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

Reference Document :	Secure Controls Framework (SCF) version 2025.4		Focal Document:	Virginia Consumer Data Protection Act (CDPA)
STRM Guidance:	https://securecontrolsframework.com/set-theory-relationship-mapping-strm/		Focal Document URL:	https://law.lis.virginia.gov/vacodefull/title59.1/chapter53/
	Focal Document Element (FDE) Description		Published STRM URL:	https://securecontrolsframework.com/content/strm/scf-strm-us-state-va-cdpa.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
59.1-575	Definitions	See law for details	Functional	Subset Of	Standardized Terminology	SEA-02.1	Mechanisms exist to standardize technology and process terminology to reduce confusion amongst groups and departments.	10	
59.1-576	Scope; exemptions	See law for details	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-577.A	Personal data rights; consumers	A consumer may invoke the consumer rights authorized pursuant to this subsection at any time by submitting a request to a controller specifying the consumer rights the consumer wishes to invoke. A known child's parent or legal guardian may invoke such consumer rights on behalf of the child regarding processing personal data belonging to the known child. A controller shall comply with an authenticated consumer request to exercise the right:	Functional	Intersects With	Authorized Agent	PRI-03.6	Mechanisms exist to allow data subjects to authorize another person or entity, acting on the data subject's behalf, to make Personal Data (PD) processing decisions.	5	
59.1-577.A	Personal data rights; consumers	A consumer may invoke the consumer rights authorized pursuant to this subsection at any time by submitting a request to a controller specifying the consumer rights the consumer wishes to invoke. A known child's parent or legal guardian may invoke such consumer rights on behalf of the child regarding processing personal data belonging to the known child. A controller shall comply with an authenticated consumer request to exercise the right:	Functional	Intersects With	Active Participation By Data Subjects	PRI-03.7	Mechanisms exist to compel data subjects to select the level of consent deemed appropriate by the data subject for the relevant business purpose (e.g., opt-in, opt-out, accept all cookies, etc.).	5	
59.1-577.A	Personal data rights; consumers	A consumer may invoke the consumer rights authorized pursuant to this subsection at any time by submitting a request to a controller specifying the consumer rights the consumer wishes to invoke. A known child's parent or legal guardian may invoke such consumer rights on behalf of the child regarding processing personal data belonging to the known child. A controller shall comply with an authenticated consumer request to exercise the right:	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	
59.1-577.A.1	Personal data rights; consumers	To confirm whether or not a controller is processing the consumer's personal data and to access such personal data;	Functional	Subset Of	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.	10	
59.1-577.A.2	Personal data rights; consumers	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	Updating & Correcting Personal Data (PD)	DCH-22.1	Mechanisms exist to utilize technical controls to correct Personal Data (PD) that is inaccurate or outdated, incorrectly determined regarding impact, or incorrectly de-identified.	8	
59.1-577.A.2	Personal data rights; consumers	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	Subset Of	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.	10	
59.1-577.A.2	Personal data rights; consumers	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)	PRI-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.	8	
59.1-577.A.3	Personal data rights; consumers	To delete personal data provided by or obtained about the consumer;	Functional	Subset Of	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.	10	
59.1-577.A.3	Personal data rights; consumers	To delete personal data provided by or obtained about the consumer;	Functional	Intersects With	Right to Erasure	PRI-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	
59.1-577.A.4	Personal data rights; consumers	To obtain a copy of the consumer's personal data that the consumer previously provided to the controller in a portable and, to the extent technically feasible, readily usable format that allows the consumer to transmit the data to another controller without hindrance, where the processing is carried out by automated means; and	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	
59.1-577.A.4	Personal data rights; consumers	To obtain a copy of the consumer's personal data that the consumer previously provided to the controller in a portable and, to the extent technically feasible, readily usable format that allows the consumer to transmit the data to another controller without hindrance, where the processing is carried out by automated means; and	Functional	Intersects With	Data Portability	PRI-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	
59.1-577.A.4	Personal data rights; consumers	To obtain a copy of the consumer's personal data that the consumer previously provided to the controller in a portable and, to the extent technically feasible, readily usable format that allows the consumer to transmit the data to another controller without hindrance, where the processing is carried out by automated means; and	Functional	Intersects With	Personal Data (PD) Exports	PRI-06.7	Mechanisms exist to export a data subject's available Personal Data (PD) in a readily usable format, upon an authenticated request.	5	

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59.1-577.A.5	Personal data rights; consumers	To opt out of the processing of the personal data for purposes of (i) targeted advertising, (ii) the sale of personal data, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning the consumer.	Functional	Intersects With	Active Participation By Data Subjects	PRI-03.7	Mechanisms exist to compel data subjects to select the level of consent deemed appropriate by the data subject for the relevant business purpose (e.g., opt-in, opt-out, accept all cookies, etc.).	5	
59.1-577.A.5	Personal data rights; consumers	To opt out of the processing of the personal data for purposes of (i) targeted advertising, (ii) the sale of personal data, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning the consumer.	Functional	Intersects With	Notice of Right To Opt-Out	PRI-21	Mechanisms exist to include within the data privacy notice a notification to data subjects 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.	5	
59.1-577.A.5	Personal data rights; consumers	To opt out of the processing of the personal data for purposes of (i) targeted advertising, (ii) the sale of personal data, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning the consumer.	Functional	Intersects With	Opt-Out Links	PRI-21.1	Mechanisms exist to publish conspicuous links for data subjects to exercise their rights to:
(1) Limit the collection and/or use of Personal Data (PD); and
(2) Not sell or share PD.	5	
59.1-577.B	Personal data rights; consumers	Except as otherwise provided in this chapter, a controller shall comply with a request by a consumer to exercise the consumer rights authorized pursuant to subsection A as follows:	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-577.B.1	Personal data rights; consumers	A controller shall respond to the consumer without undue delay, but in all cases within 45 days of receipt of the request submitted pursuant to the methods described in subsection A. The response period may be extended once by 45 additional days when reasonably necessary, taking into account the complexity and number of the consumer's requests, so long as the controller informs the consumer of any such extension within the initial 45-day response period, together with the reason for the extension.	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	
