



Colorado Privacy Act (“CPA”) Compliance Snapshot

Understand the Law. Identify Your Obligations. Prepare for Compliance.

This CLIClaw Compliance Snapshot provides a concise overview of the Colorado Privacy Act (“CPA”), including its applicability, consumer privacy rights, key business obligations, third-party requirements, enforcement provisions, and compliance considerations.

Designed as a practical reference for businesses, the snapshot helps organizations understand the law's principal requirements, evaluate potential applicability, and identify areas that may require additional compliance planning or operational review.

Use this snapshot as a starting point for understanding Colorado's privacy requirements and determining whether further assessment, implementation, or legal guidance is needed.

DISCLAIMER

These materials are provided for informational and compliance support purposes only and are not intended as legal advice. Use of these materials does not establish an attorney-client relationship.

Organizations are responsible for evaluating applicable legal requirements and should consult qualified legal counsel regarding specific obligations.

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COLORADO PRIVACY ACT (CPA) 2026 COMPLIANCE SNAPSHOT

SB 21-190 | Effective July 1, 2023 | Updated October 2026



Colorado's Privacy Act establishes consumer privacy rights and obligations for covered controllers. Later amendments address biometric identifiers, minors' online data, and precise geolocation.

01

APPLICABILITY

Which Organizations May Be Covered?



Generally covers controllers conducting business in Colorado or targeting Colorado residents that process personal data of 100,000 or more Colorado consumers annually, or process data of 25,000 or more consumers and derive revenue or receive a discount from data sales.

Exemptions and special provisions apply.

02

CONSUMER RIGHTS

What Rights Do Colorado Consumers Have?



Access, correction, deletion, portability, and opt-outs for targeted advertising, sale of personal data, and qualifying profiling.

Controllers must honor qualifying universal opt-out mechanisms for sales and targeted advertising.

03

KEY BUSINESS OBLIGATIONS

What Must Covered Controllers Do?



Provide clear and accessible privacy notices; establish consumer request procedures; implement data minimization and reasonable security; obtain consent for processing sensitive data; use processor contracts; and conduct data protection assessments for high-risk processing.

04

BIOMETRIC AND GEOLOCATION

What Additional Requirements Apply?



Biometric amendments effective July 1, 2025 add written retention and deletion policies and collection safeguards for biometric identifiers.

Precise geolocation is protected as sensitive data under subsequent amendments.

05

MINORS' ONLINE PRIVACY

What Protections Apply to Minors?



From October 1, 2025, special protections apply to certain online services involving known minors, including heightened-risk assessments and restrictions on targeted advertising, profiling, sale of personal data, geolocation, and certain design features. These protections may apply regardless of general CPA thresholds.

06

ENFORCEMENT

How is the Law Enforced?



The Colorado Attorney General and district attorneys enforce the CPA.

No general private right of action.

Evaluate applicable notice-and-cure provisions rather than assuming a universal cure period.



Put Colorado's Privacy Requirements Into Practice.

Explore CLIClaw's Privacy Compliance Solutions for assessments, procedures, checklists, and documentation tools.

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