

June 24, 2025

The Honorable Charity R. Clark
Office of the Vermont Attorney General
109 State St
Montpelier, VT 05609
(802) 828-3171
AGO.CAP@vermont.gov

Re: Analysis Report of Data Broker Registration Gaps

Dear Attorney General Clark:

We are Privacy Rights Clearinghouse, a San Diego-based consumer privacy advocacy and education organization, and the Electronic Frontier Foundation, a San Francisco-based nonprofit organization defending civil liberties in the digital world, writing to bring to your attention an important matter of consumer privacy and regulatory compliance concerning California's data broker registration requirements.

Our comprehensive analysis has uncovered a troubling pattern, identifying 309 data brokers that apparently have either not registered or re-registered with the Vermont Secretary of State's registry despite having registered in other states.

The attached report identifies self-identified data brokers that are operating in other jurisdictions—as evidenced by their registration in states like California, Texas, and Oregon—or that have previously registered in Vermont, yet did not appear on Vermont's registry at the time of data collection. More investigation by the state is needed since data broker requirements vary from state to state. But these findings could indicate a systematic failure of compliance in Vermont, potentially undermining the transparency goals at the heart of the state's privacy framework.

We believe that a wider investigation and targeted enforcement actions against any non-compliant data brokers would send a powerful signal to the industry about Vermont's commitment to privacy enforcement.

Key Findings

Our analysis of state data broker registries has yielded the following key findings:

- Total unique data broker entities identified across all registries: 750
- Data brokers registered in Vermont: 441
- Data brokers registered in Texas: 226
- Data brokers registered in Oregon: 275
- Data brokers registered in California Attorney General registry (legacy): 493
- Data brokers registered in California CPPA registry (current): 459
- **Data brokers found in other registries but not in Vermont's registry: 309**

These findings highlight a significant gap in Vermont's data broker registration system. Many companies that acknowledge their data broker status in other states by registering are not registering in Vermont.

Methodology

Our analysis involved several key steps:

1. **Data Collection:** We scraped data broker registries from California (from the now depreciated though still available Office of the Attorney General for the years 2020-2023 and the current California registry for 2025 maintained by the California Privacy Protection Agency), Vermont (containing current and historical registrations going back to 2019), Texas (containing current 2025 registrations), and Oregon (containing current registration). We collected these registries from April 4th until the 8th, 2025.
2. **Data Normalization:** We standardized the data fields across all registries to ensure consistency.
3. **Broker Identification & Matching:** We used a matching algorithm to identify the same brokers across different registries. Our algorithm was based on comparing the business names as well as the email and web domains. After getting a final list, we manually checked each name on the list below.

Vermont's definition of a data broker is similar to definitions used in other states. Our analysis is based on a straightforward premise: data brokers that self-identify as such by registering in other states—or those who registered in any state in previous years—may have obligations to register in Vermont if they meet the statutory definition of a data broker under Vermont law.

Each company on our list meets two simple criteria:

1. It has self-identified as a data broker by currently or previously registering in at least one state, including previously registration in Vermont.
2. It did not appear on the Vermont registry at the time of data collection.

VT Enforcement Information

Vt. Stat. Ann. tit. 9, § 2430 et seq. requires data brokers to register with the state and pay a filing fee. Enforcement authority currently resides with the AG:

- The AG may bring administrative actions against data brokers for failing to register (§ 2446(c)).
- Civil penalties are significant: \$50 for each day the data broker fails to register, not to exceed \$10,000 for each year it fails to register (§ 2446(b)(1)).

Beyond the financial impact, enforcement actions would significantly enhance transparency in the data broker ecosystem and strengthen Vermont's privacy framework.

VT Law Relative to Other States

Four states have separate data broker registration laws. While their registration requirements are similar, in some cases, a data broker may be subject to registration in one state while not being required to register in another. Or a company that at one time met the definition of a data broker could later change its business, removing its registration obligations.

When comparing state registries, small differences in the laws could lead companies registering in one state to have legitimate reasons for not registering in another. For example:

- California, Texas, and Oregon exclude entities covered by the Fair Credit Reporting Act (FCRA), while Vermont does not.
- California, Texas and Oregon exclude entities covered by the Gramm-Leach-Bliley Act (GLBA), while Vermont does not.
- California and Vermont exclude some insurers, while Texas and Oregon do not.
- California excludes entities that satisfy three thresholds: gross revenue is less than \$25m annually, headcount is less than 100,000 California consumers annually, and revenue fraction from selling California consumers' data is less than 50%. Texas shares the same revenue fraction threshold but has a lower headcount threshold (50,000 Texas consumers). Oregon and Vermont do not have any minimum thresholds.
- California and Vermont, require businesses to "knowingly" collect and sell data, while Texas and Oregon do not. Moreover, the definition of data broker in Texas does not explicitly require the "sale" of data.
- Texas excludes certain nonprofits that assist missing and exploited children, while California, Oregon, and Vermont do not.
- Texas periodically removes expired registrations, which may cause discrepancies between the data presented here (collected April 4–8, 2025) and the state's current registry. Vermont explicitly marks expired registrations, while California and Oregon retain all registrations publicly.

Conclusion

The findings in this report highlight a significant number of data brokers who are not registering in Vermont, despite registering in other states. While the transparency objectives of Vermont's Data Broker Regulation Legislation represent important advances for consumer privacy, their effectiveness ultimately depends on rigorous enforcement.