59.1-577.B.2	Personal data rights; consumers	If a controller declines to take action regarding the consumer's request, the controller shall inform the consumer without undue delay, but in all cases and at the latest within 45 days of receipt of the request, of the justification for declining to take action and instructions for how to appeal the decision pursuant to subsection C.	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	
59.1-577.B.2	Personal data rights; consumers	If a controller declines to take action regarding the consumer's request, the controller shall inform the consumer without undue delay, but in all cases and at the latest within 45 days of receipt of the request, of the justification for declining to take action and instructions for how to appeal the decision pursuant to subsection C.	Functional	Intersects With	Data Subject Communications	PRI-17	Mechanisms exist to craft disclosures and communications to data subjects in a manner that is concise, unambiguous and understandable by a reasonable person.	5	
59.1-577.B.3	Personal data rights; consumers	Information provided in response to a consumer request shall be provided by a controller free of charge, up to twice annually per consumer. If requests from a consumer are manifestly unfounded, excessive, or repetitive, the controller may charge the consumer a reasonable fee to cover the administrative costs of complying with the request or decline to act on the request. The controller bears the burden of demonstrating the manifestly unfounded, excessive, or repetitive nature of the request.	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	
59.1-577.B.4	Personal data rights; consumers	If a controller is unable to authenticate the request using commercially reasonable efforts, the controller shall not be required to comply with a request to initiate an action under subsection A and may request that the consumer provide additional information reasonably necessary to authenticate the consumer and the consumer's request.	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	
59.1-577.B.5	Personal data rights; consumers	A controller that has obtained personal data about a consumer from a source other than the consumer shall be deemed in compliance with a consumer's request to delete such data pursuant to subdivision A 3 by either (i) retaining a record of the deletion request and the minimum data necessary for the purpose of ensuring the consumer's personal data remains deleted from the business's records and not using such retained data for any other purpose pursuant to the provisions of this chapter or (ii) opting the consumer out of the processing of such personal data for any purpose except for those exempted pursuant to the provisions of this chapter.	Functional	Intersects With	Data Subject Communications Documentation	PRI-17.3	Mechanisms exist to maintain records of data subject requests and responses in accordance with an established documentation retention schedule that adheres to applicable statutory, regulatory and/or contractual obligations.	3	
59.1-577.C	Personal data rights; consumers	A controller shall establish a process for a consumer to appeal the controller's refusal to take action on a request within a reasonable period of time after the consumer's receipt of the decision pursuant to subdivision B 2. The appeal process shall be conspicuously available and similar to the process for submitting requests to initiate action pursuant to subsection A. Within 60 days of receipt of an appeal, a controller shall inform the consumer in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, the controller shall also provide the consumer with an online mechanism, if available, or other method through which the consumer may contact the Attorney General to submit a complaint.	Functional	Intersects With	Appeal Adverse Decision	PRI-06.3	Mechanisms exist to maintain a process for data subjects to appeal an adverse decision.	5	
59.1-577.C	Personal data rights; consumers	A controller shall establish a process for a consumer to appeal the controller's refusal to take action on a request within a reasonable period of time after the consumer's receipt of the decision pursuant to subdivision B 2. The appeal process shall be conspicuously available and similar to the process for submitting requests to initiate action pursuant to subsection A. Within 60 days of receipt of an appeal, a controller shall inform the consumer in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If the appeal is denied, the controller shall also provide the consumer with an online mechanism, if available, or other method through which the consumer may contact the Attorney General to submit a complaint.	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	
59.1-577.1.A	Social media platforms; responsibilities and prohibitions related to minors	For purposes of this section, "minor" means any natural person younger than 16 years of age.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-577.1.B	Social media platforms; responsibilities and prohibitions related to minors	Any controller or processor that operates a social media platform shall (i) use commercially reasonable methods, such as a neutral age screen mechanism, to determine whether a user is a minor and (ii) limit a minor's use of such social media platform to one hour per day, per service or application, and allow a parent to give verifiable parental consent to increase or decrease the daily time limit.	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.	5	
59.1-577.1.C	Social media platforms; responsibilities and prohibitions related to minors	Information collected for the purpose of determining a user's age shall not be used for any purpose other than age determination and provision of age-appropriate experiences. For purposes of this section, any controller or processor that operates a social media platform shall treat a user as a minor if the user's device communicates or signals that the user is or shall be treated as a minor, including through a browser plug-in or privacy setting, device setting, or other mechanism.	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.	5	
59.1-577.1.C	Social media platforms; responsibilities and prohibitions related to minors	Information collected for the purpose of determining a user's age shall not be used for any purpose other than age determination and provision of age-appropriate experiences. For purposes of this section, any controller or processor that operates a social media platform shall treat a user as a minor if the user's device communicates or signals that the user is or shall be treated as a minor, including through a browser plug-in or privacy setting, device setting, or other mechanism.	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.		
59.1-577.1.C	Social media platforms; responsibilities and prohibitions related to minors	Information collected for the purpose of determining a user's age shall not be used for any purpose other than age determination and provision of age-appropriate experiences. For purposes of this section, any controller or processor that operates a social media platform shall treat a user as a minor if the user's device communicates or signals that the user is or shall be treated as a minor, including through a browser plug-in or privacy setting, device setting, or other mechanism.	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to:
(1) The purpose(s) originally collected, consistent with the data privacy notice(s);
(2) What is authorized by the data subject, or authorized agent; and
(3) What is consistent with applicable laws, regulations and contractual obligations.		
