

NIST IR 8477-Based Set Theory Relationship Mapping (STRM)

Reference document: Secure Controls Framework (SCF) version 2026.1
STRM Guidance: <https://securecontrolsframework.com/start-here/set-theory-relationship-mapping-strm/>

Focal Document:

Focal Document URL: https://reg.colorado.gov/sites/default/files/2021a_190_signed.pdf
Published STRM URL: <https://content.securecontrolsframework.com/strm/scf-strm-usa-state-co-privacy-act-2021.pdf>

Colorado Privacy Act (2021)

Colorado Privacy Act (2021)
https://reg.colorado.gov/sites/default/files/2021a_190_signed.pdf
<https://content.securecontrolsframework.com/strm/scf-strm-usa-state-co-privacy-act-2021.pdf>

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
6-1-1301	Short title	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1302	Legislative declaration	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1303	Definitions	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1304	Applicability of part	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1305	Responsibility according to role	N/A	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1305(1)	Responsibility according to role	CONTROLLERS AND PROCESSORS SHALL MEET THEIR RESPECTIVE OBLIGATIONS ESTABLISHED UNDER THIS PART 13.	Functional	Subset Of	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	10	
6-1-1305(2)	Responsibility according to role	PROCESSORS SHALL ADHERE TO THE INSTRUCTIONS OF THE CONTROLLER AND ASSIST THE CONTROLLER TO MEET ITS OBLIGATIONS UNDER THIS PART 13. TAKING INTO ACCOUNT THE NATURE OF PROCESSING AND THE INFORMATION AVAILABLE TO THE PROCESSOR, THE PROCESSOR SHALL ASSIST THE CONTROLLER BY:	Functional	Subset Of	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	10	
6-1-1305(2)(a)	Responsibility according to role	TAKING APPROPRIATE TECHNICAL AND ORGANIZATIONAL MEASURES, INsofar AS THIS IS POSSIBLE, FOR THE FULFILLMENT OF THE CONTROLLER'S OBLIGATION TO RESPOND TO CONSUMER REQUESTS TO EXERCISE THEIR RIGHTS PURSUANT TO SECTION 6-1-1306;	Functional	Intersects With	Security of Personal Data (PD)	PR1-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	8	
6-1-1305(2)(a)	Responsibility according to role	TAKING APPROPRIATE TECHNICAL AND ORGANIZATIONAL MEASURES, INsofar AS THIS IS POSSIBLE, FOR THE FULFILLMENT OF THE CONTROLLER'S OBLIGATION TO RESPOND TO CONSUMER REQUESTS TO EXERCISE THEIR RIGHTS PURSUANT TO SECTION 6-1-1306;	Functional	Intersects With	Reasonable Data Privacy Practices	PR1-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	8	
6-1-1305(2)(b)	Responsibility according to role	HELPING TO MEET THE CONTROLLER'S OBLIGATIONS IN RELATION TO THE SECURITY OF PROCESSING THE PERSONAL DATA AND IN RELATION TO THE NEGOTIATION OF A BREACH OF THE SECURITY OF THE SYSTEM PURSUANT TO SECTION 6-1-716; AND	Functional	Subset Of	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	10	
6-1-1305(2)(c)	Responsibility according to role	PROVIDING INFORMATION TO THE CONTROLLER NECESSARY TO ENABLE THE CONTROLLER TO CONDUCT AND DOCUMENT ANY DATA PROTECTION ASSESSMENTS REQUIRED BY SECTION 6-1-1309. THE CONTROLLER AND PROCESSOR ARE EACH RESPONSIBLE FOR ONLY THE MEASURES ALLOCATED TO THEM.	Functional	Subset Of	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	10	
6-1-1305(3)	Responsibility according to role	NOTWITHSTANDING THE INSTRUCTIONS OF THE CONTROLLER, A PROCESSOR SHALL	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1305(3)(a)	Responsibility according to role	ENSURE THAT EACH PERSON PROCESSING THE PERSONAL DATA IS SUBJECT TO A DUTY OF CONFIDENTIALITY WITH RESPECT TO THE DATA; AND	Functional	Intersects With	Confidentiality Agreements	HRS-06.1	Mechanisms exist to require Non-Disclosure Agreements (NDAs) or similar confidentiality agreements that reflect the needs to protect data and operational details, or both employees and third-parties.	8	
6-1-1305(3)(b)	Responsibility according to role	ENGAGE A SUBCONTRACTOR ONLY AFTER PROVIDING THE CONTROLLER WITH AN OPPORTUNITY TO OBJECT AND PURSUANT TO A WRITTEN CONTRACT IN ACCORDANCE WITH SUBSECTION (5) OF THIS SECTION THAT REQUIRES THE SUBCONTRACTOR TO MEET THE OBLIGATIONS OF THE PROCESSOR WITH RESPECT TO THE PERSONAL DATA.	Functional	Intersects With	Adequate Security for Sensitive / Regulated Data in Support of Contracts	IAO-03.2	Mechanisms exist to protect sensitive/regulated data that is collected, developed, received, transmitted, used or stored in support of the performance of a contract.	8	
6-1-1305(4)	Responsibility according to role	TAKING INTO ACCOUNT THE CONTEXT OF PROCESSING, THE CONTROLLER AND THE PROCESSOR SHALL IMPLEMENT APPROPRIATE TECHNICAL AND ORGANIZATIONAL MEASURES TO ENSURE A LEVEL OF SECURITY APPROPRIATE TO THE RISK AND ESTABLISH A CLEAR ALLOCATION OF THE RESPONSIBILITIES BETWEEN THEM TO IMPLEMENT THE MEASURES.	Functional	Intersects With	Security of Personal Data (PD)	PR1-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	8	
6-1-1305(4)	Responsibility according to role	TAKING INTO ACCOUNT THE CONTEXT OF PROCESSING, THE CONTROLLER AND THE PROCESSOR SHALL IMPLEMENT APPROPRIATE TECHNICAL AND ORGANIZATIONAL MEASURES TO ENSURE A LEVEL OF SECURITY APPROPRIATE TO THE RISK AND ESTABLISH A CLEAR ALLOCATION OF THE RESPONSIBILITIES BETWEEN THEM TO IMPLEMENT THE MEASURES.	Functional	Intersects With	Reasonable Data Privacy Practices	PR1-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	8	
6-1-1305(5)	Responsibility according to role	PROCESSING BY A PROCESSOR MUST BE GOVERNED BY A CONTRACT BETWEEN THE CONTROLLER AND THE PROCESSOR THAT IS BINDING ON BOTH PARTIES AND THAT SETS OUT:	Functional	Subset Of	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for applicable security, compliance and resilience requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	10	
6-1-1305(5)(a)	Responsibility according to role	THE PROCESSING INSTRUCTIONS TO WHICH THE PROCESSOR IS BOUND, INCLUDING THE NATURE AND PURPOSE OF THE PROCESSING;	Functional	Subset Of	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for applicable security, compliance and resilience requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	10	
