)	Yes (under 13)	Yes (under 13)
Cure Period	90 days w/ substantial compliance	No	No	No	No	No	No	No	No (expired)	60 days	No (expired)	60 days (sunsets 04.1.26)	Yes/No (discretion)	30 days (sunsets 07.15.26)	No (expired)
Damages	\$2,500 negligent \$7,500 intentional	\$50k per violation 07.01.26	Yes	Yes	\$5,000 per violation	\$7,500 per violation	Yes	Yes	Yes	\$10,000 for first offense \$25,000 per subsequent	\$7,500 per violation	\$7,500 per violation	\$10,000 per violation	\$10,000 for first violation \$20,000 for each subsequent	\$7,500 per violation
Private Right of Action	No	No	No	No	No	No	No	No	No	No	No	No	No	No	No
Nonprofit Exemption¹⁴	Yes	No	No	Yes	No	Yes	No	Yes	No	Yes	Yes	Yes	Yes	No	No

Key

- ✗ = Prohibited
- ✗ = Certain requirements

US State Children & Teen's Data Privacy: Key Provisions

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- ¹ Effective January 1, 2027, and subject to rulemaking
 - ² Effective July 1, 2026
 - ³ Amendments go into effect July 1, 2026
 - ⁴ Unless necessary to provide an online service, product, or feature which the covered minor is actively and knowingly engaged.
 - ⁵ Except when the collection is consistent with the context of a particular service or the relationship of the child or teen with the operator, or required or authorized by law.
 - ⁶ Unless appropriate safeguards are in place, the profiling is necessary to provide the requested online product, and is done only with respect to the online product the child is actively and knowingly engaged with; OR for a compelling reason that profiling is in the best interests of children.
 - ⁷ Unless profiling is necessary to provide the requested online product and is done only with respect to the online product the child is actively and knowingly engaged with; OR compelling reason that profiling is in the best interests of children
 - ⁸ May only process precise geolocation where the collection is strictly necessary to provide the online product AND the processing is only for the limited time that is necessary to provide the online product. Must provide an obvious signal to the child for the duration of the collection of precise geolocation.
 - ⁹ Must provide an obvious signal that precise geolocation is being collected.
 - ¹⁰ Data protection assessment is required for a covered entity that provides an online product reasonably likely to be accessed by children, that is offered to the public on or before April 1, 2026 and will continue to be offered to the public after July 1, 2026 OR is offered after April 1, 2026.
 - ¹¹ The personal data of minors under 16 is considered sensitive personal information and processing sensitive personal information requires a risk assessment.
 - ¹² Data protection assessment is required if there is a heightened risk of harm.
 - ¹³ Data protection assessment is required if there is a heightened risk of harm.
 - ¹⁴ Often these laws exempt certain types of nonprofits and not all nonprofits, so always reference the exemption directly.

