

April 1, 2025

The Honorable Robert Craven, Chair House Committee on Judiciary Rhode Island General Assembly Providence, RI 02903

Re: HB 5892 - Personal Information of Judicial Officials

Dear Chair Craven and members of the Committee:

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50-state level. TechNet's diverse membership includes dynamic American businesses ranging from startups to the most iconic companies on the planet and represents over 4.5 million employees and countless customers in the fields of information technology, artificial intelligence, ecommerce, the sharing and gig economies, advanced energy, transportation, cybersecurity, venture capital, and finance.

TechNet members agree with the intent of the legislation to safeguard the personal information of members of the judiciary. Data privacy is a top priority of TechNet and we were proud to support last session's comprehensive data privacy law. That law grants all Rhode Islanders the right to have their personal data deleted without disrupting critical data flows for banking, fraud prevention, healthcare, insurance, and more.

HB 5892 does not make allowances for business-to-business transfers in accordance with federal laws like FCRA, GLBA, DPPA and HIPAA. It lacks exemptions for publicly available information, which is relied upon for financial transactions, insurance purposes, and more, making it difficult for protected individuals who avail themselves of the rights under this act to access banking, insurance, credit, and other services.

The bill also does not include an exemption for data used for fraud prevention services, meaning protected individuals would be easier targets for identity theft.



Compliance with the provisions of HB 5892 would prove extremely difficult, as the bill as currently written requires businesses to comply instantly upon receiving a request. State data privacy laws, including Rhode Island's, allow for an appropriate amount of time to respond to rights requests.

These provisions are made more problematic by the inclusion of a private right of action. With difficult compliance standards and the opportunity for law firms to serve as "authorized agents" to make deletion demands on behalf of protected individuals, passage of this legislation would make Rhode Island a magnet for abusive litigation.

Legislation aiming to protect public servants from the malicious and unauthorized disclosure of their personal information should focus on the individuals posting said information with the intent to cause harm, rather than layering an additional and conflicting data privacy regime on top of the state's strong existing protections.

Thank you for your consideration. Please do not hesitate to contact me if I can provide any additional information.

Sincerely,

Christopher Gilrein Executive Director, Northeast TechNet

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