59.1-577.1.D	Social media platforms; responsibilities and prohibitions related to minors	Nothing in this section shall be construed as requiring any controller or processor that operates a social media platform to give a parent who grants verifiable parental consent pursuant to subsection B any additional or special access to or control over the data or accounts of the minor.	Functional	Intersects With	Authorized Agent	PRI-03.6	Mechanisms exist to allow data subjects to authorize another person or entity, acting on the data subject's behalf, to make Personal Data (PD) processing decisions.	5	

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59.1-577.1.E	Social media platforms; responsibilities and prohibitions related to minors	No controller or processor that operates a social media platform shall withhold, degrade, lower the quality of, or increase the price of any online service, product, or feature to a user due to the controller or processor not being permitted to provide use of such social media platform beyond the one hour per day, per service or application, daily time limit under subsection B. However, nothing in this section shall be construed as (i) requiring a social media platform to provide an online service, product, or feature that requires the personal information of a known minor or (ii) prohibiting a social media platform from offering a different price, rate, level, quality, or selection of goods or services to a known minor, including offering goods or services for no fee, if such behavior is reasonably related to the exercise of rights pursuant to or compliance with the requirements of this chapter.	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.	5	
59.1-577.1.E	Social media platforms; responsibilities and prohibitions related to minors	No controller or processor that operates a social media platform shall withhold, degrade, lower the quality of, or increase the price of any online service, product, or feature to a user due to the controller or processor not being permitted to provide use of such social media platform beyond the one hour per day, per service or application, daily time limit under subsection B. However, nothing in this section shall be construed as (i) requiring a social media platform to provide an online service, product, or feature that requires the personal information of a known minor or (ii) prohibiting a social media platform from offering a different price, rate, level, quality, or selection of goods or services to a known minor, including offering goods or services for no fee, if such behavior is reasonably related to the exercise of rights pursuant to or compliance with the requirements of this chapter.	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.	8	
59.1-578.A	Data controller responsibilities; transparency	A controller shall:	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-578.A.1	Data controller responsibilities; transparency	Limit the collection of personal data to what is adequate, relevant, and reasonably necessary in relation to the purposes for which such data is processed, as disclosed to the consumer;	Functional	Intersects With	Restrict Collection To Identified Purpose	PRI-04	Mechanisms exist to minimize the collection of Personal Data (PD) to only what is adequate, relevant and limited to the purposes identified in the data privacy notice, including protections against collecting PD from minors without appropriate parental or legal guardian consent.	5	
59.1-578.A.2	Data controller responsibilities; transparency	Except as otherwise provided in this chapter, not process personal data for purposes that are neither reasonably necessary to nor compatible with the disclosed purposes for which such personal data is processed, as disclosed to the consumer, unless the controller obtains the consumer's consent;	Functional	Subset Of	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	10	
59.1-578.A.3	Data controller responsibilities; transparency	Establish, implement, and maintain reasonable administrative, technical, and physical data security practices to protect the confidentiality, integrity, and accessibility of personal data. Such data security practices shall be appropriate to the volume and nature of the personal data at issue;	Functional	Intersects With	Data Privacy Program	PRI-01	Mechanisms exist to facilitate the implementation and operation of data protection controls throughout the data lifecycle to ensure all forms of Personal Data (PD) are processed lawfully, fairly and transparently.	8	
59.1-578.A.3	Data controller responsibilities; transparency	Establish, implement, and maintain reasonable administrative, technical, and physical data security practices to protect the confidentiality, integrity, and accessibility of personal data. Such data security practices shall be appropriate to the volume and nature of the personal data at issue;	Functional	Subset Of	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.	10	
59.1-578.A.4	Data controller responsibilities; transparency	Not process personal data in violation of state and federal laws that prohibit unlawful discrimination against consumers. A controller shall not discriminate against a consumer for exercising any of the consumer rights contained in this chapter, including denying goods or services, charging different prices or rates for goods or services, or providing a different level of quality of goods and services to the consumer. However, nothing in this subdivision 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 consumer has exercised his right to opt out pursuant to § 59.1-577 or the offer is related to a consumer's voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program; and	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.	5	
59.1-578.A.4	Data controller responsibilities; transparency	Not process personal data in violation of state and federal laws that prohibit unlawful discrimination against consumers. A controller shall not discriminate against a consumer for exercising any of the consumer rights contained in this chapter, including denying goods or services, charging different prices or rates for goods or services, or providing a different level of quality of goods and services to the consumer. However, nothing in this subdivision 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 consumer has exercised his right to opt out pursuant to § 59.1-577 or the offer is related to a consumer's voluntary participation in a bona fide loyalty, rewards, premium features, discounts, or club card program; and	Functional	Subset Of	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.	10	
59.1-578.A.5	Data controller responsibilities; transparency	Not process sensitive data concerning a consumer without obtaining the consumer's consent, or, in the case of the processing of sensitive data concerning a known child, without processing such data in accordance with the federal Children's Online Privacy Protection Act (15 U.S.C. § 6501 et seq.).	Functional	Subset Of	Choice & Consent	PRI-03	Mechanisms exist to enable data subjects to authorize the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of their Personal Data (PD), where prior to collection the data subject is provided with: (1) Plain language to illustrate the potential data privacy risks of the authorization; (2) A means for users to decline the authorization; and (3) All necessary choice and consent-related criteria required by applicable statutory, regulatory and contractual obligations.	10	
59.1-578.A.5	Data controller responsibilities; transparency	Not process sensitive data concerning a consumer without obtaining the consumer's consent, or, in the case of the processing of sensitive data concerning a known child, without processing such data in accordance with the federal Children's Online Privacy Protection Act (15 U.S.C. § 6501 et seq.).	Functional	Intersects With	Authorized Agent	PRI-03.6	Mechanisms exist to allow data subjects to authorize another person or entity, acting on the data subject's behalf, to make Personal Data (PD) processing decisions.	3	