6-1-1305(5)(b)	Responsibility according to role	THE TYPE OF PERSONAL DATA SUBJECT TO THE PROCESSING, AND THE DURATION OF THE PROCESSING;	Functional	Subset Of	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for applicable security, compliance and resilience requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	10	
6-1-1305(5)(c)	Responsibility according to role	THE REQUIREMENTS IMPOSED BY THIS SUBSECTION (5) AND SUBSECTIONS (3) AND (4) OF THIS SECTION; AND	Functional	Subset Of	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for applicable security, compliance and resilience requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	10	
6-1-1305(5)(d)	Responsibility according to role	THE FOLLOWING REQUIREMENTS:	Functional	Subset Of	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for applicable security, compliance and resilience requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	10	
6-1-1305(5)(d)(i)	Responsibility according to role	AT THE CHOICE OF THE CONTROLLER, THE PROCESSOR SHALL DELETE OR RETURN ALL PERSONAL DATA TO THE CONTROLLER AS REQUESTED AT THE END OF THE PROVISION OF SERVICES, UNLESS RETENTION OF THE PERSONAL DATA IS REQUIRED BY LAW;	Functional	Subset Of	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for applicable security, compliance and resilience requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	10	
6-1-1305(5)(d)(ii)(A)	Responsibility according to role	THE PROCESSOR SHALL MAKE AVAILABLE TO THE CONTROLLER ALL INFORMATION NECESSARY TO DEMONSTRATE COMPLIANCE WITH THE OBLIGATIONS IN THIS PART 13; AND	Functional	Subset Of	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for applicable security, compliance and resilience requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	10	
6-1-1305(5)(d)(ii)(B)	Responsibility according to role	THE PROCESSOR SHALL ALLOW FOR, AND CONTRIBUTE TO, REASONABLE AUDITS AND INSPECTIONS BY THE CONTROLLER OR THE CONTROLLER'S DESIGNATED AUDITOR. ALTERNATIVELY, THE PROCESSOR MAY, WITH THE CONTROLLER'S CONSENT, ARRANGE FOR A QUALIFIED AND INDEPENDENT AUDITOR TO CONDUCT, AT LEAST ANNUALLY AND AT THE PROCESSOR'S EXPENSE, AN AUDIT OF THE PROCESSOR'S POLICIES AND TECHNICAL AND ORGANIZATIONAL MEASURES IN SUPPORT OF THE OBLIGATIONS UNDER THIS PART 13 USING AN APPROPRIATE AND ACCEPTED CONTROL, STANDARD OR FRAMEWORK AND AUDIT PROCEDURE FOR THE AUDITS AS APPLICABLE. THE PROCESSOR SHALL PROVIDE A REPORT OF THE AUDIT TO THE CONTROLLER UPON REQUEST.	Functional	Subset Of	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for applicable security, compliance and resilience requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	10	
6-1-1305(5)(d)(ii)(B)	Responsibility according to role	THE PROCESSOR SHALL ALLOW FOR, AND CONTRIBUTE TO, REASONABLE AUDITS AND INSPECTIONS BY THE CONTROLLER OR THE CONTROLLER'S DESIGNATED AUDITOR. ALTERNATIVELY, THE PROCESSOR MAY, WITH THE CONTROLLER'S CONSENT, ARRANGE FOR A QUALIFIED AND INDEPENDENT AUDITOR TO CONDUCT, AT LEAST ANNUALLY AND AT THE PROCESSOR'S EXPENSE, AN AUDIT OF THE PROCESSOR'S POLICIES AND TECHNICAL AND ORGANIZATIONAL MEASURES IN SUPPORT OF THE OBLIGATIONS UNDER THIS PART 13 USING AN APPROPRIATE AND ACCEPTED CONTROL, STANDARD OR FRAMEWORK AND AUDIT PROCEDURE FOR THE AUDITS AS APPLICABLE. THE PROCESSOR SHALL PROVIDE A REPORT OF THE AUDIT TO THE CONTROLLER UPON REQUEST.	Functional	Intersects With	Review of Third-Party Services	TPM-08	Mechanisms exist to monitor, regularly review and assess External Service Providers (ESPs) for compliance with established contractual requirements for security, compliance and resilience controls.	8	
6-1-1305(6)	Responsibility according to role	IN NO EVENT MAY A CONTRACT RELIEVE A CONTROLLER OR A PROCESSOR FROM THE LIABILITIES INCURRED BY VIRTUE OF ITS ROLE IN THE PROCESSING RELATIONSHIP AS DEFINED BY THIS PART 13.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1305(7)	Responsibility according to role	DETERMINING WHETHER A PERSON IS ACTING AS A CONTROLLER OR PROCESSOR WITH RESPECT TO A SPECIFIC PROCESSING OF DATA IS A FACT-BASED DETERMINATION THAT DEPENDS UPON THE CONTEXT IN WHICH PERSONAL DATA ARE TO BE PROCESSED. A PERSON THAT IS NOT LIMITED IN ITS PROCESSING OF PERSONAL DATA PURSUANT TO A CONTROLLER'S INSTRUCTIONS, OR THAT FAILS TO ADHERE TO THE INSTRUCTIONS, IS A CONTROLLER AND NOT A PROCESSOR WITH RESPECT TO A SPECIFIC PROCESSING OF DATA. A PROCESSOR THAT CONTINUES TO ADHERE TO A CONTROLLER'S INSTRUCTIONS WITH RESPECT TO A SPECIFIC PROCESSING OF PERSONAL DATA REMAINS A PROCESSOR. IF A PROCESSOR BEGINS, ALONE OR JOINTLY WITH OTHERS, DETERMINING THE PURPOSES AND MEANS OF THE PROCESSING OF PERSONAL DATA, IT IS A CONTROLLER WITH RESPECT TO THE PROCESSING.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1305(8)(a)	Responsibility according to role	A CONTROLLER OR PROCESSOR THAT DISCLOSES PERSONAL DATA TO ANOTHER CONTROLLER OR PROCESSOR IN COMPLIANCE WITH THIS PART 13 DOES NOT VIOLATE THIS PART 13 IF THE RECIPIENT PROCESSES THE PERSONAL DATA IN VIOLATION OF THIS PART 13. AND, AT THE TIME OF DISCLOSURE OF THE PERSONAL DATA, THE DISCLOSING CONTROLLER OR PROCESSOR DID NOT HAVE ACTUAL KNOWLEDGE THAT THE RECIPIENT INTENDED TO COMMIT A VIOLATION.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1305(8)(b)	Responsibility according to role	A CONTROLLER OR PROCESSOR RECEIVING PERSONAL DATA FROM A CONTROLLER OR PROCESSOR IN COMPLIANCE WITH THIS PART 13 AS SPECIFIED IN SUBSECTION (8)(a) OF THIS SECTION DOES NOT VIOLATE THIS PART 13 IF THE CONTROLLER OR PROCESSOR FROM WHICH IT RECEIVES THE PERSONAL DATA FAILS TO COMPLY WITH APPLICABLE OBLIGATIONS UNDER THIS PART 13.