



The League of Women Voters of Oregon, established in 1920, is a grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

May 7, 2025

To: [Senator Floyd Prozanski](#), Chair, [Senate Committee On Judiciary](#)

Re: [HB 2008 A](#) – Consumer (under 16) data protection, targeted ads, geolocation – **Support**

The League supports HB 2008, addressing consumer protections for consumers under 16 years old, also defining consumers’ geolocation exposure restrictions, based on our personal information protections:

- Prevent harmful uses of personal information by all information processors who collect, store, analyze, transfer, sell, etc.
- Expand the legal definition of “harm” to include physical, monetary, reputational, intangible, future, or other substantial injuries and to provide individuals the right to legal remedy.
- Expand personal information privacy definition to address rapidly changing information and communication technologies, accelerated networking between businesses, and automated collection and dissemination of data, which together subvert personally identifiable information, de-identification, re-identification, and data anonymization.

The statute housekeeping update of changing the consumer age description: “at least 13 years of age and not older than 15 years of age” to “**under 16 years of age**”. This consideration is made more practicably applicable with the bill’s specifying if the controller has “actual knowledge that, or willfully disregards whether, the consumer is under 16 years of age”. This mirrors consumer protection legislation work done in California, discussed in the Oregon Attorney General’s Consumer Privacy Task Force¹. some years ago. Adult protections were addressed, then children’s protections were separately defined. Then, realizing that the intervening teen years had been overlooked, the language was revised, similarly to the language seen here. We also support this for efficiency in government. Note, this is not a study.

For geolocation exposure, controllers may not sell personal data exposing where someone is or has been, to within about a third of a mile. For advertising and data sales, a scope greater than the specified 1,750 feet could be used. ² Note, selling personal data is not the same as providing emergency information. A “controller”³, is someone who “determines the purposes and means for processing personal data”. This past or present geolocation privacy is also defined in SB 619 Enrolled (2023) as sensitive data.

We urge your Support for HB 2008. Thank you for the opportunity to discuss this legislation.

Lisa Benton
President LWVOR

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Privacy, Cybersecurity

¹ Oregon Department of Justice Oregon Consumer Privacy Act – [SB 619 Enrolled](#) (2023).

<https://olis.oregonlegislature.gov/liz/2023R1/Downloads/PublicTestimonyDocument/59856#:~:text=The%20goal%20of%20this%20ask,control%20over%20their%20data%20privacy.>

² Oregon Passes Comprehensive Data Privacy Law. White & Case, 20 September, 2023. <https://www.whitecase.com/insight-alert/oregon-passes-comprehensive-data-privacy-law>

³ “Controller” means a person that, alone or jointly with another person, determines the purposes and means for processing personal data. (9) “Covered entity” has the meaning given that term in 45 C.F.R. 160.103, as in effect on the effective date of this 2023 Act. See page 2, [SB 619 Enrolled](#) 2023.