59.1-578.B	Data controller responsibilities; transparency	Any provision of a contract or agreement of any kind that purports to waive or limit in any way consumer rights pursuant to § 59.1-577 shall be deemed contrary to public policy and shall be void and unenforceable.	Functional	Subset Of	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	10	
59.1-578.C	Data controller responsibilities; transparency	Controllers shall provide consumers with a reasonably accessible, clear, and meaningful privacy notice that includes:	Functional	Subset Of	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.	10	

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59.1-578.C.1	Data controller responsibilities; transparency	The categories of personal data processed by the controller;	Functional	Subset Of	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.	10	
59.1-578.C.2	Data controller responsibilities; transparency	The purpose for processing personal data;	Functional	Subset Of	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.	10	
59.1-578.C.2	Data controller responsibilities; transparency	The purpose for processing personal data;	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	
59.1-578.C.3	Data controller responsibilities; transparency	How consumers may exercise their consumer rights pursuant to § 59.1-577, including how a consumer may appeal a controller's decision with regard to the consumer's request;	Functional	Subset Of	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.	10	
59.1-578.C.4	Data controller responsibilities; transparency	The categories of personal data that the controller shares with third parties, if any; and	Functional	Subset Of	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.	10	
59.1-578.C.4	Data controller responsibilities; transparency	The categories of personal data that the controller shares with third parties, if any; and	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	
59.1-578.C.5	Data controller responsibilities; transparency	The categories of third parties, if any, with whom the controller shares personal data.	Functional	Subset Of	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.	10	
59.1-578.C.5	Data controller responsibilities; transparency	The categories of third parties, if any, with whom the controller shares personal data.	Functional	Intersects With	Third-Party Inventories	TPM-01.1	Mechanisms exist to maintain a current, accurate and complete list of External Service Providers (ESPs) that can potentially impact the Confidentiality, Integrity, Availability and/or Safety (CIAS) of the organization's Technology Assets, Applications, Services and/or Data (TAASD).	5	
59.1-578.D	Data controller responsibilities; transparency	If a controller sells personal data to third parties or processes personal data for targeted advertising, the controller shall clearly and conspicuously disclose such processing, as well as the manner in which a consumer may exercise the right to opt out of such processing.	Functional	Subset Of	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.	10	
59.1-578.D	Data controller responsibilities; transparency	If a controller sells personal data to third parties or processes personal data for targeted advertising, the controller shall clearly and conspicuously disclose such processing, as well as the manner in which a consumer may exercise the right to opt out of such processing.	Functional	Intersects With	Choice & Consent	PRI-03	Mechanisms exist to enable data subjects to authorize the collection, receiving, processing, storage, transmission, sharing, updating and/or disposal of their Personal Data (PD), where prior to collection the data subject is provided with: (1) Plain language to illustrate the potential data privacy risks of the authorization; (2) A means for users to decline the authorization; and (3) All necessary choice and consent-related criteria required by applicable statutory, regulatory and contractual obligations.	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
59.1-578.E	Data controller responsibilities; transparency	A controller shall establish, and shall describe in a privacy notice, one or more secure and reliable means for consumers to submit a request to exercise their consumer rights under this chapter. Such means shall take into account the ways in which consumers normally interact with the controller, the need for secure and reliable communication of such requests, 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 § 59.1-577 but may require a consumer to use an existing account.	Functional	Subset Of	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.	10	
59.1-578.F	Data controller responsibilities; transparency	N/A	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-578.F.1	Data controller responsibilities; transparency	Subject to the consent requirement established by subdivision 3, no controller shall process any personal data collected from a known child:	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	
59.1-578.F.1	Data controller responsibilities; transparency	Subject to the consent requirement established by subdivision 3, no controller shall process any personal data collected from a known child:	Functional	Intersects With	Data Subject Opt-In Consent	PRI-03.12	Mechanisms exist to obtain consent from data subjects to opt-in for the following Personal Data (PD) actions: (1) Collecting; (2) Receiving; (3) Processing; (4) Storing; (5) Transmitting; (6) Sharing; and/or (7) Updating.	5	
59.1-578.F.1	Data controller responsibilities; transparency	Subject to the consent requirement established by subdivision 3, no controller shall process any personal data collected from a known child:	Functional	Intersects With	Parent or Guardian Opt-In Consent For Minors	PRI-03.13	Mechanisms exist to obtain parental or guardian consent for Personal Data (PD) processing actions through reasonable consumer expectations, when the data subject is a minor.	5	
59.1-578.F.1	Data controller responsibilities; transparency	Subject to the consent requirement established by subdivision 3, no controller shall process any personal data collected from a known child:	Functional	Intersects With	Restrict Collection To Identified Purpose	PRI-04	Mechanisms exist to minimize the collection of Personal Data (PD) to only what is adequate, relevant and limited to the purposes identified in the data privacy notice, including protections against collecting PD from minors without appropriate parental or legal guardian consent.	5	
59.1-578.F.1.a	Data controller responsibilities; transparency	For the purposes of (i) targeted advertising, (ii) the sale of such personal data, or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning a consumer;	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	
59.1-578.F.1.b	Data controller responsibilities; transparency	Unless such processing is reasonably necessary to provide the online service, product, or feature;	Functional	Intersects With	Authority To Collect, Process, Store & Share Personal Data (PD)	PRI-04.1	Mechanisms exist to determine and document the legal authority that permits the organization to collect, receive, process, store, transmit, share, update and/or dispose Personal Data (PD), either generally or in support of a specific business process.	5	
59.1-578.F.1.b	Data controller responsibilities; transparency	Unless such processing is reasonably necessary to provide the online service, product, or feature;	Functional	Intersects With	Data Subject Opt-In Consent	PRI-03.12	Mechanisms exist to obtain consent from data subjects to opt-in for the following Personal Data (PD) actions: (1) Collecting; (2) Receiving; (3) Processing; (4) Storing; (5) Transmitting; (6) Sharing; and/or (7) Updating.	5	
59.1-578.F.1.b	Data controller responsibilities; transparency	Unless such processing is reasonably necessary to provide the online service, product, or feature;	Functional	Intersects With	Parent or Guardian Opt-In Consent For Minors	PRI-03.13	Mechanisms exist to obtain parental or guardian consent for Personal Data (PD) processing actions through reasonable consumer expectations, when the data subject is a minor.	5	