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1306(1)	Consumer personal data rights - repeal	CONSUMERS MAY EXERCISE THE FOLLOWING RIGHTS BY SUBMITTING A REQUEST USING THE METHODS SPECIFIED BY THE CONTROLLER IN THE PRIVACY NOTICE REQUIRED UNDER SECTION 6-1-1308 (1) (a). THE METHOD MUST TAKE INTO ACCOUNT THE WAYS IN WHICH CONSUMERS NORMALLY INTERACT WITH THE CONTROLLER, THE NEED FOR SECURE AND RELIABLE COMMUNICATION RELATING TO THE REQUEST, AND THE ABILITY OF THE CONTROLLER TO AUTHENTICATE THE IDENTITY OF THE CONSUMER MAKING THE REQUEST. CONTROLLERS SHALL NOT REQUIRE A CONSUMER TO CREATE A NEW ACCOUNT IN ORDER TO EXERCISE CONSUMER RIGHTS PURSUANT TO THIS SECTION BUT MAY REQUIRE A CONSUMER TO USE AN EXISTING ACCOUNT. A CONSUMER MAY SUBMIT A REQUEST AT ANY TIME TO A CONTROLLER SPECIFYING WHICH OF THE FOLLOWING RIGHTS THE CONSUMER WISHES TO EXERCISE:	Functional	Intersects With	Data Subject Empowerment	PR1-06	Mechanisms exist to provide authenticated data subjects the ability to:(1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access;(2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed;(3) Obtain the source(s) of their PD;(4) Obtain the categories of their PD being collected, received, processed, stored and shared;(5) Request correction to their PD due to inaccuracies;(6) Request erasure of their PD; and(7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	8	
6-1-1306(1)	Consumer personal data rights - repeal	CONSUMERS MAY EXERCISE THE FOLLOWING RIGHTS BY SUBMITTING A REQUEST USING THE METHODS SPECIFIED BY THE CONTROLLER IN THE PRIVACY NOTICE REQUIRED UNDER SECTION 6-1-1308 (1) (a). THE METHOD MUST TAKE INTO ACCOUNT THE WAYS IN WHICH CONSUMERS NORMALLY INTERACT WITH THE CONTROLLER, THE NEED FOR SECURE AND RELIABLE COMMUNICATION RELATING TO THE REQUEST, AND THE ABILITY OF THE CONTROLLER TO AUTHENTICATE THE IDENTITY OF THE CONSUMER MAKING THE REQUEST. CONTROLLERS SHALL NOT REQUIRE A CONSUMER TO CREATE A NEW ACCOUNT IN ORDER TO EXERCISE CONSUMER RIGHTS PURSUANT TO THIS SECTION BUT MAY REQUIRE A CONSUMER TO USE AN EXISTING ACCOUNT. A CONSUMER MAY SUBMIT A REQUEST AT ANY TIME TO A CONTROLLER SPECIFYING WHICH OF THE FOLLOWING RIGHTS THE CONSUMER WISHES TO EXERCISE:	Functional	Intersects With	User Feedback Management	PR1-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to requests, complaints, concerns or questions from authenticated data subjects about Personal Data (PD) the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes.	8	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
6-1-1306(1)	Consumer personal data rights - repeal	CONSUMERS MAY EXERCISE THE FOLLOWING RIGHTS BY SUBMITTING A REQUEST USING THE METHODS SPECIFIED BY THE CONTROLLER IN THE PRIVACY NOTICE REQUIRED UNDER SECTION 6-1-1308 (1.1)(a). THE METHOD MUST TAKE INTO ACCOUNT THE WAYS IN WHICH CONSUMERS NORMALLY INTERACT WITH THE CONTROLLER, THE NEED FOR SECURE AND RELIABLE COMMUNICATION RELATING TO THE REQUEST, AND THE ABILITY OF THE CONTROLLER TO AUTHENTICATE THE IDENTITY OF THE CONSUMER MAKING THE REQUEST. CONTROLLERS SHALL NOT REQUIRE A CONSUMER TO CREATE A NEW ACCOUNT IN ORDER TO EXERCISE CONSUMER RIGHTS PURSUANT TO THIS SECTION BUT MAY REQUIRE A CONSUMER TO USE AN EXISTING ACCOUNT. A CONSUMER MAY SUBMIT A REQUEST AT ANY TIME TO A CONTROLLER SPECIFYING WHICH OF THE FOLLOWING RIGHTS THE CONSUMER WISHES TO EXERCISE:	Functional	Intersects With	Data Subject Authentication	PR1-06.8	Mechanisms exist to utilize reasonable consumer expectations to verify a data subject's identity, prior to taking action to disclose, share, correct, amend and/or delete Personal Data (PD).	8	
6-1-1306(1)	Consumer personal data rights - repeal	CONSUMERS MAY EXERCISE THE FOLLOWING RIGHTS BY SUBMITTING A REQUEST USING THE METHODS SPECIFIED BY THE CONTROLLER IN THE PRIVACY NOTICE REQUIRED UNDER SECTION 6-1-1308 (1.1)(a). THE METHOD MUST TAKE INTO ACCOUNT THE WAYS IN WHICH CONSUMERS NORMALLY INTERACT WITH THE CONTROLLER, THE NEED FOR SECURE AND RELIABLE COMMUNICATION RELATING TO THE REQUEST, AND THE ABILITY OF THE CONTROLLER TO AUTHENTICATE THE IDENTITY OF THE CONSUMER MAKING THE REQUEST. CONTROLLERS SHALL NOT REQUIRE A CONSUMER TO CREATE A NEW ACCOUNT IN ORDER TO EXERCISE CONSUMER RIGHTS PURSUANT TO THIS SECTION BUT MAY REQUIRE A CONSUMER TO USE AN EXISTING ACCOUNT. A CONSUMER MAY SUBMIT A REQUEST AT ANY TIME TO A CONTROLLER SPECIFYING WHICH OF THE FOLLOWING RIGHTS THE CONSUMER WISHES TO EXERCISE:	Functional	Intersects With	Data Subject Communications	PR1-17	Mechanisms exist to craft disclosures and communications to data subjects in a manner that is concise, unambiguous and understandable by a reasonable person.	8	
6-1-1306(1)(a)(ii)	Right to opt out	A CONSUMER HAS THE RIGHT TO OPT OUT OF THE PROCESSING OF PERSONAL DATA CONCERNING THE CONSUMER FOR PURPOSES OF: TARGETED ADVERTISING;	Functional	Intersects With	Notice of Right To Opt-Out	PR1-21	Mechanisms exist to include a notification to data subjects within the data privacy notice of:(1) Their right to direct an organization that sells or shares their Personal Data (PD) to stop selling or sharing their PD; and(2) The methods available to exercise that right.	8	
6-1-1306(1)(a)(ii)(A)	Right to opt out		Functional	Intersects With	Notice of Right To Opt-Out	PR1-21	Mechanisms exist to include a notification to data subjects within the data privacy notice of:(1) Their right to direct an organization that sells or shares their Personal Data (PD) to stop selling or sharing their PD; and(2) The methods available to exercise that right.	8	
6-1-1306(1)(a)(ii)(B)	Right to opt out	THE SALE OF PERSONAL DATA; OR	Functional	Intersects With	Notice of Right To Opt-Out	PR1-21	Mechanisms exist to include a notification to data subjects within the data privacy notice of:(1) Their right to direct an organization that sells or shares their Personal Data (PD) to stop selling or sharing their PD; and(2) The methods available to exercise that right.	8	
6-1-1306(1)(a)(ii)(C)	Right to opt out	PROFILING IN FURTHERANCE OF DECISIONS THAT PRODUCE LEGAL OR SIMILARLY SIGNIFICANT EFFECTS CONCERNING A CONSUMER.	Functional	Intersects With	Notice of Right To Opt-Out	PR1-21	Mechanisms exist to include a notification to data subjects within the data privacy notice of:(1) Their right to direct an organization that sells or shares their Personal Data (PD) to stop selling or sharing their PD; and(2) The methods available to exercise that right.	8	