Your office has consistently demonstrated leadership in privacy protection through strategic enforcement actions that strengthen compliance across entire industries. The data broker ecosystem particularly benefits from such an approach, as it remains opaque to most consumers despite handling vast quantities of sensitive personal information.

Our organizations stand ready to provide any additional information, technical assistance, or follow-up research that might assist in pursuing any investigation. We would welcome the chance to discuss our findings in greater detail.

Thank you for your consideration of this important privacy enforcement issue.

Respectfully submitted,

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Privacy Rights Clearinghouse

Mario Trujillo
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Appendix A: Data Brokers Not Found in Vermont Registry

We have identified 309 data brokers that have registered in other states but did not appear on the Vermont registry at the time of data collection. These companies are listed below, along with the states where they have acknowledged their data broker status.

Superscript markers: * = collects geolocation data; ‡ = collects minors' data.

No.	Data Broker	Present in Registries (aliases/DBAs)
1	4C Insights ^{*‡}	California CPPA (as 4C Insights Inc.); California AG (legacy) (as 4C Insights)
2	6SENSE INSIGHTS Inc ^{*‡}	California CPPA (as 6Sense Insights, Inc.); California AG (legacy) (as 6Sense Insights, Inc.); Texas (as 6Sense Insights, Inc.); Oregon (as 6SENSE INSIGHTS Inc)
3	Above Data, Inc.	California CPPA (as Above Data; Above Data, Inc.)
4	ACE Agents Inc. ^{*‡}	California AG (legacy) (as ACE Agents Inc.)
5	Acuant, Inc. ^{*‡}	California AG (legacy) (as Acuant, Inc.; Idology, Inc.)
6	ACXIOM LLC ^{*‡}	California CPPA (as Acxiom LLC); California AG (legacy) (as Acxiom LLC); Texas (as Acxiom LLC); Oregon (as ACXIOM LLC)
7	Ad Direct Inc ^{*‡}	California AG (legacy) (as Ad Direct Inc)
8	Adsquare GmbH ^{*‡}	California CPPA (as Adsquare GmbH); California AG (legacy) (as Adsquare GmbH); Texas (as Adsquare GmbH)
9	Advisortarget, LLC	California CPPA (as Advisortarget, LLC; Finsum)
10	AFFINITY ANSWERS CORPORATION ^{*‡}	California CPPA (as Affinity Answers Corporation); California AG (legacy) (as Affinity Answers Corporation); Oregon (as AFFINITY ANSWERS CORPORATION)
11	Affinity Solutions ^{*‡}	California CPPA (as Affinity Solutions); California AG (legacy) (as Affinity Solutions); Texas (as Affinity Solutions Inc.)
12	AGR MARKETING Solutions, LLC	California CPPA (as AGR Marketing Solutions LLC); California AG (legacy) (as AGR MARKETING Solutions, LLC)
13	Alikeaudience, Inc. ^{*‡}	California CPPA (as Alikeaudience, Inc.)
14	Alphonso Inc. ^{*‡}	California CPPA (as Alphonso Inc.); California AG (legacy) (as Alphonso Inc.)
15	American City Business Journals, Inc.	California CPPA (as American City Business Journals, Inc.); California AG (legacy) (as American City Business Journals, Inc.)
16	Anexinet Corp.	California AG (legacy) (as Anexinet Corp.)

17	Appscience*‡	California CPPA (as Appscience); California AG (legacy) (as Appscience)
18	ARISTOTLE INTERNATIONAL Inc*‡	California CPPA (as Aristotle International, Inc.); California AG (legacy) (as Aristotle International Inc.); Oregon (as ARISTOTLE INTERNATIONAL Inc)
19	Arity 875, LLC*‡	California AG (legacy) (as Arity 875, LLC)
20	Arrakis Technologies Corp.*‡	California AG (legacy) (as Arrakis Technologies Corp.)
21	AMERICAN SPIRIT DATA SOLUTIONS LLC*‡	California AG (legacy) (as Aspire North); Oregon (as AMERICAN SPIRIT DATA SOLUTIONS LLC; American Spirit Data Solutions LLC; Aspire North)
22	Astoria Company Marketing LLC	California CPPA (as Astoria Company Marketing LLC)
23	Audiencerate Ltd*‡	California AG (legacy) (as Audiencerate Ltd)
24	Automotive Mastermind*‡	California AG (legacy) (as Automotive Mastermind)
25	Azerion US Inc.*	California CPPA (as Azerion US Inc.); Texas (as Azerion US Inc.)
26	BDO Gci, LLC*‡	California CPPA (as BDO Gci, LLC; BDO Usa, P.C.; Global Corporate Intelligence Group); California AG (legacy) (as BDO USA, LLP; Investigative Due Diligence Group)
27	Beeswax*	California CPPA (as Beeswax)
28	Biointelli Corporation	California CPPA (as Biointelli Corporation)
29	Bliss Point Media, Inc.*‡	California AG (legacy) (as Bliss Point Media, Inc.)
30	Blue Action*‡	California AG (legacy) (as Blue Action)
31	Bombora, Inc	California CPPA (as Bombora, Inc)
32	A DIRECT MARKETING Inc*‡	California CPPA (as A Direct Marketing Inc; Bookyourdata); California AG (legacy) (as Book Your Data); Oregon (as A DIRECT MARKETING Inc; Bookyourdata)
33	Business Resource Center LLC*	Texas (as Business Resource Center LLC)
34	Brightcheck Inc.	California CPPA (as Brightcheck Inc.)
35	Brooks Integrated Marketing, LLC*‡	California CPPA (as Brooks Integrated Marketing, LLC); California AG (legacy) (as Brooks Integrated Marketing, LLC)
36	BTRS Holdings Inc*‡	California AG (legacy) (as BTRS Holdings Inc; Billtrust; Factor Systems, LLC)
37	Buxton Company, LLC*	California CPPA (as Buxton Company, LLC); California AG (legacy) (as Buxton Company, LLC); Texas (as Buxton Company, LLC)
38	BV Insights LLC*	California CPPA (as BV Insights LLC; Big Village)
39	Car Market Solutions LLC	California CPPA (as Car Market Solutions LLC)
40	CARRY TECHNOLOGIES Inc*‡	California CPPA (as Carry Technologies Inc.; Hightouch); Texas (as Carry Technologies, Inc); Oregon (as CARRY TECHNOLOGIES Inc; Hightouch)