59.1-578.F.1.c	Data controller responsibilities; transparency	For any processing purpose other than the processing purpose that the controller disclosed at the time such controller collected such personal data or that is reasonably necessary for and compatible with such disclosed purpose; or	Functional	Intersects With	Restrict Collection To Identified Purpose	PRI-04	Mechanisms exist to minimize the collection of Personal Data (PD) to only what is adequate, relevant and limited to the purposes identified in the data privacy notice, including protections against collecting PD from minors without appropriate parental or legal guardian consent.	5	
59.1-578.F.1.c	Data controller responsibilities; transparency	For any processing purpose other than the processing purpose that the controller disclosed at the time such controller collected such personal data or that is reasonably necessary for and compatible with such disclosed purpose; or	Functional	Intersects With	Authority To Collect, Process, Store & Share Personal Data (PD)	PRI-04.1	Mechanisms exist to determine and document the legal authority that permits the organization to collect, receive, process, store, transmit, share, update and/or dispose Personal Data (PD), either generally or in support of a specific business process.	5	
59.1-578.F.1.c	Data controller responsibilities; transparency	For any processing purpose other than the processing purpose that the controller disclosed at the time such controller collected such personal data or that is reasonably necessary for and compatible with such disclosed purpose; or	Functional	Intersects With	Usage Restrictions of Personal Data (PD)	PRI-05.4	Mechanisms exist to restrict collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) to: (1) The purpose(s) originally collected, consistent with the data privacy notice(s); (2) What is authorized by the data subject, or authorized agent; and (3) What is consistent with applicable laws, regulations and contractual obligations.	5	
59.1-578.F.1.d	Data controller responsibilities; transparency	For longer than is reasonably necessary to provide the online service, product, or feature.	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.	5	
59.1-578.F.1.d	Data controller responsibilities; transparency	For longer than is reasonably necessary to provide the online service, product, or feature.	Functional	Intersects With	Continued Use of Personal Data (PD)	PRI-03.9	Mechanisms exist to govern the continued use of Personal Data (PD) as it is collected, received, processed, stored, transmitted, shared and/or updated until: (1) Disposal of PD occurs when there is no longer a legitimate business purpose; (2) Disposal of PD occurs when the data retention timeline for the use case is met; and/or (3) Continued use of PD is prohibited upon withdrawal of data subject consent.	5	
59.1-578.F.2	Data controller responsibilities; transparency	Subject to the consent requirement established by subdivision 3, no controller shall collect precise geolocation data from a known child unless (i) such precise geolocation data is reasonably necessary for the controller to provide an online service, product, or feature and, if such data is necessary to provide such online service, product, or feature, such controller shall only collect such data for the time necessary to provide such online service, product, or feature and (ii) the controller provides to the known child a signal indicating that such controller is collecting such precise geolocation data, which signal shall be available to such known child for the entire duration of such collection.	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.	5	
59.1-578.F.2	Data controller responsibilities; transparency	Subject to the consent requirement established by subdivision 3, no controller shall collect precise geolocation data from a known child unless (i) such precise geolocation data is reasonably necessary for the controller to provide an online service, product, or feature and, if such data is necessary to provide such online service, product, or feature, such controller shall only collect such data for the time necessary to provide such online service, product, or feature and (ii) the controller provides to the known child a signal indicating that such controller is collecting such precise geolocation data, which signal shall be available to such known child for the entire duration of such collection.	Functional	Intersects With	Restrict Collection To Identified Purpose	PRI-04	Mechanisms exist to minimize the collection of Personal Data (PD) to only what is adequate, relevant and limited to the purposes identified in the data privacy notice, including protections against collecting PD from minors without appropriate parental or legal guardian consent.	5	
59.1-578.F.3	Data controller responsibilities; transparency	No controller shall engage in the activities described in subdivisions 1 or 2 unless the controller obtains consent from the child's parent or legal guardian in accordance with the federal Children's Online Privacy Protection Act (15 U.S.C. § 6501 et seq.).	Functional	Intersects With	Authorized Agent	PRI-03.6	Mechanisms exist to allow data subjects to authorize another person or entity, acting on the data subject's behalf, to make Personal Data (PD) processing decisions.	5	
59.1-579.A	Responsibility according to role; controller and processor	A processor shall adhere to the instructions of a controller and shall assist the controller in meeting its obligations under this chapter. Such assistance shall include:	Functional	Subset Of	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	10	

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
59.1-579.A.1	Responsibility according to role; controller and processor	Taking into account the nature of processing and the information available to the processor, by appropriate technical and organizational measures, insofar as this is reasonably practicable, to fulfill the controller's obligation to respond to consumer rights requests pursuant to § 59.1-577.	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.	5	
59.1-579.A.1	Responsibility according to role; controller and processor	Taking into account the nature of processing and the information available to the processor, by appropriate technical and organizational measures, insofar as this is reasonably practicable, to fulfill the controller's obligation to respond to consumer rights requests pursuant to § 59.1-577.	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.	5	
59.1-579.A.1	Responsibility according to role; controller and processor	Taking into account the nature of processing and the information available to the processor, by appropriate technical and organizational measures, insofar as this is reasonably practicable, to fulfill the controller's obligation to respond to consumer rights requests pursuant to § 59.1-577.	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	
59.1-579.A.2	Responsibility according to role; controller and processor	Taking into account the nature of processing and the information available to the processor, by assisting the controller in meeting the controller's obligations in relation to the security of processing the personal data and in relation to the notification of a breach of security of the system of the processor pursuant to § 18.2-186.6 in order to meet the controller's obligations.	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.	5	
59.1-579.A.2	Responsibility according to role; controller and processor	Taking into account the nature of processing and the information available to the processor, by assisting the controller in meeting the controller's obligations in relation to the security of processing the personal data and in relation to the notification of a breach of security of the system of the processor pursuant to § 18.2-186.6 in order to meet the controller's obligations.	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	
59.1-579.A.3	Responsibility according to role; controller and processor	Providing necessary information to enable the controller to conduct and document data protection assessments pursuant to § 59.1-580.	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.	5	
59.1-579.A.3	Responsibility according to role; controller and processor	Providing necessary information to enable the controller to conduct and document data protection assessments pursuant to § 59.1-580.	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	