6-1-1306(1)(a)(ii)	Right to opt out	A CONSUMER MAY AUTHORIZE ANOTHER PERSON, ACTING ON THE CONSUMER'S BEHALF, TO OPT OUT OF THE PROCESSING OF THE CONSUMER'S PERSONAL DATA FOR ONE OR MORE OF THE PURPOSES SPECIFIED IN SUBSECTION (1.1)(a)(i) OF THIS SECTION, INCLUDING THROUGH A TECHNOLOGY INDICATING THE CONSUMER'S INTENT TO OPT OUT SUCH AS A WEB LINK INDICATING A PREFERENCE OR BROWSER SETTING, BROWSER EXTENSION, OR GLOBAL DEVICE SETTING. A CONTROLLER SHALL COMPLY WITH AN OPT-OUT REQUEST RECEIVED FROM A PERSON AUTHORIZED BY THE CONSUMER TO ACT ON THE CONSUMER'S BEHALF IF THE CONTROLLER IS ABLE TO AUTHENTICATE, WITH COMMERCIALLY REASONABLE EFFORT, THE IDENTITY OF THE CONSUMER AND THE AUTHORIZED AGENT'S AUTHORITY TO ACT ON THE CONSUMER'S BEHALF.	Functional	Subset Of	Authorized Agent	PR1-03.6	Mechanisms exist to allow data subjects to authorize another person or entity (e.g., authorized agent, proxy, etc.), acting on the data subject's behalf, to make Personal Data (PD) processing decisions.	10	
6-1-1306(1)(a)(iii)	Right to opt out	A CONTROLLER THAT PROCESSES PERSONAL DATA FOR PURPOSES OF TARGETED ADVERTISING OR THE SALE OF PERSONAL DATA SHALL PROVIDE A CLEAR AND CONSPICUOUS METHOD TO EXERCISE THE RIGHT TO OPT OUT OF THE PROCESSING OF PERSONAL DATA CONCERNING THE CONSUMER PURSUANT TO SUBSECTION (1.1)(a)(i) OF THIS SECTION. THE CONTROLLER SHALL PROVIDE THE OPT-OUT METHOD CLEARLY AND CONSPICUOUSLY IN ANY PRIVACY NOTICE REQUIRED TO BE PROVIDED TO CONSUMERS UNDER THIS PART 13, AND IN A CLEAR, CONSPICUOUS, AND READILY ACCESSIBLE LOCATION OUTSIDE THE PRIVACY NOTICE.	Functional	Intersects With	Notice of Right To Opt-Out	PR1-21	Mechanisms exist to include a notification to data subjects within the data privacy notice of:(1) Their right to direct an organization that sells or shares their Personal Data (PD) to stop selling or sharing their PD; and(2) The methods available to exercise that right.	8	
6-1-1306(1)(a)(iv)(A)	Right to opt out	A CONTROLLER THAT PROCESSES PERSONAL DATA FOR PURPOSES OF TARGETED ADVERTISING OR THE SALE OF PERSONAL DATA MAY ALLOW CONSUMERS TO EXERCISE THE RIGHT TO OPT OUT OF THE PROCESSING OF PERSONAL DATA CONCERNING THE CONSUMER FOR PURPOSES OF TARGETED ADVERTISING OR THE SALE OF PERSONAL DATA PURSUANT TO SUBSECTIONS (1)(a)(i)(A) AND (1)(a)(i)(B) OF THIS SECTION BY CONTROLLERS THROUGH A USER-SELECTED UNIVERSAL OPT-OUT MECHANISM THAT MEETS THE TECHNICAL SPECIFICATIONS ESTABLISHED BY THE ATTORNEY GENERAL PURSUANT TO SECTION 6-1-1313. THIS SUBSECTION (1)(a)(iv)(A) IS REPEALED, EFFECTIVE JULY 1, 2024.	Functional	Intersects With	Notice of Right To Opt-Out	PR1-21	Mechanisms exist to include a notification to data subjects within the data privacy notice of:(1) Their right to direct an organization that sells or shares their Personal Data (PD) to stop selling or sharing their PD; and(2) The methods available to exercise that right.	8	
6-1-1306(1)(a)(iv)(B)	Right to opt out	EFFECTIVE JULY 1, 2024, A CONTROLLER THAT PROCESSES PERSONAL DATA FOR PURPOSES OF TARGETED ADVERTISING OR THE SALE OF PERSONAL DATA SHALL ALLOW CONSUMERS TO EXERCISE THE RIGHT TO OPT OUT OF THE PROCESSING OF PERSONAL DATA CONCERNING THE CONSUMER FOR PURPOSES OF TARGETED ADVERTISING OR THE SALE OF PERSONAL DATA PURSUANT TO SUBSECTIONS (1)(a)(i)(A) AND (1)(a)(i)(B) OF THIS SECTION BY CONTROLLERS THROUGH A USER-SELECTED UNIVERSAL OPT-OUT MECHANISM THAT MEETS THE TECHNICAL SPECIFICATIONS ESTABLISHED BY THE ATTORNEY GENERAL PURSUANT TO SECTION 6-1-1313.	Functional	Intersects With	Notice of Right To Opt-Out	PR1-21	Mechanisms exist to include a notification to data subjects within the data privacy notice of:(1) Their right to direct an organization that sells or shares their Personal Data (PD) to stop selling or sharing their PD; and(2) The methods available to exercise that right.	8	
6-1-1306(1)(a)(iv)(C)	Right to opt out	NOTWITHSTANDING A CONSUMER'S DECISION TO EXERCISE THE RIGHT TO OPT OUT OF THE PROCESSING OF PERSONAL DATA THROUGH A UNIVERSAL OPT-OUT MECHANISM PURSUANT TO SUBSECTION (1)(a)(iv)(B) OF THIS SECTION, A CONTROLLER MAY ENABLE THE CONSUMER TO CONSENT, THROUGH A WEB PAGE, APPLICATION, OR A SIMILAR METHOD, TO THE PROCESSING OF THE CONSUMER'S PERSONAL DATA FOR PURPOSES OF TARGETED ADVERTISING OR THE SALE OF PERSONAL DATA, AND THE CONSENT TAKES PRECEDENCE OVER ANY CHOICE REFLECTED THROUGH THE UNIVERSAL OPT-OUT MECHANISM, BEFORE OBTAINING A CONSUMER'S CONSENT TO PROCESS PERSONAL DATA FOR PURPOSES OF TARGETED ADVERTISING OR THE SALE OF PERSONAL DATA PURSUANT TO THIS SUBSECTION (1)(a)(iv)(C). A CONTROLLER SHALL PROVIDE THE CONSUMER WITH A CLEAR AND CONSPICUOUS NOTICE INFORMING THE CONSUMER ABOUT THE CHOICES AVAILABLE UNDER THIS SECTION, DESCRIBING THE CATEGORIES OF PERSONAL DATA TO BE PROCESSED AND THE PURPOSES FOR WHICH THEY WILL BE PROCESSED, AND EXPLAINING HOW AND WHERE THE CONSUMER MAY WITHDRAW CONSENT. THE WEB PAGE, APPLICATION, OR OTHER MEANS BY WHICH A CONTROLLER OBTAINS A CONSUMER'S CONSENT TO PROCESS PERSONAL DATA FOR PURPOSES OF TARGETED ADVERTISING OR THE SALE OF PERSONAL DATA MUST ALSO ALLOW THE CONSUMER TO REVOKE THE CONSENT AS EASILY AS IT IS AFFIRMATIVELY PROVIDED.	Functional	Intersects With	Notice of Right To Opt-Out	PR1-21	Mechanisms exist to include a notification to data subjects within the data privacy notice of:(1) Their right to direct an organization that sells or shares their Personal Data (PD) to stop selling or sharing their PD; and(2) The methods available to exercise that right.	8	
6-1-1306(1)(b)	Right of access	A CONSUMER HAS THE RIGHT TO CONFIRM WHETHER A CONTROLLER IS PROCESSING PERSONAL DATA CONCERNING THE CONSUMER AND TO ACCESS THE CONSUMER'S PERSONAL DATA.	Functional	Intersects With	Data Subject Empowerment	PR1-06	Mechanisms exist to provide authenticated data subjects the ability to:(1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access;(2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed;(3) Obtain the source(s) of their PD;(4) Obtain the categories of their PD being collected, received, processed, stored and shared;(5) Request correction to their PD due to inaccuracies;(6) Request erasure of their PD; and(7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