41	CATALINA MARKETING CORPORATION*‡	California CPPA (as Catalina; Catalina Marketing Corporation); California AG (legacy) (as Catalina); Texas (as Catalina Marketing Corporation); Oregon (as CATALINA MARKETING CORPORATION; Catalina Marketing)
42	Charles Bennett	Texas (as Charles Bennett)
43	Checkpeople, LLC	California CPPA (as Checkpeople, LLC)
44	CITYDATA Inc.*	California CPPA (as CITYDATA Inc.); California AG (legacy) (as Citydata, Inc.)
45	Civil Data Research, LLC	California CPPA (as Civil Data Research, LLC; Search Public Records)
46	CO2 Ventures, LLC*‡	California CPPA (as CO2 Ventures, LLC); California AG (legacy) (as CO2 Ventures, LLC; Oncore Leads); Oregon (as CO2 Ventures, LLC)
47	Compile, Inc.*‡	California AG (legacy) (as Compile, Inc.)
48	Complementics*‡	California AG (legacy) (as Complementics)
49	COMPLETE MAILING LISTS LLC*‡	California CPPA (as Complete Mailing Lists LLC); California AG (legacy) (as Complete Mailing Lists); Texas (as Complete Mailing Lists LLC); Oregon (as COMPLETE MAILING LISTS LLC)
50	Comscore, Inc.*‡	California CPPA (as Comscore, Inc.); California AG (legacy) (as Comscore, Inc.)
51	Connect Computer LLC*‡	California AG (legacy) (as Connect Computer LLC)
52	Connected Investors*‡	California CPPA (as Connected Investors, LLC); California AG (legacy) (as Connected Investors); Oregon (as Connected Investors LLC)
53	Consider, Inc.*‡	California AG (legacy) (as Consider, Inc.)
54	CONSUMER CANVAS LLC*‡	Texas (as Consumer Canvas, LLC); Oregon (as CONSUMER CANVAS; CONSUMER CANVAS LLC)
55	Contactout*‡	California AG (legacy) (as Contactout)
56	Contentgine Inc.	California AG (legacy) (as Contentgine Inc.)
57	CONVEX LABS LLC*‡	California CPPA (as Convex Labs, Inc.); California AG (legacy) (as Convex Labs, Inc.); Oregon (as CONVEX LABS LLC; Convex Labs)
58	Costar Group*‡	California CPPA (as Costar Group); California AG (legacy) (as Costar Realty Information, Inc.)
59	Cross Pixel Media, Inc.	California CPPA (as Cross Pixel Media, Inc.); California AG (legacy) (as Cross Pixel Media, Inc.); Texas (as Cross Pixel Media, Inc.)
60	Customer Communications Group, Inc.*‡	California AG (legacy) (as Customer Communications Group, Inc.)
61	Cyndx Networks LLC	California AG (legacy) (as Cyndx Networks LLC)
62	Datadirect Marketing Solutions, Inc.	California AG (legacy) (as Datadirect Marketing Solutions, Inc.)