59.1-579.B	Responsibility according to role; controller and processor	A contract between a controller and a processor shall govern the processor's data processing procedures with respect to processing performed on behalf of the controller. The contract shall be binding and clearly set forth instructions for processing data, the nature and purpose of processing, the type of data subject to processing, the duration of processing, and the rights and obligations of both parties. The contract shall also include requirements that the processor shall:	Functional	Intersects With	Binding Corporate Rules (BCR)	PRI-01.5	Mechanisms exist to implement and manage Binding Corporate Rules (BCR) (e.g., data sharing agreement) to legally-bind all parties engaged in a joint economic activity that contractually states enforceable rights on data subjects with regard to the processing of their personal data.	5	
59.1-579.B	Responsibility according to role; controller and processor	A contract between a controller and a processor shall govern the processor's data processing procedures with respect to processing performed on behalf of the controller. The contract shall be binding and clearly set forth instructions for processing data, the nature and purpose of processing, the type of data subject to processing, the duration of processing, and the rights and obligations of both parties. The contract shall also include requirements that the processor shall:	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	
59.1-579.B.1	Responsibility according to role; controller and processor	Ensure that each person processing personal data is subject to a duty of confidentiality with respect to the data;	Functional	Subset Of	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.	10	
59.1-579.B.2	Responsibility according to role; controller and processor	At the controller's direction, 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	Intersects With	Cease Processing, Storing and/or Sharing Personal Data (PD)	PRI-03.10	Mechanisms exist to ensure the organization ceases collecting, receiving, processing, storing, transmitting, sharing and/or updating Personal Data (PD) upon receiving a data subject's consent revocation.	5	
59.1-579.B.2	Responsibility according to role; controller and processor	At the controller's direction, 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	Intersects With	Obligation To Inform Third-Parties	PRI-07.3	Mechanisms exist to inform applicable third-parties of any modification, deletion or other change that affects shared Personal Data (PD).	5	
59.1-579.B.3	Responsibility according to role; controller and processor	Upon the reasonable request of the controller, make available to the controller all information in its possession necessary to demonstrate the processor's compliance with the obligations in this chapter;	Functional	Subset Of	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	10	
59.1-579.B.4	Responsibility according to role; controller and processor	Allow, and cooperate with, reasonable assessments by the controller or the controller's designated assessor; alternatively, the processor may arrange for a qualified and independent assessor to conduct an assessment of the processor's policies and technical and organizational measures in support of the obligations under this chapter using an appropriate and accepted control standard or framework and assessment procedure for such assessments. The processor shall provide a report of such assessment to the controller upon request; and	Functional	Intersects With	Conformity Assessment	CPL-01.4	Mechanisms exist to conduct assessments to demonstrate conformity with applicable cybersecurity and data protection laws, regulations and/or contractual obligations.	5	
59.1-579.B.4	Responsibility according to role; controller and processor	Allow, and cooperate with, reasonable assessments by the controller or the controller's designated assessor; alternatively, the processor may arrange for a qualified and independent assessor to conduct an assessment of the processor's policies and technical and organizational measures in support of the obligations under this chapter using an appropriate and accepted control standard or framework and assessment procedure for such assessments. The processor shall provide a report of such assessment to the controller upon request; and	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	
59.1-579.B.5	Responsibility according to role; controller and processor	Engage any subcontractor pursuant to a written contract in accordance with subsection C that requires the subcontractor to meet the obligations of the processor with respect to the personal data.	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	
59.1-579.B.5	Responsibility according to role; controller and processor	Engage any subcontractor pursuant to a written contract in accordance with subsection C that requires the subcontractor to meet the obligations of the processor with respect to the personal data.	Functional	Intersects With	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity and data protection requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	5	
59.1-579.B.5	Responsibility according to role; controller and processor	Engage any subcontractor pursuant to a written contract in accordance with subsection C that requires the subcontractor to meet the obligations of the processor with respect to the personal data.	Functional	Intersects With	Contract Flow-Down Requirements	TPM-05.2	Mechanisms exist to ensure cybersecurity and data protection requirements are included in contracts that flow-down to applicable sub-contractors and suppliers.	5	
59.1-579.C	Responsibility according to role; controller and processor	Nothing in this section shall be construed to relieve a controller or a processor from the liabilities imposed on it by virtue of its role in the processing relationship as defined by this chapter.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-579.D	Responsibility according to role; controller and processor	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 is to be processed. A processor that continues to adhere to a controller's instructions with respect to a specific processing of personal data remains a processor.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-580.A	Data protection assessments	A controller shall conduct and document a data protection assessment of each of the following processing activities involving personal data:	Functional	Subset Of	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	10	
59.1-580.A.1	Data protection assessments	The processing of personal data for purposes of targeted advertising;	Functional	Subset Of	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	10	
59.1-580.A.2	Data protection assessments	The sale of personal data;	Functional	Subset Of	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	10	
59.1-580.A.3	Data protection assessments	The processing of personal data for purposes of profiling, where such profiling presents a reasonably foreseeable risk of (i) unfair or deceptive treatment of, or unlawful disparate impact on, consumers; (ii) financial, physical, or reputational injury to consumers; (iii) a physical or other intrusion upon the solitude or seclusion, or the private affairs or concerns, of consumers, where such intrusion would be offensive to a reasonable person; or (iv) other substantial injury to consumers;	Functional	Subset Of	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	10	

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
59.1-580.A.4	Data protection assessments	The processing of sensitive data; and	Functional	Subset Of	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	10	
59.1-580.A.5	Data protection assessments	Any processing activities involving personal data that present a heightened risk of harm to consumers.	Functional	Subset Of	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	10	