6-1-1306(1)(c)	Right to correction	A CONSUMER HAS THE RIGHT TO CORRECT INACCURACIES IN THE CONSUMER'S PERSONAL DATA, TAKING INTO ACCOUNT THE NATURE OF THE PERSONAL DATA AND THE PURPOSES OF THE PROCESSING OF THE CONSUMER'S PERSONAL DATA.	Functional	Intersects With	Correcting Inaccurate Personal Data (PD)	PR1-06.1	Mechanisms exist to maintain a process for:(1) Data subjects to have inaccurate Personal Data (PD) maintained by the organization corrected or amended; and(2) Disseminating corrections or amendments of PD to other authorized users of the PD.	5	
6-1-1306(1)(d)	Right to deletion	A CONSUMER HAS THE RIGHT TO DELETE PERSONAL DATA CONCERNING THE CONSUMER.	Functional	Intersects With	Right to Erasure	PR1-06.5	Mechanisms exist to maintain a process to erase a data subject's Personal Data (PD), in accordance with applicable laws, regulations and contractual obligations pertaining to the retention of their PD.	5	
6-1-1306(1)(e)	Right to data portability	WHEN EXERCISING THE RIGHT TO ACCESS PERSONAL DATA PURSUANT TO SUBSECTION (1)(b) OF THIS SECTION, A CONSUMER HAS THE RIGHT TO OBTAIN THE PERSONAL DATA IN A PORTABLE AND, TO THE EXTENT TECHNICALLY FEASIBLE, READILY USABLE FORMAT THAT ALLOWS THE CONSUMER TO TRANSMIT THE DATA TO ANOTHER ENTITY WITHOUT HINDRANCE. A CONSUMER MAY EXERCISE THIS RIGHT NO MORE THAN TWO TIMES PER CALENDAR YEAR. NOTHING IN THIS SUBSECTION (1)(e) REQUIRES A CONTROLLER TO PROVIDE THE DATA TO THE CONSUMER IN A MANNER THAT WOULD DISCLOSE THE CONTROLLER'S TRADE SECRETS.	Functional	Intersects With	Data Portability	PR1-06.6	Mechanisms exist to format exports of Personal Data (PD) in a structured, machine-readable format that allows data subjects to transfer their PD to another controller without hindrance.	5	
6-1-1306(1)(e)	Right to data portability	WHEN EXERCISING THE RIGHT TO ACCESS PERSONAL DATA PURSUANT TO SUBSECTION (1)(b) OF THIS SECTION, A CONSUMER HAS THE RIGHT TO OBTAIN THE PERSONAL DATA IN A PORTABLE AND, TO THE EXTENT TECHNICALLY FEASIBLE, READILY USABLE FORMAT THAT ALLOWS THE CONSUMER TO TRANSMIT THE DATA TO ANOTHER ENTITY WITHOUT HINDRANCE. A CONSUMER MAY EXERCISE THIS RIGHT NO MORE THAN TWO TIMES PER CALENDAR YEAR. NOTHING IN THIS SUBSECTION (1)(e) REQUIRES A CONTROLLER TO PROVIDE THE DATA TO THE CONSUMER IN A MANNER THAT WOULD DISCLOSE THE CONTROLLER'S TRADE SECRETS.	Functional	Intersects With	Personal Data (PD) Exports	PR1-06.7	Mechanisms exist to export a data subject's available Personal Data (PD) in a readily usable format, upon an authenticated request.	5	
6-1-1306(2)(a)	Responding to consumer requests	A CONTROLLER SHALL INFORM A CONSUMER OF ANY ACTION TAKEN ON A REQUEST UNDER SUBSECTION (1) OF THIS SECTION WITHOUT UNDUE DELAY AND, IN ANY EVENT, WITHIN FORTY-FIVE DAYS AFTER RECEIPT OF THE REQUEST. THE CONTROLLER MAY EXTEND THE FORTY-FIVE-DAY PERIOD BY FORTY-FIVE ADDITIONAL DAYS WHERE REASONABLY NECESSARY, TAKING INTO ACCOUNT THE COMPLEXITY AND NUMBER OF THE REQUESTS. THE CONTROLLER SHALL INFORM THE CONSUMER OF AN EXTENSION WITHIN FORTY-FIVE DAYS AFTER RECEIPT OF THE REQUEST, TOGETHER WITH THE REASONS FOR THE DELAY.	Functional	Intersects With	User Feedback Management	PR1-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to requests, complaints, concerns or questions from authenticated data subjects about Personal Data (PD) the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes.	5	
6-1-1306(2)(b)	Responding to consumer requests	IF A CONTROLLER DOES NOT TAKE ACTION ON THE REQUEST OF A CONSUMER, THE CONTROLLER SHALL INFORM THE CONSUMER, WITHOUT UNDUE DELAY AND, AT THE LATEST, WITHIN FORTY-FIVE DAYS AFTER RECEIPT OF THE REQUEST, OF THE REASONS FOR THE DELAY AND PROVIDE INSTRUCTIONS FOR HOW TO APPEAL THE DECISION WITH THE CONTROLLER AS DESCRIBED IN SUBSECTION (3) OF THIS SECTION.	Functional	Intersects With	User Feedback Management	PR1-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to requests, complaints, concerns or questions from authenticated data subjects about Personal Data (PD) the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
6-1-1306(2)(c)	Responding to consumer requests	UPON REQUEST, A CONTROLLER SHALL PROVIDE TO THE CONSUMER THE INFORMATION SPECIFIED IN THIS SECTION FREE OF CHARGE, EXCEPT THAT, FOR A SECOND OR SUBSEQUENT REQUEST WITHIN A TWELVE-MONTH PERIOD, THE CONTROLLER MAY CHARGE AN AMOUNT CALCULATED IN THE MANNER SPECIFIED IN SECTION 24-72-205 (5)(a).	Functional	Intersects With	Data Subject Empowerment	PRI-06	Mechanisms exist to provide authenticated data subjects the ability to:(1) Access their Personal Data (PD) that is being processed, stored and shared, except where the burden, risk or expense of providing access would be disproportionate to the benefit offered to the data subject through granting access;(2) Obtain answers on the specifics of how their PD is collected, received, processed, stored, transmitted, shared, updated and/or disposed;(3) Obtain the source(s) of their PD;(4) Obtain the categories of their PD being collected, received, processed, stored and shared;(5) Request correction to their PD due to inaccuracies;(6) Request erasure of their PD; and(7) Restrict the further collecting, receiving, processing, storing, transmitting, updated and/or sharing of their PD.	5	
6-1-1306(2)(d)	Responding to consumer requests	A CONTROLLER IS NOT REQUIRED TO COMPLY WITH A REQUEST TO EXERCISE ANY OF THE RIGHTS UNDER SUBSECTION (1) OF THIS SECTION IF THE CONTROLLER IS UNABLE TO AUTHENTICATE THE REQUEST USING COMMERCIALY REASONABLE EFFORTS, IN WHICH CASE THE CONTROLLER MAY REQUEST THE PROVISION OF ADDITIONAL INFORMATION REASONABLY NECESSARY TO AUTHENTICATE THE REQUEST.	Functional	Intersects With	Data Subject Authentication	PRI-06.8	Mechanisms exist to utilize reasonable consumer expectations to verify a data subject's identity, prior to taking action to disclose, share, correct, amend and/or delete Personal Data (PD).	5	
