



## Maryland Online Data Privacy Act (MODPA) – Dealer Compliance Checklist (Effective October 1, 2025)

### ✔ Determine Coverage

- Do you process data for 35,000+ Maryland consumers annually?
- Or 10,000+ if 20%+ of revenue comes from selling personal data?

### ✔ Consumer Rights

- Set up systems for consumers to:
  - Access their data
  - Correct inaccuracies
  - Delete data
  - Obtain a copy of their data
  - Opt out of targeted ads, data sales, profiling

### ✔ Privacy Policy Updates

- Clearly explain what data you collect, how it is used, and how long it is stored.
- Provide instructions for exercising consumer rights.

### ✔ Data Minimization & Retention

- Collect only what is reasonably necessary for a stated purpose.
- Establish limits on how long data is stored.

### ✔ Sensitive Data (Opt-In Required)

- Obtain explicit consent before processing:
  - Precise geolocation
  - Biometric data
  - Data of children under 13
  - Other sensitive categories

### ✔ Security Safeguards

- Implement “reasonable” security measures to protect personal data.
- Train employees on compliance procedures.

### ✔ Prepare for Enforcement

- Keep records of compliance steps.
- Monitor for updates or guidance from the Maryland Attorney General.