59.1-580.B	Data protection assessments	Each controller that offers any online service, product, or feature directed to consumers whom such controller has actual knowledge are children shall conduct a data protection assessment for such online service, product, or feature that addresses (i) the purpose of such online service, product, or feature; (ii) the categories of known children's personal data that such online service, product, or feature processes; and (iii) the purposes for which such controller processes known children's personal data with respect to such online service, product, or feature.	Functional	Subset Of	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	10	
59.1-580.C	Data protection assessments	Data protection assessments conducted pursuant to subsection A shall identify and weigh the benefits that may flow, directly and indirectly, from the processing to the controller, the consumer, other stakeholders, and the public against the potential risks to the rights of the consumer associated with such processing, as mitigated by safeguards that can be employed by the controller to reduce such risks. The use of de-identified data and the reasonable expectations of consumers, as well as the context of the processing and the relationship between the controller and the consumer whose personal data will be processed, shall be factored into this assessment by the controller.	Functional	Intersects With	Cybersecurity & Data Protection Status Reporting	GOV-17	Mechanisms exist to submit status reporting of the organization's cybersecurity and/or data privacy program to applicable statutory and/or regulatory authorities, as required.	8	
59.1-580.C	Data protection assessments	Data protection assessments conducted pursuant to subsection A shall identify and weigh the benefits that may flow, directly and indirectly, from the processing to the controller, the consumer, other stakeholders, and the public against the potential risks to the rights of the consumer associated with such processing, as mitigated by safeguards that can be employed by the controller to reduce such risks. The use of de-identified data and the reasonable expectations of consumers, as well as the context of the processing and the relationship between the controller and the consumer whose personal data will be processed, shall be factored into this assessment by the controller.	Functional	Subset Of	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	10	
59.1-580.D	Data protection assessments	The Attorney General may request, pursuant to a civil investigative demand, that a controller disclose any data protection assessment that is relevant to an investigation conducted by the Attorney General, and the controller shall make the data protection assessment available to the Attorney General. The Attorney General may evaluate the data protection assessment for compliance with the responsibilities set forth in § 59.1-578. Data protection assessments shall be confidential and exempt from public inspection and copying under the Virginia Freedom of Information Act (§ 2.2-3700 et seq.). The disclosure of a data protection assessment pursuant to a request from the Attorney General shall not constitute a waiver of attorney-client privilege or work product protection with respect to the assessment and any information contained in the assessment.	Functional	Subset Of	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	10	
59.1-580.E	Data protection assessments	A single data protection assessment may address a comparable set of processing operations that include similar activities.	Functional	Subset Of	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	10	
59.1-580.F	Data protection assessments	Data protection assessments conducted by a controller for the purpose of compliance with other laws or regulations may comply under this section if the assessments have a reasonably comparable scope and effect.	Functional	Subset Of	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	10	
59.1-580.G	Data protection assessments	Data protection assessment requirements shall apply to processing activities created or generated after January 1, 2023, and are not retroactive.	Functional	Subset Of	Data Protection Impact Assessment (DPIA)	RSK-10	Mechanisms exist to conduct a Data Protection Impact Assessment (DPIA) on Technology Assets, Applications and/or Services (TAAS) that store, process and/or transmit Personal Data (PD) to identify and remediate reasonably-expected risks.	10	
59.1-581.A	Processing de-identified data; exemptions	The controller in possession of de-identified data shall:	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-581.A.1	Processing de-identified data; exemptions	Take reasonable measures to ensure that the data cannot be associated with a natural person;	Functional	Intersects With	De-Identification (Anonymization)	DCH-23	Mechanisms exist to anonymize data by removing Personal Data (PD) from datasets.	5	
59.1-581.A.1	Processing de-identified data; exemptions	Take reasonable measures to ensure that the data cannot be associated with a natural person;	Functional	Intersects With	Data Masking	PRI-05.3	Mechanisms exist to mask sensitive/regulated data through data anonymization, pseudonymization, redaction or de-identification.	5	
59.1-581.A.2	Processing de-identified data; exemptions	Publicly commit to maintaining and using de-identified data without attempting to re-identify the data; and	Functional	Intersects With	Dissemination of Data Privacy Program Information	PRI-01.3	Mechanisms exist to:
(1) Ensure that the public has access to information about organizational data privacy activities and can communicate with its Chief Privacy Officer (CPO) or similar role;
(2) Ensure that organizational data privacy practices are publicly available through organizational websites or document repositories;
(3) Utilize publicly facing email addresses and/or phone lines to enable the public to provide feedback and/or direct questions to data privacy office(s) regarding data privacy practices; and
(4) Inform data subjects when changes are made to the privacy notice and the nature of such changes.	5	
59.1-581.A.2	Processing de-identified data; exemptions	Publicly commit to maintaining and using de-identified data without attempting to re-identify the data; and	Functional	Subset Of	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.	10	
59.1-581.A.3	Processing de-identified data; exemptions	Contractually obligate any recipients of the de-identified data to comply with all provisions of this chapter.	Functional	Subset Of	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	10	
59.1-581.B	Processing de-identified data; exemptions	Nothing in this chapter shall be construed to (i) require a controller or processor to re-identify de-identified data or pseudonymous data or (ii) maintain data in identifiable form, or collect, obtain, retain, or access any data or technology, in order to be capable of associating an authenticated consumer request with personal data.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-581.C	Processing de-identified data; exemptions	Nothing in this chapter shall be construed to require a controller or processor to comply with an authenticated consumer rights request, pursuant to § 59.1-577, if all of the following are true:	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-581.C.1	Processing de-identified data; exemptions	The controller is not reasonably capable of associating the request with the personal data or 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	N/A	No requirements to map to.
59.1-581.C.2	Processing de-identified data; exemptions	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	N/A	No requirements to map to.
59.1-581.C.3	Processing de-identified data; exemptions	The controller does not sell the personal data to any third party or otherwise voluntarily disclose the personal data to any third party other than a processor, except as otherwise permitted in this section.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-581.C.3	Processing de-identified data; exemptions	The controller does not sell the personal data to any third party or otherwise voluntarily disclose the personal data to any third party other than a processor, except as otherwise permitted in this section.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.