US State Children & Teen’s Data Privacy: AADC and Children’s Privacy Laws

State	Effective Date	Applicability Threshold
Arkansas	July 1, 2026	<p>Any operator of a website, online service, online application, or mobile application</p> <ul style="list-style-type: none"> Directed at children or teens; or With actual knowledge that it is collecting personal information from children or teens.
Maryland AADC	October 1, 2024	<ul style="list-style-type: none"> Has annual gross revenues exceeding \$25 million; Annually buys, receives, sells, or shares the personal data of 50,000 or more consumers, households, or devices; or Derives at least 50% of its annual revenues from the sale of consumers' personal data; <p>AND</p> <ul style="list-style-type: none"> Is reasonably likely to be accessed by children.
Nebraska AADC	January 1, 2026	<p>Covered online service:</p> <ul style="list-style-type: none"> Has annual gross revenue in excess of \$25 million, adjusted every odd-numbered year based on the Consumer Price Index for All Urban Consumers; Annually buys, receives, sells, or shares the personal data of 50,000 or more consumers, households, or devices, alone or in combination with its affiliates, subsidiaries, or parent companies; AND Derives at least 50% of its annual revenue from the sale or sharing of consumers' personal data. <p>Includes entities that control or are controlled by a business meeting these criteria if they share a name, service mark, or trademark that would lead a reasonable consumer to understand they are commonly owned.</p> <p>It also includes joint ventures or partnerships where any person has an ownership interest of 40% or more.</p> <p>AND</p> <ul style="list-style-type: none"> Provides online services, products, or platforms and has actual knowledge that users are minors <p><i>Exception:</i> Does not include an online service with actual knowledge that fewer than 2% of its users are minors.</p>
New York	June 20, 2025	<p>“Operators” of online services that collect personal data of “covered users.”</p> <ul style="list-style-type: none"> “Operator” is “any person who operates or provides a website on the internet, online service, online application, mobile application, or connected device, and who, alone or jointly with others, controls the purposes and means of processing personal data.” “Covered user” is a New York user of a website, online service, etc. (1) that the operator actually knows to be a minor, or (2) where the website, online service, etc. is “primarily directed to minors.”
Vermont AADC	January 1, 2027	<p>Covered business:</p> <ul style="list-style-type: none"> Conducts business in Vermont; Generates a majority of its annual revenue from online services; Offers online products, services, or features that are reasonably likely to be accessed by minors; Collects consumers’ personal data or has consumers’ personal data collected on its behalf by a processor; AND Determines the purposes and means of processing consumers’ personal data, either alone or jointly with others.

US State Children & Teen's Data Privacy: Consumer Privacy Laws

State	Effective Date	Applicability Threshold
California ⁱ	September 2025	<ul style="list-style-type: none"> \$26.625 million annual gross revenue; Process or control personal data of 100,000 consumers or households; or Derive 50% or more of annual revenues from selling or sharing consumers' personal information;
Colorado	October 1, 2025	<ul style="list-style-type: none"> Any controller that conducts business in Colorado or targets Colorado residents; AND Offers an online service, product, or feature to a consumer who the controller knows or willfully disregards is a minor.
Connecticut	July 1, 2023	<u>Connecticut Data Privacy Act (Main Provisions) (until June 30, 2026)</u> <ul style="list-style-type: none"> Control or process the personal data of at least 100,000 consumers; or Derive more than 25% of gross revenue from sale of personal data, and control or process personal data of at least 25,000 consumers.
	July 1, 2026	<u>Connecticut Data Privacy Act (Main Provisions) (effective July 1, 2026)</u> <ul style="list-style-type: none"> Control or process the personal data of at least 35,000 consumers; Control or process consumers' sensitive data, excluding personal data controlled or processed solely for the purposes of completing a payment transaction; or Offer consumers' personal data for sale in trade or commerce.
	October 1, 2025	<u>Connecticut Data Privacy Act (Children's Privacy Amendments)</u> <ul style="list-style-type: none"> Controllers (above threshold must apply) that offer any online service, product, or feature to consumers whom such controller has actual knowledge, or willfully disregards, are minors
Delaware	January 1, 2025	<ul style="list-style-type: none"> Persons that conduct business in Delaware or produce products or services targeted to Delaware residents; AND <ul style="list-style-type: none"> Controlled or processed the personal data of not less than 35,000 consumers; or Controlled or processed the personal data of not less than 10,000 consumers and derived more than 20% of their gross revenue from the sale of personal data.
Maryland	October 1, 2025	<ul style="list-style-type: none"> Persons that conduct business in Maryland or produce products or services targeted to Maryland residents; AND <ul style="list-style-type: none"> Controlled or processed the personal data of not less than 35,000 consumers; or Controlled or processed the personal data of not less than 10,000 consumers and derived more than 20% of their gross revenue from the sale of personal data.
Minnesota	July 31, 2025	<ul style="list-style-type: none"> Controls or processes personal data of 100,000 consumers or more, excluding personal data controlled or processed solely for the purpose of completing a payment transaction; or Derives over 25% of its gross revenue from the sale of personal data and processes or controls personal data of 25,000 consumers or more.