63	Datadojo CDP Inc.*	Texas (as Datadojo CDP Inc.)
64	Datafy LLC*	California CPPA (as Datafy LLC)
65	Data Marketing Solutions, Inc.*‡	California AG (legacy) (as Data Marketing Solutions, Inc.)
66	Dataskip	California CPPA (as Dataskip)
67	DATONICS LLC*‡	California CPPA (as DATONICS LLC); California AG (legacy) (as Datonics, LLC); Texas (as Datonics LLC); Oregon (as DATONICS LLC)
68	David Rickenbacher	California AG (legacy) (as David Rickenbacher)
69	Dealersocket, LLC	California CPPA (as Dealersocket, LLC)
70	DECIDE TECHNOLOGIES Inc*‡	California CPPA (as Decide; Decide Technologies, Inc.); California AG (legacy) (as Decide Technologies Inc.); Texas (as Decide Technologies Inc.); Oregon (as DECIDE TECHNOLOGIES Inc; Decide)
71	DECISIONLINKS LLC*‡	California CPPA (as Decisionlinks); California AG (legacy) (as Decisionlinks); Oregon (as DECISIONLINKS LLC)
72	Deeprtrace Inc.*‡	California AG (legacy) (as Deeprtrace Inc.)
73	Delivr.Ai Inc	California CPPA (as Delivr.Ai Inc)
74	Demand Science Group, LLC*‡	California CPPA (as Demand Science US, LLC); California AG (legacy) (as Demand Science Group, LLC)
75	DICE CAREER SOLUTIONS Inc*‡	California CPPA (as Dice Career Solutions, Inc.); California AG (legacy) (as Dice Career Solutions, Inc.); Oregon (as DICE; DICE CAREER SOLUTIONS Inc)
76	Digital Safety Products, LLC	California CPPA (as Digital Safety Products, LLC; Public Record Reports; Spyfly)
77	DIGITAL VIKING MEDIA Inc*‡	California CPPA (as Digital Viking Media Inc); California AG (legacy) (as Digital Viking Media Inc.); Texas (as Digital Viking Media); Oregon (as DIGITAL VIKING MEDIA Inc; Digital Viking Media Inc)
78	Diligent Corporation	California AG (legacy) (as Diligent Corporation)
79	Disco Technology Inc.*‡	California CPPA (as Disco; Disco Technology Inc.); California AG (legacy) (as Disco Technology Inc.)
80	Distribution Processing Center LLC	California AG (legacy) (as Distribution Processing Center LLC)
81	Dmdatabases	California AG (legacy) (as Dmdatabases)
82	Dspolitical, LLC	California CPPA (as Dspolitical, LLC; Optimal)
83	Dstillery Inc.*‡	California CPPA (as Dstillery; Dstillery, Inc); California AG (legacy) (as Dstillery Inc.)
84	DTN LLC*‡	California CPPA (as Dtn, LLC); California AG (legacy) (as Dtn, LLC); Oregon (as DTN LLC)

85	Email Marketing Services, Inc.*‡	California AG (legacy) (as Email Marketing Services, Inc)
86	Emailmovers Ltd*‡	California AG (legacy) (as Emailmovers Ltd)
87	Endgame Labs, Inc	California CPPA (as Endgame; Endgame Labs, Inc)
88	Eprodirect*‡	California CPPA (as Eprodirect LLC); California AG (legacy) (as Eprodirect)
89	E.Republic LLC*‡	California CPPA (as E.Republic, LLC); California AG (legacy) (as E.Republic LLC); Oregon (as E.Republic LLC; EREPUBLIC LLC; Erepublic LLC)
90	Evorra Ltd	California CPPA (as Evorra Ltd)
91	Exponential Interactive, Inc.*‡	California AG (legacy) (as Exponential Interactive, Inc.; Vdx.Tv)
92	Eyeota Pte Ltd*‡	California CPPA (as Eyeota Pte Ltd); California AG (legacy) (as Eyeota Pte Ltd)
93	Factori Technologies LLC	California AG (legacy) (as Factori Technologies LLC)
94	Famous Birthdays LLC‡	California CPPA (as Famous Birthdays LLC); California AG (legacy) (as Famous Birthdays, LLC)
95	FARADAY Inc*‡	California CPPA (as Faraday, Inc.); California AG (legacy) (as Faraday, Inc.); Texas (as Faraday, Inc.); Oregon (as FARADAY Inc)
96	Fifty Technology Limited*‡	California CPPA (as Fifty Technology Limited); California AG (legacy) (as Fifty Technology Ltd)
97	FIRST MOVERS ADVANTAGE LLC*‡	California AG (legacy) (as First Movers Advantage, LLC); Oregon (as FIRST MOVERS ADVANTAGE LLC)
98	Flashintel*‡	California CPPA (as Flashintel); California AG (legacy) (as Stefan Certic)
99	Freepeoplesearch.Com, LLC	California CPPA (as Freepeoplesearch.Com, LLC)
100	Freewheel Media Inc*	California CPPA (as Freewheel Media Inc)
101	Fushia Media LLC*‡	California CPPA (as Fushia Media, LLC.); California AG (legacy) (as Fushia Media LLC)
102	Glad I Know, Inc.*‡	California AG (legacy) (as Glad I Know, Inc.)
103	Good Boy Studios, Inc	California AG (legacy) (as Good Boy Studios, Inc)
104	GRASSROOTS ANALYTICS Inc*‡	California CPPA (as Grassroots Analytics); California AG (legacy) (as Grassroots Analytics); Oregon (as GRASSROOTS ANALYTICS Inc)
105	Grata Inc	California AG (legacy) (as Grata Inc)
106	GREAT LAKES LIST Inc*‡	California CPPA (as Great Lakes List Management; Great Lakes List, Inc.); California AG (legacy) (as Great Lakes List Management); Oregon (as GREAT LAKES LIST Inc)
107	Greenhouse Software, Inc.*‡	California AG (legacy) (as Greenhouse Software, Inc.)

