

Data Broker Registry: Implementation and Registration Update

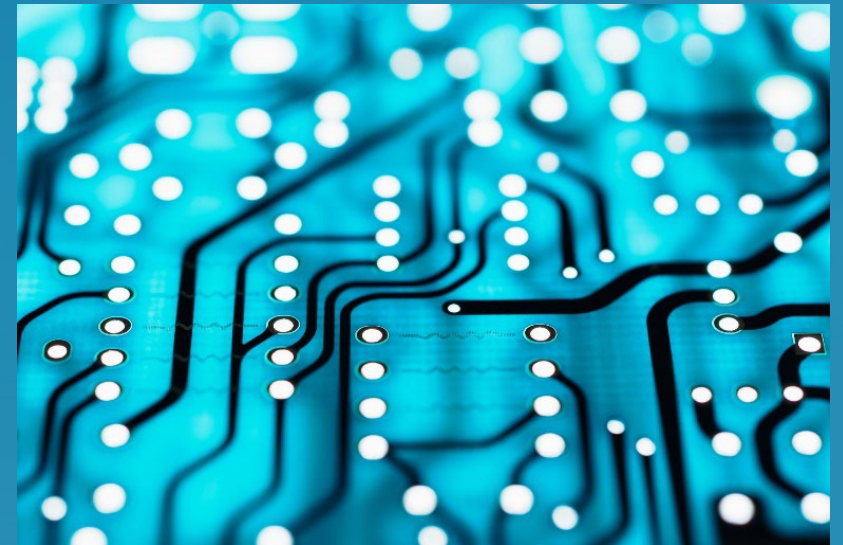
Joint Legislative Committee on Information Management and Technology
January 15, 2025 - 11:30-2:00 PM

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Protecting Oregon consumers

- HB 2052, ORS 646A.593, OAR 441 DIV 840, Data Broker registration,
 - requires a data broker register prior to collecting, selling or licensing brokered personal data within Oregon.
 - applies to business entities that collect and sell the personal/sensitive data of Oregon consumers to another person.



Implementation of the Data Broker Registration law (HB 2052)

Implementation of HB 2052

HB2052, enacted during the
2023 Legislative Session,
Effective:
July 27, 2023



Data brokers are
required to register
by January 1, 2024



August 2023: DCBS
begins administrative
rulemaking process

November 2023: DCBS
begins receiving
registrations from
covered entities



DCBS created a public
facing registry for
Oregonians to access



DCBS hosts outreach
events

Administrative Rulemaking for HB 2052

- **Participants:** 22 external stakeholders, 5 internal stakeholders, and 10 interested parties, including data broker organizations, industry advocates, consumer advocates and representatives from Oregon DOJ
- **Rulemaking process began:** August 28, 2023
- **Rulemaking process led by:** Division of Financial Regulation, Policy Analyst, Teddy Badege
- **Three Rulemaking Advisory Committee (RAC) Meetings held:** August 28, 2023, September 19, 2023, October 10, 2023
- **Final Permanent Rule Filed in May 2024:**
<https://records.sos.state.or.us/ORSOSWebDrawer/Recordhtml/10199034>
- **Key provisions of rule include:** Details of registration and renewal processes and fees, conditions for revocation of registration, requirement to inform DFR of major developments

Hiring and gathering additional resources

- **Hiring 2.0 FTE**
- **Compliance Specialist, Non-Depository Programs, Stacy Adams**
- **Program Analyst 2, Outreach and Engagement, Oralia Cooper**
- **IT Costs**

Non-Depository Programs (Data on registrations)

2024 Data

Total # of Registrations: 126

of incomplete registrations: 13

of withdrawn data brokers: 10

of registrations that expired without renewing: 9

2025 Data (as of today)

Total # of Registrations: 345 active and 218 renewed.

of withdrawn data brokers: 15

of pending renewal applications: 23

Data brokers are at 69% renewed.

New registrations since 11/01/2025: 15

Enforcement

One test case has been escalated to enforcement for failure to register with the division. The company came to our attention through correspondence with DOJ. Our compliance specialist researched the company and found information consistent with activity that would require registration. Multiple attempts were made to correspond with the company.

A notice order was served on the company on December 10, 2025, proposing a \$10,000 civil penalty. (ORS 646A.593(7)). No hearing has been requested by the company. If no hearing is requested, a default order will be issued in January.

We will continue to send cases to enforcement where there is evidence of a failure to register with the state.

Outreach

Consumer Education and stakeholder engagement :

- **Native Caring Conference, Florence, OR in October 2025**
 - The presentation focused on the connection between scams, fraud, and data privacy, while also addressing the requirements of data brokers regarding opt out. We encouraged attendees to share their personal experiences and stories, which serve to educate fellow consumers.
- **Oregon Consumer Justice, Portland, OR in December 2025**
 - Engaging in dialogue and outreach efforts with individuals who are passionate about maintaining their data privacy is essential. Focus on listening to their concerns regarding public privacy and the implications of AI on data usage.
- **Collaborating with DOJ in monthly meetings**
- **[Consumer Privacy Resources](#) website launched in July**
- **Social media - Data privacy resources announced in December**

Looking Ahead to 2026

Continue with outreach efforts

Monitor other state and city data broker registrations in other states to compare with registrants in Oregon

Send additional companies to enforcement for non-compliance

Replace system of record through procurement (July 2027)

Registration process for data brokers

Under ORS 646A.593, OAR 441 DIV 840, there are three required steps a data broker must complete:

- 1. Active Registration:** Have (or obtain) an active registration to do business in Oregon with the [Oregon Secretary of State, Corporations Division](#).
- 2. Application fee:** Apply through [eGov](#) and pay the registration fee of \$600.00.
- 3. Opt-Out Instructions: Submit** a succinct narrative (under 600 characters in total) that describes the various methods that consumers can use to opt out of the collection, selling and licensing of personal data.

The Data Broker registration is valid through the end of each calendar year and will expire at the end of the calendar year if it is not renewed.

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What if I have
questions about the
process?

Contact the data broker compliance specialist by email at dfr.ndp.licensing@dcbs.oregon.gov with questions or concerns.

For more information see [OAR 441 DIV 840](#) (QR code)