US State Children & Teen's Data Privacy: Consumer Privacy Laws

State	Effective Date	Applicability Threshold
Montana	October 1, 2025	<p><u>Montana Data Privacy Act (Main Provisions (as amended October 1, 2025))</u></p> <ul style="list-style-type: none"> Control or process the personal data of not less than 25,000 consumers, excluding personal data controlled or processed solely for the purpose of completing a payment transaction; or Control or process the personal data of not less than 15,000 consumers and derive more than 25% of gross revenue from the sale of personal data.
	October 1, 2025	<p><u>Montana Data Privacy Act (Children's Privacy Amendments)</u></p> <ul style="list-style-type: none"> Controllers that conduct business in Montana or deliver commercial products or services that are intentionally targeted to Montana residents and that offer an online service, product, or feature to consumers whom the entity actually knows or willfully disregards are minors.
New Hampshire	January 1, 2025	<ul style="list-style-type: none"> Control or process the personal data of at least 35,000 unique consumers, excluding personal data controlled or processed solely for completing a payment transaction; or Control or process the personal data of at least 10,000 unique consumers and derive more than 25% of their gross revenue from the sale of personal data.
New Jersey	January 15, 2025	<ul style="list-style-type: none"> Control or process the personal data of at least 100,000 consumers. This excludes personal data processed solely for completing payment transactions; or Control or process the personal data of at least 25,000 consumers and derive revenue or receive a discount from the sale of personal data.
Oregon	January 1, 2026	<ul style="list-style-type: none"> Control or process the personal data of 100,000 or more consumers during a calendar year, excluding personal data controlled or processed solely for completing a payment transaction; or Control or process the personal data of 25,000 or more consumers and derive 25% or more of its annual gross revenue from selling personal data.
Virginia	January 1, 2025	<ul style="list-style-type: none"> Control or process personal data of at least 100,000 consumers; 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. <p>Note: In 2024, Virginia amended the VCDPA to add children's privacy provisions; however, those provisions only apply to children under 13 years of age.</p>

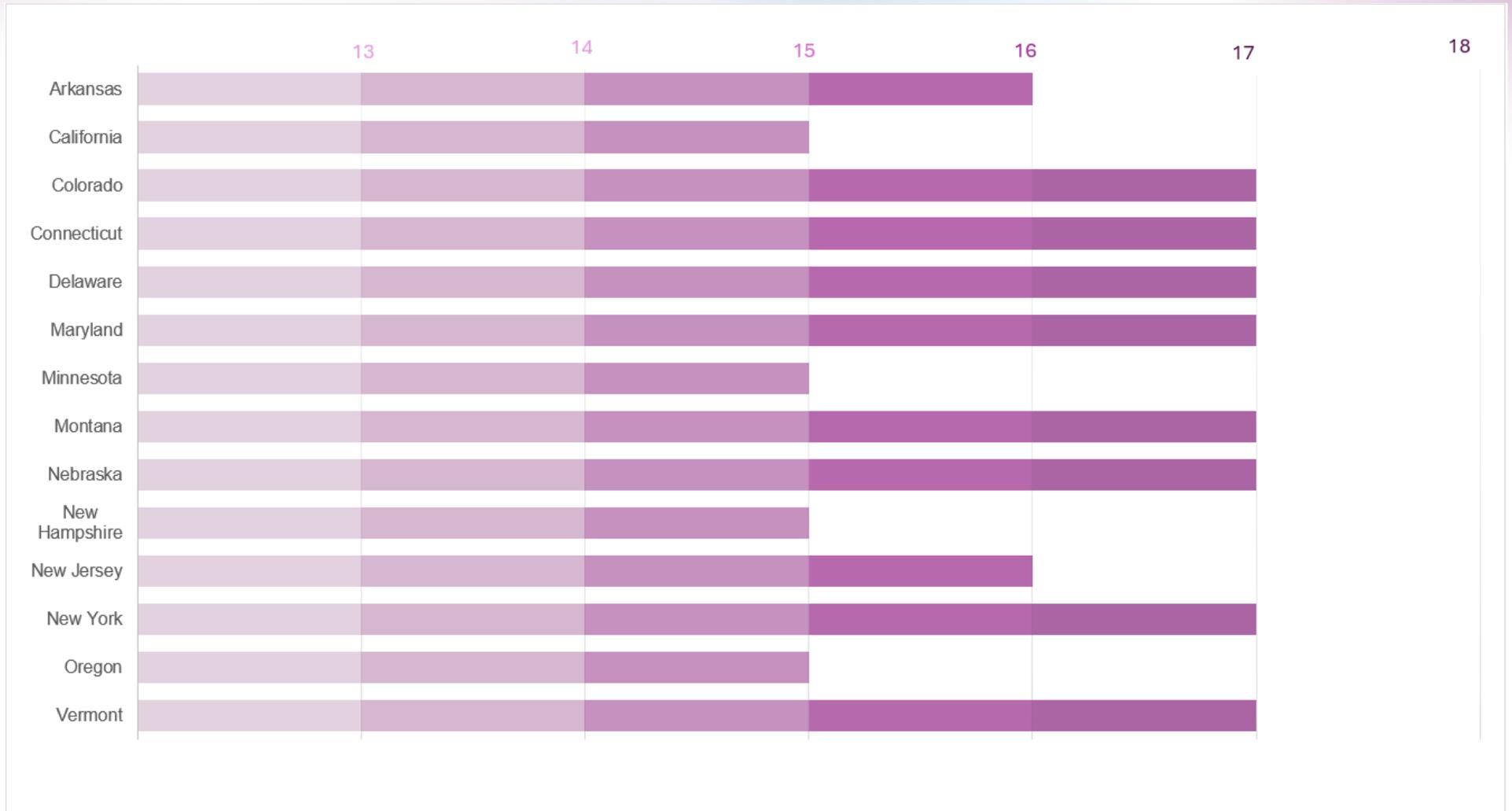
US State Children & Teen's Data Privacy: Age Signal Laws