108	GRIN TECHNOLOGIES Inc.*‡	California CPPA (as GRIN Technologies Inc.); Texas (as Grin Technologies Inc.); Oregon (as GRIN TECHNOLOGIES Inc)
109	H1 Insights Inc.*‡	California AG (legacy) (as H1 Insights Inc.)
110	Hamza Online Services, LLC*	Texas (as Hamza Online Services, LLC)
111	Harmon Research Group, LLC*‡	California AG (legacy) (as Harmon Research Group, LLC)
112	Health Is Wealth Marketing LLC	California AG (legacy) (as Health Is Wealth Marketing LLC; Pickmedicare)
113	Helix Campaigns LLC	California CPPA (as Helix Campaigns LLC)
114	HERE North America LLC	California AG (legacy) (as HERE North America LLC)
115	Hexasoft Development Sdn. Bhd.*‡	California AG (legacy) (as Hexasoft Development Sdn. Bhd.)
116	Hivestack Inc.*‡	California CPPA (as Hivestack Inc.); California AG (legacy) (as Hivestack, Inc.)
117	Hubspot, Inc.	California CPPA (as Hubspot, Inc.)
118	Hunt Club Inc	California CPPA (as Atlas; Hunt Club Inc)
119	Hunter Web Services Inc*‡	California CPPA (as Hunter Web Services, Inc.; Hunter.io); California AG (legacy) (as Hunter Web Services Inc)
120	Hybrid Theory*‡	California AG (legacy) (as Hybrid Theory)
121	I360 LLC*‡	California CPPA (as I360, LLC); California AG (legacy) (as I360, LLC); Texas (as I360, LLC); Oregon (as I360 LLC; I360, LLC)
122	ID5 Technology*‡	California CPPA (as ID5; ID5 Technology Ltd); California AG (legacy) (as ID5 Technology)
123	Idm, Inc.*‡	California CPPA (as Idm, LLC; Integrated Direct Marketing, LLC); California AG (legacy) (as Idm, Inc.)
124	Ileads.Com, LLC	California CPPA (as Ileads.Com, LLC; Tovodata)
125	Illumin Inc.*‡	California AG (legacy) (as Illumin Inc.)
126	Imprint Analytics LLC*‡	California AG (legacy) (as Imprint Analytics LLC)
127	Inbound Insight, LLC*‡	California CPPA (as Inbound Insight, LLC); California AG (legacy) (as Inbound Insight, LLC); Texas (as Inbound Insight, LLC)
128	INBOX CREDIT INNOVATIONS LLC*‡	Oregon (as INBOX CREDIT INNOVATIONS LLC; Monitorbase)
129	Indiemark LLC*‡	California CPPA (as Email Industries; Indiemark LLC); California AG (legacy) (as Indiemark LLC)
130	Infinite Knot Inc.	California CPPA (as Contacts411; Infinite Knot Inc.)
131	Infinite Media Concepts Inc*‡	California CPPA (as Infinite Media Concepts Inc; Mailinglists.Com); California AG (legacy) (as Infinite Media Concepts Inc); Texas (as Infinite Media Concepts Inc)

132	INFOPAY Inc*‡	California CPPA (as Infopay, Inc); California AG (legacy) (as Infopay, Inc); Texas (as Infopay, Inc); Oregon (as INFOPAY Inc)
133	Information.Com, LLC	California CPPA (as Information.Com, LLC)
134	Information Data Resources, LLC	California CPPA (as Information Data Resources, LLC; Public Information Services)
135	Inmarket Media LLC*‡	California CPPA (as Inmarket Media, LLC); California AG (legacy) (as Inmarket Media LLC)
136	Inmobi	California AG (legacy) (as Inmobi)
137	Innovative Database Solutions, Inc.*	California CPPA (as Innovative Database Solutions, Inc.); Texas (as Innovative Database Solutions, Inc.)
138	Insightbridge LLC	California CPPA (as Insightbridge LLC; Mylife.Com)
139	Integrated Medical Data, LLC.*‡	California AG (legacy) (as Integrated Medical Data, LLC.)
140	Intentgine Inc.	California AG (legacy) (as Intentgine Inc.)
141	INTENT IQ LLC*‡	California CPPA (as Intent IQ LLC); California AG (legacy) (as Intent IQ LLC); Texas (as Intent IQ LLC); Oregon (as INTENT IQ LLC; Intent IQ LLC)
142	Intentmacro Inc.	California AG (legacy) (as Intentmacro Inc.)
143	INTENTSIFY LLC*‡	California CPPA (as Intentsify, LLC); Texas (as Intentsify, LLC); Oregon (as INTENTSIFY LLC; Intentsify, LLC)
144	Ipsos*‡	California AG (legacy) (as Ipsos)
145	Ispot.Tv*‡	California CPPA (as Ispot.Tv, Inc.); California AG (legacy) (as Ispot.Tv)
146	JDM LIST SERVICES LLC*‡	California CPPA (as JDM LIST Services, LLC); California AG (legacy) (as JDM List Services, LLC); Texas (as JDM LIST Services, LLC); Oregon (as JDM LIST SERVICES LLC)
147	Jun Group Productions, LLC*‡	California CPPA (as Jun Group Productions, LLC); California AG (legacy) (as Jun Group Productions, LLC)
148	Kargo Global LLC	California CPPA (as Kargo Global LLC)
149	KB Synergy Inc*‡	California CPPA (as KB Synergy Inc); California AG (legacy) (as KB Synergy Inc)
150	KEY MARKETING ADVANTAGE LLC*‡	California CPPA (as Key Marketing Advantage, LLC); California AG (legacy) (as Key Marketing Advantage, LLC); Oregon (as KEY MARKETING ADVANTAGE LLC; Key Marketing Advantage, LLC)
151	Knower Tech Usa, LLC*	California CPPA (as Knower Tech; Knower Tech Usa, LLC)
152	Koddi Inc.	California CPPA (as Koddi Inc.)
153	Kols (Key Opinion Leaders)*‡	California AG (legacy) (as Kols (Key Opinion Leaders))