6-1-1306(3)(a)	Consumer personal data rights - repeal	A CONTROLLER SHALL ESTABLISH AN INTERNAL PROCESS WHEREBY CONSUMERS MAY APPEAL A REFUSAL TO TAKE ACTION ON A REQUEST TO EXERCISE ANY OF THE RIGHTS UNDER SUBSECTION (1) OF THIS SECTION WITHIN A REASONABLE PERIOD AFTER THE CONSUMER'S RECEIPT OF THE NOTICE SENT BY THE CONTROLLER UNDER SUBSECTION (2)(D) OF THIS SECTION. THE APPEAL PROCESS MUST BE CONSPICUOUSLY AVAILABLE AND AS EASY TO USE AS THE PROCESS FOR SUBMITTING A REQUEST UNDER THIS SECTION.	Functional	Intersects With	Appeal Adverse Decision	PRI-06.3	Mechanisms exist to maintain a process for data subjects to appeal an adverse decision.	5	
6-1-1306(3)(b)	Consumer personal data rights - repeal	WITHIN FORTY-FIVE DAYS AFTER RECEIPT OF AN APPEAL, A CONTROLLER SHALL INFORM THE CONSUMER OF ANY ACTION TAKEN OR NOT TAKEN IN RESPONSE TO THE APPEAL, ALONG WITH A WRITTEN EXPLANATION OF THE REASONS IN SUPPORT OF THE RESPONSE. THE CONTROLLER MAY EXTEND THE FORTY-FIVE DAY PERIOD BY SIXTY ADDITIONAL DAYS WHERE REASONABLY NECESSARY, TAKING INTO ACCOUNT THE COMPLEXITY AND NUMBER OF REQUESTS SERVING AS THE BASIS FOR THE APPEAL. THE CONTROLLER SHALL INFORM THE CONSUMER OF AN EXTENSION WITHIN FORTY-FIVE DAYS AFTER RECEIPT OF THE APPEAL, TOGETHER WITH THE REASONS FOR THE DELAY.	Functional	Intersects With	User Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to requests, complaints, concerns or questions from authenticated data subjects about Personal Data (PD) the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes.	5	
6-1-1306(3)(c)	Consumer personal data rights - repeal	THE CONTROLLER SHALL INFORM THE CONSUMER OF THE CONSUMER'S ABILITY TO CONTACT THE ATTORNEY GENERAL IF THE CONSUMER HAS CONCERNS ABOUT THE RESULT OF THE APPEAL.	Functional	Intersects With	User Feedback Management	PRI-06.4	Mechanisms exist to maintain a process to efficiently and effectively respond to requests, complaints, concerns or questions from authenticated data subjects about Personal Data (PD) the organization collects, receives, processes, stores, transmits, shares, updates and/or disposes.	5	
6-1-1307(1)	Processing de-identified data	THIS PART 13 DOES NOT REQUIRE A CONTROLLER OR PROCESSOR TO DO ANY OF THE FOLLOWING SOLELY FOR PURPOSES OF COMPLYING WITH THIS PART 13:	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1307(1)(a)	Processing de-identified data	REIDENTIFY DE-IDENTIFIED DATA;	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1307(1)(b)	Processing de-identified data	COMPLY WITH AN AUTHENTICATED CONSUMER REQUEST TO ACCESS, CORRECT, DELETE, OR PROVIDE PERSONAL DATA IN A PORTABLE FORMAT PURSUANT TO SECTION 6-1-1306 (1), IF ALL OF THE FOLLOWING ARE TRUE:	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1307(1)(b)(i)(A)	Processing de-identified data	THE CONTROLLER IS NOT REASONABLY CAPABLE OF ASSOCIATING THE REQUEST WITH THE PERSONAL DATA; OR	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1307(1)(b)(i)(B)	Processing de-identified data	IT WOULD BE UNREASONABLY BURDENSOME FOR THE CONTROLLER TO ASSOCIATE THE REQUEST WITH THE PERSONAL DATA;	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1307(1)(b)(ii)	Processing de-identified data	THE CONTROLLER DOES NOT USE THE PERSONAL DATA TO RECOGNIZE OR RESPOND TO THE SPECIFIC CONSUMER WHO IS THE SUBJECT OF THE PERSONAL DATA OR ASSOCIATE THE PERSONAL DATA WITH OTHER PERSONAL DATA ABOUT THE SAME SPECIFIC CONSUMER; AND	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1307(1)(b)(iii)	Processing de-identified data	THE CONTROLLER DOES NOT SELL THE PERSONAL DATA TO ANY THIRD PARTY OR OTHERWISE VOLUNTARILY DISCLOSE THE PERSONAL DATA TO ANY THIRD PARTY, EXCEPT AS OTHERWISE AUTHORIZED BY THE CONSUMER; OR	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1307(1)(c)	Processing de-identified data	MAINTAIN DATA IN IDENTIFIABLE FORM OR COLLECT, OBTAIN, RETAIN, OR ACCESS ANY DATA OR TECHNOLOGY IN ORDER TO ENABLE THE CONTROLLER TO ASSOCIATE AN AUTHENTICATED CONSUMER REQUEST WITH PERSONAL DATA.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1307(2)	Processing de-identified data	A CONTROLLER THAT USES DE-IDENTIFIED DATA SHALL EXERCISE REASONABLE OVERSIGHT TO MONITOR COMPLIANCE WITH ANY CONTRACTUAL COMMITMENTS TO WHICH THE DE-IDENTIFIED DATA ARE SUBJECT AND SHALL TAKE APPROPRIATE STEPS TO ADDRESS ANY BREACHES OF CONTRACTUAL COMMITMENTS.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1307(3)	Processing de-identified data	THE RIGHTS CONTAINED IN SECTION 6-1-1306 (1)(b) TO (1)(e) DO NOT APPLY TO PSEUDONYMIZED DATA IF THE CONTROLLER CAN DEMONSTRATE THAT THE INFORMATION NECESSARY TO IDENTIFY THE CONSUMER IS KEPT SEPARATELY AND IS SUBJECT TO EFFECTIVE TECHNICAL OR ORGANIZATIONAL CONTROLS THAT PREVENT THE CONTROLLER FROM ACCESSING THE INFORMATION.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1308	Duties of controllers	N/A	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1308(1)(a)	Duty of transparency	A CONTROLLER SHALL PROVIDE CONSUMERS WITH A REASONABLY ACCESSIBLE, CLEAR, AND MEANINGFUL PRIVACY NOTICE THAT INCLUDES:	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to:(1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary;(2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed;(3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations;(4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice;(5) Periodically, review and update the content of the privacy notice, as necessary; and(6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
6-1-1308(1)(a)(i)	Duty of transparency	THE CATEGORIES OF PERSONAL DATA COLLECTED OR PROCESSED BY THE CONTROLLER OR A PROCESSOR;	Functional	Intersects With	Personal Data (PD) Categories	PRI-05.7	Mechanisms exist to define and implement data handling and protection requirements for specific categories of sensitive Personal Data (PD).	5	
6-1-1308(1)(a)(ii)	Duty of transparency	THE PURPOSES FOR WHICH THE CATEGORIES OF PERSONAL DATA ARE PROCESSED;	Functional	Intersects With	Purpose Specification	PRI-02.1	Mechanisms exist to ensure data privacy notices identify the purpose(s) for which Personal Data (PD) is collected, received, processed, stored, transmitted and/or shared.	5	