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
59.1-581.D	Processing de-identified data; exemptions	The consumer rights contained in subdivisions A 1 through 4 of § 59.1-577 and § 59.1-578 shall not apply to pseudonymous data in cases where the controller is able to demonstrate any information necessary to identify the consumer is kept separately and is subject to effective technical and organizational controls that prevent the controller from accessing such information.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-581.E	Processing de-identified data; exemptions	A controller that discloses pseudonymous data or de-identified data shall exercise reasonable oversight to monitor compliance with any contractual commitments to which the pseudonymous data or de-identified data is subject and shall take appropriate steps to address any breaches of those contractual commitments.	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	
59.1-581.E	Processing de-identified data; exemptions	A controller that discloses pseudonymous data or de-identified data shall exercise reasonable oversight to monitor compliance with any contractual commitments to which the pseudonymous data or de-identified data is subject and shall take appropriate steps to address any breaches of those contractual commitments.	Functional	Intersects With	Data Privacy Requirements for Contractors & Service Providers	PRI-07.1	Mechanisms exist to include data privacy requirements in contracts and other acquisition-related documents that establish data privacy roles and responsibilities for contractors and service providers.	5	
59.1-582.A	Limitations	Nothing in this chapter shall be construed to restrict a controller's or processor's ability to:	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.A.1	Limitations	Comply with federal, state, or local laws, rules, or regulations;	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.A.2	Limitations	Comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, local, or other governmental authorities;	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.A.3	Limitations	Cooperate with law-enforcement agencies concerning conduct or activity that the controller or processor reasonably and in good faith believes may violate federal, state, or local laws, rules, or regulations;	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.A.4	Limitations	Investigate, establish, exercise, prepare for, or defend legal claims;	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.A.5	Limitations	Provide a product or service specifically requested by a consumer, perform a contract to which the consumer is a party, including fulfilling the terms of a written warranty, or take steps at the request of the consumer prior to entering into a contract;	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.A.6	Limitations	Take immediate steps to protect an interest that is essential for the life or physical safety of the consumer or of another natural person, and where the processing cannot be manifestly based on another legal basis;	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.A.7	Limitations	Prevent, detect, protect against, or respond to security incidents, identity theft, fraud, harassment, malicious or deceptive activities, or any illegal activity; preserve the integrity or security of systems; or investigate, report, or prosecute those responsible for any such action;	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.A.8	Limitations	Engage in public or peer-reviewed scientific or statistical research in the public interest that adheres to all other applicable ethics and privacy laws and is approved, monitored, and governed by an institutional review board, or similar independent oversight entities that determine: (i) if the deletion of the information is likely to provide substantial benefits that do not exclusively accrue to the controller; (ii) the expected benefits of the research outweigh the privacy risks; and (iii) if the controller has implemented reasonable safeguards to mitigate privacy risks associated with research, including any risks associated with reidentification; or	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.A.9	Limitations	Assist another controller, processor, or third party with any of the obligations under this subsection.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.B	Limitations	The obligations imposed on controllers or processors under this chapter shall not restrict a controller's or processor's ability to collect, use, or retain data to:	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.B.1	Limitations	Conduct internal research to develop, improve, or repair products, services, or technology;	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.B.2	Limitations	Effectuate a product recall;	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.B.3	Limitations	Identify and repair technical errors that impair existing or intended functionality; or	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.B.4	Limitations	Perform internal operations that are reasonably aligned with the expectations of the consumer or reasonably anticipated based on the consumer's existing relationship with the controller or are otherwise compatible with processing data in furtherance of the provision of a product or service specifically requested by a consumer or the performance of a contract to which the consumer is a party.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.C	Limitations	The obligations imposed on controllers or processors under this chapter shall not apply where compliance by the controller or processor with this chapter would violate an evidentiary privilege under the laws of the Commonwealth. Nothing in this chapter shall be construed to prevent a controller or processor from providing personal data concerning a consumer to a person covered by an evidentiary privilege under the laws of the Commonwealth as part of a privileged communication.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.D	Limitations	A controller or processor that discloses personal data to a third-party controller or processor, in compliance with the requirements of this chapter, is not in violation of this chapter if the third-party controller or processor that receives and processes such personal data is in violation of this chapter, provided that, at the time of disclosing the personal data, the disclosing controller or processor did not have actual knowledge that the recipient intended to commit a violation. A third-party controller or processor receiving personal data from a controller or processor in compliance with the requirements of this chapter is likewise not in violation of this chapter for the transgressions of the controller or processor from which it receives such personal data.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.E	Limitations	Nothing in this chapter shall be construed as an obligation imposed on controllers and processors that adversely affects the rights or freedoms of any persons, such as exercising the right of free speech pursuant to the First Amendment to the United States Constitution, or applies to the processing of personal data by a person in the course of a purely personal or household activity.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.F	Limitations	Personal data processed by a controller pursuant to this section shall not be processed for any purpose other than those expressly listed in this section unless otherwise allowed by this chapter. Personal data processed by a controller pursuant to this section may be processed to the extent that such processing is:	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.F.1	Limitations	Reasonably necessary and proportionate to the purposes listed in this section; and	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.F.2	Limitations	Adequate, relevant, and limited to what is necessary in relation to the specific purposes listed in this section. Personal data collected, used, or retained pursuant to subsection B shall, where applicable, take into account the nature and purpose or purposes of such collection, use, or retention. Such data shall be subject to reasonable administrative, technical, and physical measures to protect the confidentiality, integrity, and accessibility of the personal data and to reduce reasonably foreseeable risks of harm to consumers relating to such collection, use, or retention of personal data.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.G	Limitations	If a controller processes personal data pursuant to an exemption in this section, the controller bears the burden of demonstrating that such processing qualifies for the exemption and complies with the requirements in subsection F.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-582.H	Limitations	Processing personal data for the purposes expressly identified in subdivisions A 1 through 9 shall not solely make an entity a controller with respect to such processing.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-583	Investigative authority	Whenever the Attorney General has reasonable cause to believe that any person has engaged in, is engaging in, or is about to engage in any violation of this chapter, the Attorney General is empowered to issue a civil investigative demand. The provisions of § 59.1-9.10 shall apply mutatis mutandis to civil investigative demands issued under this section.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-580.A	Enforcement; civil penalty; expenses	The Attorney General shall have exclusive authority to enforce the provisions of this chapter.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.

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
59.1-580.B	Enforcement; civil penalty; expenses	Prior to initiating any action under this chapter, the Attorney General shall provide a controller or processor 30 days' written notice identifying the specific provisions of this chapter the Attorney General alleges have been or are being violated. If within the 30-day period the controller or processor cures the noticed violation and provides the Attorney General an express written statement that the alleged violations have been cured and that no further violations shall occur, no action shall be initiated against the controller or processor.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-580.C	Enforcement; civil penalty; expenses	If a controller or processor continues to violate this chapter following the cure period in subsection B or breaches an express written statement provided to the Attorney General under that subsection, the Attorney General may initiate an action in the name of the Commonwealth and may seek an injunction to restrain any violations of this chapter and civil penalties of up to $7,500 for each violation under this chapter. All civil penalties, expenses, and attorney fees collected pursuant to this chapter shall be paid into the state treasury and credited to the Regulatory, Consumer Advocacy, Litigation, and Enforcement Revolving Trust Fund.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-580.D	Enforcement; civil penalty; expenses	The Attorney General may recover reasonable expenses incurred in investigating and preparing the case, including attorney fees, in any action initiated under this chapter.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-580.E	Enforcement; civil penalty; expenses	Nothing in this chapter shall be construed as providing the basis for, or be subject to, a private right of action for violations of this chapter or under any other law.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.
59.1-585	Repealed	Repealed by Acts 2022, cc. 451 and 452, cl. 2.	Functional	No Relationship	N/A	N/A	N/A	N/A	No requirements to map to.