154	KOMODO HEALTH Inc*‡	California CPPA (as Komodo Health, Inc.); California AG (legacy) (as Komodo Health, Inc.); Oregon (as KOMODO HEALTH Inc)
155	Kyber Health Data LLC*	California AG (legacy) (as Kyber Health Data LLC)
156	Leadcrunch*‡	California CPPA (as Getrev; Leadcrunch); California AG (legacy) (as Leadcrunch; Rev)
157	Leadership Connect*‡	California AG (legacy) (as Leadership Connect)
158	Leadloft Inc.*‡	California AG (legacy) (as Leadloft Inc.)
159	LEAD ME MEDIA LLC*‡	California CPPA (as Lead Me Media, LLC); California AG (legacy) (as Lead Me Media); Texas (as Lead Me Media, LLC); Oregon (as LEAD ME MEDIA LLC)
160	Leadsmarket.Com LLC*‡	California CPPA (as Leadsmarket.Com LLC); California AG (legacy) (as Leadsmarket.Com LLC)
161	Lifesight LLC*‡	California AG (legacy) (as Lifesight LLC)
162	Lighthouse List*‡	California AG (legacy) (as Lighthouse List)
163	Limeleads	California AG (legacy) (as Limeleads)
164	LIONSHARE MARKETING Inc*‡	California CPPA (as Lionshare Marketing, Inc); California AG (legacy) (as Lionshare Marketing, Inc.); Oregon (as LIONSHARE MARKETING Inc)
165	Listings, Information, Systems And Tabulation Services, Inc*‡	California AG (legacy) (as Listings, Information, Systems And Tabulation Services, Inc)
166	Live Data Technologies Inc.	California CPPA (as Live Data Technologies, Inc.); California AG (legacy) (as Live Data Technologies Inc.)
167	LIZDEV Inc.*‡	California CPPA (as LIZDEV Inc.; Lizdev Inc.); California AG (legacy) (as Lizdev, Inc)
168	Locatesmarter LLC*‡	California CPPA (as Locatesmarter LLC); California AG (legacy) (as Locatesmarter, LLC)
169	LOOPME LTD*‡	California CPPA (as Loopme Limited); California AG (legacy) (as Loopme Inc); Texas (as Loopme Ltd); Oregon (as LOOPME LTD)
170	Lotadata, Inc.*‡	California AG (legacy) (as Lotadata, Inc.)
171	L.S Mobile Apps Holdings Ltd	California CPPA (as L.S Mobile Apps Holdings Ltd)
172	Madhive, Inc.	California CPPA (as Madhive, Inc.); California AG (legacy) (as Madhive, Inc.)
173	Madison Logic, Inc.	California AG (legacy) (as Madison Logic, Inc.)
174	MAGNITE Inc*‡	California CPPA (as Magnite Inc); California AG (legacy) (as Magnite Inc); Texas (as Magnite Inc); Oregon (as MAGNITE Inc; Magnite)

175	Malvern Media Inc.*‡	California CPPA (as Malvern Media Inc.); California AG (legacy) (as Malvern Media Inc.)
176	Marinus Analytics	California AG (legacy) (as Marinus Analytics)
177	Market Force Corporation*‡	California CPPA (as Market Force Corporation); California AG (legacy) (as Market Force Corporation)
178	Marriott International, Inc.*‡	California CPPA (as Marriott International, Inc.)
179	Matchandappend.Com LLC*‡	California AG (legacy) (as Matchandappend.Com LLC)
180	MATCHBOOK DATA LLC*‡	California CPPA (as Matchbook Data, LLC); Texas (as Matchbook Data, LLC); Oregon (as MATCHBOOK DATA LLC)
181	Mediamath, Inc.*‡	California AG (legacy) (as Mediamath, Inc.)
182	Media.Net Advertising Fz, LLC	California CPPA (as Media.Net Advertising Fz, LLC)
183	Mediasoft, LLC*‡	California AG (legacy) (as Mediasoft, LLC)
184	Media Source Solutions	California AG (legacy) (as Media Source Solutions)
185	Mediazod LLC*‡	California AG (legacy) (as Leadzod.Com; Mediazod LLC)
186	Medpro Systems	California CPPA (as Medpro Systems)
187	MH Sub I, LLC*‡	California CPPA (as MH Sub I, LLC); California AG (legacy) (as MH Sub I, LLC)
188	Mightyrep*‡	California AG (legacy) (as Mightyrep)
189	MILESTONE MARKETING SOLUTIONS*‡	California AG (legacy) (as Milestone Marketing Solutions); Oregon (as MILESTONE MARKETING SOLUTIONS)
190	Mobile Technology Corporation*	California CPPA (as Mobile Technology Corporation; Onspot Data); California AG (legacy) (as Mobile Technology Corporation)
191	Modigie Inc.*‡	California AG (legacy) (as Modigie Inc.)
192	M & R STRATEGIC SERVICES Inc*‡	California CPPA (as M&R Strategic Services; M+R); California AG (legacy) (as M&R Strategic Services); Oregon (as M & R STRATEGIC SERVICES Inc; M & R Strategic Services Inc)
193	MULTIMEDIA LISTS Inc*‡	California CPPA (as MULTIMEDIA Lists, Inc.); California AG (legacy) (as MULTIMEDIA Lists, Inc.); Oregon (as MULTIMEDIA LISTS Inc)
194	MY RENTER CHECKER LLC*‡	California AG (legacy) (as MY RENTER CHECKER LLC)
195	National Data Analytics, LLC	California CPPA (as National Data Analytics, LLC; Public Data Check)
196	National Opinion Institute, LLC	California CPPA (as National Opinion Institute, LLC)
197	NC VENTURES LLC*‡	California CPPA (as NC Vnetures, LLC; NCS); California AG (legacy) (as NC Ventures, LLC; NCS); Oregon (as NC VENTURES LLC; NCS; Ncs; Ncsolutions)