6-1-1308(1)(a)(iii)	Duty of transparency	HOW AND WHERE CONSUMERS MAY EXERCISE THE RIGHTS PURSUANT TO SECTION 6-1-1306, INCLUDING THE CONTROLLER'S CONTACT INFORMATION AND HOW A CONSUMER MAY APPEAL A CONTROLLER'S ACTION WITH REGARD TO THE CONSUMER'S REQUEST	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to:(1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary;(2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed;(3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations;(4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice;(5) Periodically, review and update the content of the privacy notice, as necessary; and(6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
6-1-1308(1)(a)(iv)	Duty of transparency	THE CATEGORIES OF PERSONAL DATA THAT THE CONTROLLER SHARES WITH THIRD PARTIES, IF ANY; AND	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to:(1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary;(2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed;(3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations;(4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice;(5) Periodically, review and update the content of the privacy notice, as necessary; and(6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
6-1-1308(1)(a)(v)	Duty of transparency	THE CATEGORIES OF THIRD PARTIES, IF ANY, WITH WHOM THE CONTROLLER SHARES PERSONAL DATA.	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to:(1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary;(2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed;(3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations;(4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice;(5) Periodically, review and update the content of the privacy notice, as necessary; and(6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
6-1-1308(1)(b)	Duty of transparency	IF A CONTROLLER SELLS PERSONAL DATA TO THIRD PARTIES OR PROCESSES PERSONAL DATA FOR TARGETED ADVERTISING, THE CONTROLLER SHALL CLEARLY AND CONSPICUOUSLY DISCLOSE THE SALE OR PROCESSING, AS WELL AS THE MANNER IN WHICH A CONSUMER MAY EXERCISE THE RIGHT TO OPT OUT OF THE SALE OR PROCESSING.	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
6-1-1308(1)(b)	Duty of transparency	IF A CONTROLLER SELLS PERSONAL DATA TO THIRD PARTIES OR PROCESSES PERSONAL DATA FOR TARGETED ADVERTISING, THE CONTROLLER SHALL CLEARLY AND CONSPICUOUSLY DISCLOSE THE SALE OR PROCESSING, AS WELL AS THE MANNER IN WHICH A CONSUMER MAY EXERCISE THE RIGHT TO OPT OUT OF THE SALE OR PROCESSING.	Functional	Intersects With	Prohibition of Selling, Processing and/or Sharing Personal Data (PD)	PRI-03.3	Mechanisms exist to prevent the sale, processing and/or sharing of Personal Data (PD) when: (1) Instructed by the data subject; or (2) The data subject is a minor, where selling and/or sharing PD is legally prohibited.	5	
6-1-1308(1)(c)	Duty of transparency	A CONTROLLER SHALL NOT: REQUIRE A CONSUMER TO CREATE A NEW ACCOUNT IN ORDER TO EXERCISE A RIGHT; OR	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1308(1)(C)(I)	Duty of transparency	BASED SOLELY ON THE EXERCISE OF A RIGHT AND UNRELATED TO FEASIBILITY OR THE VALUE OF A SERVICE, INCREASE THE COST OF, OR DECREASE THE AVAILABILITY OF, THE PRODUCT OR SERVICE.	Functional	Intersects With	Product or Service Delivery Restrictions	PRI-03.5	Mechanisms exist to prevent discrimination against a data subject for exercising their legal rights pertaining to modifying or revoking consent, including prohibiting: (1) Refusing products and/or services; (2) Charging different rates for goods and/or services; and (3) Providing different levels of quality.	5	
6-1-1308(1)(C)(II)	Duty of transparency	BASED SOLELY ON THE EXERCISE OF A RIGHT AND UNRELATED TO FEASIBILITY OR THE VALUE OF A SERVICE, INCREASE THE COST OF, OR DECREASE THE AVAILABILITY OF, THE PRODUCT OR SERVICE.	Functional	Intersects With	Product or Service Delivery Restrictions	PRI-03.5	Mechanisms exist to prevent discrimination against a data subject for exercising their legal rights pertaining to modifying or revoking consent, including prohibiting: (1) Refusing products and/or services; (2) Charging different rates for goods and/or services; and (3) Providing different levels of quality.	5	
6-1-1308(1)(d)	Duty of transparency	NOTHING IN THIS PART 13 SHALL BE CONSTRUED TO REQUIRE A CONTROLLER TO PROVIDE A PRODUCT OR SERVICE THAT REQUIRES THE PERSONAL DATA OF A CONSUMER THAT THE CONTROLLER DOES NOT COLLECT OR MAINTAIN OR TO PROHIBIT A CONTROLLER FROM OFFERING A DIFFERENT PRICE, RATE, LEVEL, QUALITY, OR SELECTION OF GOODS OR SERVICES TO A CONSUMER, INCLUDING OFFERING GOODS OR SERVICES FOR NO FEE, IF THE OFFER IS RELATED TO A CONSUMER'S VOLUNTARY PARTICIPATION IN A BONA FIDE LOYALTY, REWARDS, PREMIUM FEATURES, DISCOUNT, OR CLUB CARD PROGRAM.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1308(2)	Duty of purpose specification	A CONTROLLER SHALL SPECIFY THE EXPRESS PURPOSES FOR WHICH PERSONAL DATA ARE COLLECTED AND PROCESSED.	Functional	Intersects With	Data Privacy Notice	PRI-02	Mechanisms exist to: (1) Make data privacy notice(s) available to individuals upon first interacting with an organization and subsequently as necessary; (2) Ensure that data privacy notices are clear and easy-to-understand, expressing relevant information about how Personal Data (PD) is collected, received, processed, stored, transmitted, shared, updated and/or disposed; (3) Contain all necessary notice-related criteria required by applicable statutory, regulatory and contractual obligations; (4) Define the scope of PD processing activities, including the geographic locations and third-party recipients that process the PD within the scope of the data privacy notice; (5) Periodically, review and update the content of the privacy notice, as necessary; and (6) Retain prior versions of the privacy notice, in accordance with data retention requirements.	5	
6-1-1308(3)	Duty of data minimization	A CONTROLLER'S COLLECTION OF PERSONAL DATA MUST BE ADEQUATE, RELEVANT, AND LIMITED TO WHAT IS REASONABLY NECESSARY IN RELATION TO THE SPECIFIED PURPOSES FOR WHICH THE DATA ARE PROCESSED.	Functional	Subset Of	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	10	