State	Effective Date	Applicability Threshold
California Digital Age Assurance Act	January 1, 2027	<p>Operating system provider</p> <ul style="list-style-type: none"> A person or entity that develops, licenses, or controls the operating system software on a computer, mobile device, or any other general purpose device. <p>Developer</p> <ul style="list-style-type: none"> A person that owns, maintains, or controls an application.
Louisiana App Store Accountability Law	July 1, 2026	<p>Covered application store provider</p> <ul style="list-style-type: none"> A publicly available website, software application, or electronic service that allows users to download applications from third-party developers onto a mobile device. <p>Developer</p> <ul style="list-style-type: none"> A person who owns or controls an application made available through a covered application store in Louisiana.
Texas App Store Accountability Law²	January 1, 2026	<p>App store</p> <ul style="list-style-type: none"> A publicly available internet website, software application, or other electronic service that distributes software applications. <p>Developer</p> <ul style="list-style-type: none"> The developer of a software application that the developer makes available to users in Texas through an app store.
Utah App Store Accountability Act	May 6, 2026	<p>App store provider</p> <ul style="list-style-type: none"> A person or entity that owns, operates, or controls an app store that allows users in the state to download apps onto a mobile device. This includes managing the platform where apps are made available to users. <p>Developer</p> <ul style="list-style-type: none"> A person or entity that owns or controls an app made available through an app store in the state. This involves creating and maintaining the software applications that users can download and use on their mobile devices.

¹ The California Age-Appropriate Design Code Act is currently enjoined. Therefore, the requirements referenced are derived only from the California Consumer Privacy Act (CCPA).

² Currently enjoined

US State Children & Teen's Data Privacy: Age Applicability



¹ This chart does not include social media laws.

² Each law regulates the personal data of minors inclusive of the highest age indicated in the row for that state. For example, California's law includes requirements for personal data of minors at least 13 years old and under 16 years old and includes requirements for personal data of children under 13. Colorado, Connecticut, Delaware, Maryland, Montana, Nebraska, New York, and Vermont include requirements for personal data of minors under 18 years old.