198	New Gold Ventures LLC	California CPPA (as New Gold Ventures LLC; Think Data Group)
199	Nexsales Solutions Inc.	California AG (legacy) (as Nexsales Solutions Inc.)
200	Next Wave Marketing Strategies, Inc.*	California CPPA (as Agedleadstore.Com; Next Wave Marketing Strategies, Inc); California AG (legacy) (as Next Wave Marketing Strategies, Inc); Texas (as Next Wave Marketing Strategies, Inc)
201	North American Media LLC	California CPPA (as North American Media LLC)
202	One Model, Inc.*‡	California AG (legacy) (as One Model, Inc.)
203	On Hold-America, Inc.‡	California AG (legacy) (as KYC Data; On Hold-America, Inc.)
204	Online Advertising Network Sp. z o.o.*‡	California CPPA (as Online Advertising Network Sp. z o.o.); California AG (legacy) (as Online Advertising Network Sp. z o.o.)
205	ONLINE MEDIA GROUP Inc.	California CPPA (as ONLINE MEDIA GROUP Inc.)
206	Opensend Inc	California CPPA (as Opensend; Opensend Inc)
207	Openx Technologies, Inc.*‡	California CPPA (as Openx Technologies, Inc.); California AG (legacy) (as Openx Technologies, Inc.)
208	Optimal Fusion*‡	California AG (legacy) (as Optimal Fusion)
209	Outbrain Inc.	California CPPA (as Outbrain Inc.); California AG (legacy) (as Outbrain Inc.)
210	OUTLOGIC LLC*‡	California CPPA (as Outlogic, LLC); California AG (legacy) (as Outlogic, LLC); Texas (as Outlogic, LLC); Oregon (as OUTLOGIC LLC)
211	Paedae, Inc.*	California CPPA (as Infillion; Paedae, Inc.); Texas (as Infillion; Paedae, Inc.)
212	PARAMOUNT LISTS Inc*‡	California CPPA (as Paramount Direct Marketing; Paramount Lists, Inc.); California AG (legacy) (as Paramount Lists, Inc.); Oregon (as PARAMOUNT LISTS Inc; Paramount Lists, Inc.)
213	PATHWAY VENTURES LLC*‡	California AG (legacy) (as Pathway Ventures, LLC); Oregon (as PATHWAY VENTURES LLC)
214	PEEKYOU LLC*‡	California AG (legacy) (as Peekyou LLC); Oregon (as PEEKYOU LLC; Peekyou LLC)
215	Pension Benefit Information, LLC*‡	California AG (legacy) (as Pension Benefit Information, LLC)
216	Peoplefindersdaas*‡	California CPPA (as Peoplefindersdaas); California AG (legacy) (as Peoplefindersdaas)
217	Peoplewhiz	California CPPA (as Peoplewhiz)
218	Perf Labs, Inc.	California AG (legacy) (as Interseller; Perf Labs, Inc.)
219	Permutive, Inc*‡	California AG (legacy) (as Permutive, Inc)

220	Pitchbook Data, Inc.*‡	California CPPA (as Pitchbook Data, Inc); California AG (legacy) (as Pitchbook Data, Inc.)
221	Place Exchange, Inc.*	California CPPA (as Place Exchange, Inc.)
222	Plexuss, Inc.*‡	California AG (legacy) (as Plexuss, Inc.)
223	PMG Worldwide, LLC	California CPPA (as PMG Worldwide, LLC)
224	Pop Acta Media LLC	California CPPA (as Pop Acta Media, LLC); California AG (legacy) (as Pop Acta Media LLC)
225	POSTIE Inc*‡	California CPPA (as Postie, Inc); California AG (legacy) (as Postie); Texas (as Postie, Inc); Oregon (as POSTIE Inc)
226	POSTPILOT Inc*‡	California CPPA (as Postpilot, Inc.); Texas (as Postpilot, Inc.); Oregon (as POSTPILOT Inc)
227	Predactiv	California CPPA (as Predactiv; Sharethis, A Division Of Predactiv)
228	Prodpro Inc	California CPPA (as Prodpro; Prodpro Inc)
229	PUBMATIC Inc*‡	California CPPA (as Pubmatic, Inc.); California AG (legacy) (as Pubmatic, Inc.); Texas (as Pubmatic, Inc.); Oregon (as PUBMATIC Inc)
230	Pulsepoint, Inc.*‡	California CPPA (as Pulsepoint Media; Pulsepoint, Inc.); California AG (legacy) (as Pulsepoint, Inc.)
231	Purecars Technologies, LLC	California CPPA (as Purecars; Purecars Technologies, LLC; The Autominer; Trupayments)
232	Quadrant Global Pte. Ltd.*	California CPPA (as Quadrant Global Pte. Ltd.)
233	Qualfon	California CPPA (as Qualfon); California AG (legacy) (as Qualfon)
234	Rategain Adara, Inc.	California CPPA (as Rategain Adara, Inc.)
235	Reach Marketing LLC	California AG (legacy) (as Reach Marketing LLC)
236	Reality Media, Inc.	California AG (legacy) (as Reality Media, Inc.)
237	Reallygreatrate, Inc.	California AG (legacy) (as RGR Marketing; Reallygreatrate, Inc.)
238	Realsource Inc.*‡	California CPPA (as Realsource, Inc); California AG (legacy) (as Realsource Inc.); Texas (as Realsource, Inc)
239	Redbird Direct LLC*‡	California AG (legacy) (as Redbird Direct LLC)
240	Bureau Van Dijk Electronic Publishing Ltd.*‡	California AG (legacy) (as Bureau Van Dijk Electronic Publishing Ltd.; Regulatory Datacorp, Inc.)
241	Reis Inc.*‡	California AG (legacy) (as Reis Inc.)
242	ResearchUSA*‡	California AG (legacy) (as ResearchUSA); Texas (as Researchusa LLC)