6-1-1308(4)	Duty to avoid secondary use	A CONTROLLER SHALL NOT PROCESS PERSONAL DATA FOR PURPOSES THAT ARE NOT REASONABLY NECESSARY TO OR COMPATIBLE WITH THE SPECIFIED PURPOSES FOR WHICH THE PERSONAL DATA ARE PROCESSED, UNLESS THE CONTROLLER FIRST OBTAINS THE CONSUMER'S CONSENT.	Functional	Subset Of	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	10	
6-1-1308(5)	Duty of care	A CONTROLLER SHALL TAKE REASONABLE MEASURES TO SECURE PERSONAL DATA DURING BOTH STORAGE AND USE FROM UNAUTHORIZED ACQUISITION, THE DATA SECURITY PRACTICES MUST BE APPROPRIATE TO THE VOLUME, SCOPE, AND NATURE OF THE PERSONAL DATA PROCESSED AND THE NATURE OF THE BUSINESS.	Functional	Intersects With	Security of Personal Data (PD)	PRI-01.6	Mechanisms exist to ensure Personal Data (PD) is protected by logical and physical security safeguards that are sufficient and appropriately scoped to protect the confidentiality and integrity of the PD.	8	
6-1-1308(5)	Duty of care	A CONTROLLER SHALL TAKE REASONABLE MEASURES TO SECURE PERSONAL DATA DURING BOTH STORAGE AND USE FROM UNAUTHORIZED ACQUISITION, THE DATA SECURITY PRACTICES MUST BE APPROPRIATE TO THE VOLUME, SCOPE, AND NATURE OF THE PERSONAL DATA PROCESSED AND THE NATURE OF THE BUSINESS.	Functional	Intersects With	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	8	
6-1-1308(6)	Duty to avoid unlawful discrimination	A CONTROLLER SHALL NOT PROCESS PERSONAL DATA IN VIOLATION OF STATE OR FEDERAL LAWS THAT PROHIBIT UNLAWFUL DISCRIMINATION AGAINST CONSUMERS.	Functional	Intersects With	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	5	
6-1-1308(7)	Duty regarding sensitive data	A CONTROLLER SHALL NOT PROCESS A CONSUMER'S SENSITIVE DATA WITHOUT FIRST OBTAINING THE CONSUMER'S CONSENT OR, IN THE CASE OF THE PROCESSING OF PERSONAL DATA CONCERNING A KNOWN CHILD, WITHOUT FIRST OBTAINING CONSENT FROM THE CHILD'S PARENT OR LAWFUL GUARDIAN.	Functional	Subset Of	Reasonable Data Privacy Practices	PRI-01.11	Mechanisms exist to limit the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of Personal Data (PD) according to reasonable consumer expectations for what is necessary and proportionate.	10	
6-1-1309	Data protection assessments - attorney general access and evaluation - definition.	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1310	Liability	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1311	Enforcement - penalties - repeal	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1312	Preemption - local governments	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1313(1)	Rules - opt-out mechanism	THE ATTORNEY GENERAL MAY PROMULGATE RULES FOR THE PURPOSE OF CARRYING OUT THIS PART 13.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1313(2)	Rules - opt-out mechanism	BY JULY 1, 2023, THE ATTORNEY GENERAL SHALL ADOPT RULES THAT DETAIL THE TECHNICAL SPECIFICATIONS FOR ONE OR MORE UNIVERSAL, OPT-OUT MECHANISMS THAT CLEARLY COMMUNICATE A CONSUMER'S AFFIRMATIVE, FREELY GIVEN, AND UNAMBIGUOUS CHOICE TO OPT OUT OF THE PROCESSING OF PERSONAL DATA FOR PURPOSES OF TARGETED ADVERTISING OR THE SALE OF PERSONAL DATA PURSUANT TO SECTION 6-1-1306 (1)(a)(II)(A) OR (1)(a)(II)(B). THE ATTORNEY GENERAL MAY UPDATE THE RULES THAT DETAIL THE TECHNICAL SPECIFICATIONS FOR THE MECHANISMS FROM TIME TO TIME TO REFLECT THE MEANS BY WHICH CONSUMERS INTERACT WITH CONTROLLERS. THE RULES MUST:	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1313(2)(a)	Rules - opt-out mechanism	NOT PERMIT THE MANUFACTURER OF A PLATFORM, BROWSER, DEVICE, OR ANY OTHER PRODUCT OFFERING A UNIVERSAL OPT-OUT MECHANISM TO UNFAIRLY DISADVANTAGE ANOTHER CONTROLLER.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1313(2)(b)	Rules - opt-out mechanism	REQUIRE CONTROLLERS TO INFORM CONSUMERS ABOUT THE OPT-OUT CHOICES AVAILABLE UNDER SECTION 6-1-1306 (1)(a)(II).	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1313(2)(c)	Rules - opt-out mechanism	NOT ADOPT A MECHANISM THAT IS A DEFAULT SETTING, BUT RATHER CLEARLY REPRESENTS THE CONSUMER'S AFFIRMATIVE, FREELY GIVEN, AND UNAMBIGUOUS CHOICE TO OPT OUT OF THE PROCESSING OF PERSONAL DATA PURSUANT TO SECTION 6-1-1306 (1)(a)(II)(A) OR (1)(a)(II)(B).	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1313(2)(d)	Rules - opt-out mechanism	DOPT A MECHANISM THAT IS CONSUMER-FRIENDLY, CLEARLY DESCRIBED, AND EASY TO USE BY THE AVERAGE CONSUMER.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1313(2)(e)	Rules - opt-out mechanism	ADOPT A MECHANISM THAT IS AS CONSISTENT AS POSSIBLE WITH ANY OTHER SIMILAR MECHANISM REQUIRED BY LAW OR REGULATION IN THE UNITED STATES; AND	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1313(2)(f)	Rules - opt-out mechanism	PERMIT THE CONTROLLER TO ACCURATELY AUTHENTICATE THE CONSUMER AS A RESIDENT OF THIS STATE AND DETERMINE THAT THE MECHANISM REPRESENTS A LEGITIMATE REQUEST TO OPT OUT OF THE PROCESSING OF PERSONAL DATA FOR PURPOSES OF TARGETED ADVERTISING OR THE SALE OF PERSONAL DATA PURSUANT TO SECTION 6-1-1306 (1)(a)(II)(A) OR (1)(a)(II)(B).	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-1313(3)	Rules - opt-out mechanism	BY JANUARY 1, 2025, THE ATTORNEY GENERAL MAY ADOPT RULES THAT GOVERN THE PROCESS OF ISSUING OPINION LETTERS AND INTERPRETIVE GUIDANCE TO DEVELOP AN OPERATIONAL FRAMEWORK FOR BUSINESS THAT INCLUDES A GOOD FAITH BELIEF DEFENSE OF AN ACTION THAT MAY OTHERWISE CONSTITUTE A VIOLATION OF THIS PART 13. THE RULES MUST BECOME EFFECTIVE BY JULY 1, 2025.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-104	Cooperative reporting	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-105	Unfair or deceptive trade practices	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-107	Powers of attorney general and district attorneys	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-108	Subpoenas - hearings - rules	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control
6-1-110	Restraining orders - injunctions - assurances of discontinuance	See FDE for details.	Functional	No Relationship	N/A	N/A	N/A	0	No applicable SCF control