243	Results Only Consulting And Advertising*‡	California AG (legacy) (as Results Only Consulting And Advertising)
244	Revcontent	California CPPA (as Revcontent)
245	Rhetorik Limited*‡	California AG (legacy) (as Rhetorik Limited)
246	ROOFTOP DIGITAL LLC*‡	California CPPA (as Rooftop Digital, LLC); California AG (legacy) (as Rooftop Digital); Texas (as Rooftop Digital, LLC); Oregon (as ROOFTOP DIGITAL LLC)
247	Round Sky, Inc.	California CPPA (as Round Sky, Inc.); California AG (legacy) (as Round Sky, Inc.)
248	Sabio, Inc.*‡	California CPPA (as Sabio, Inc.); California AG (legacy) (as Sabio, Inc.)
249	Safegraph Inc.*‡	California AG (legacy) (as Safegraph Inc.)
250	Saleseer, Inc.*	Texas (as Saleseer, Inc.)
251	Sawyer Lists, LLC	California AG (legacy) (as Sawyer Lists, LLC)
252	Sbfe, LLC*‡	California CPPA (as Sbfe, LLC); California AG (legacy) (as Sbfe, LLC)
253	Scalable Commerce, LLC	California CPPA (as Kids Live Safe; Quick Public Records; Scalable Commerce, LLC)
254	Scraping Robot, LLC	California AG (legacy) (as Scraping Robot, LLC)
255	Scryer, Inc.	California AG (legacy) (as Reonomy; Scryer, Inc.)
256	SEARCHBUG Inc*‡	California AG (legacy) (as Searchbug); Texas (as Searchbug, Inc.); Oregon (as SEARCHBUG Inc; Searchbug.Com)
257	Sentilink Corp*‡	California AG (legacy) (as Sentilink Corp)
258	SG360	California AG (legacy) (as SG360)
259	Sharethrough Inc.*‡	California CPPA (as Sharethrough Inc.); California AG (legacy) (as Sharethrough Inc.)
260	Similarweb Ltd.*	California CPPA (as Similarweb Ltd.); Texas (as Similarweb Ltd.)
261	Marketing Partner Services, LLC	California CPPA (as Marketing Partner Services, LLC; Site Impact, Inc); California AG (legacy) (as Site Impact)
262	Slashdot Media, LLC*‡	California CPPA (as Slashdot Media; Slashdot Media, LLC); California AG (legacy) (as Slashdot Media, LLC)
263	Sourceit Technologies, Inc*‡	California AG (legacy) (as Sourceit Technologies, Inc)
264	Source Path Digital	California CPPA (as Source Path Digital)
265	Sovrn, Inc.	California CPPA (as Sovrn, Inc.); California AG (legacy) (as Sovrn, Inc.)
266	Spectrum Mailing Lists	California AG (legacy) (as Spectrum Mailing Lists)
267	R.L. Polk & Co.*‡	California AG (legacy) (as S&P Global Inc.); Texas (as R.L. Polk & Co.); Oregon (as R.L.POLK & COMPANY; S&P GLOBAL Inc)

268	Spycloud, Inc.*‡	California CPPA (as Spycloud, Inc.); California AG (legacy) (as Spycloud, Inc.)
269	STACKADAPT Inc.*‡	California CPPA (as Stackadapt Inc.); Oregon (as STACKADAPT Inc; Stackadapt Inc.)
270	Start.io Inc.*	California CPPA (as Start.io; Start.io Inc.)
271	STEP2SUCCESS Marketing*‡	California AG (legacy) (as STEP2SUCCESS Marketing)
272	Strategic Data Intelligence*‡	California AG (legacy) (as Strategic Data Intelligence)
273	360 Media Direct*‡	California CPPA (as 360 Media Direct; Subdirect LLC); California AG (legacy) (as 360 Media Direct)
274	Summit Resources, LLC	California CPPA (as Client Command; Summit Resources, LLC); Texas (as Client Command; Summit Resources, LLC)
275	Swarm Holdings, Inc.	California CPPA (as Swarm Holdings, Inc.; The Swarm)
276	Swoop.Com, Inc.	California CPPA (as Swoop; Swoop.Com, Inc.)
277	Amplemarket*‡	California CPPA (as Amplemarket; Tagis, Inc.); California AG (legacy) (as Amplemarket); Texas (as Tagis, Inc.)
278	Tandem Marketing, LLC	California AG (legacy) (as Tandem Marketing, LLC)
279	TASK GENIE Inc*‡	Texas (as Task Genie, Inc.); Oregon (as Datalane; TASK GENIE Inc)
280	Telefi LLC	California AG (legacy) (as Telefi LLC)
281	Telesign Corporation	California CPPA (as Telesign Corporation)
282	Terminus Software, Inc.*‡	California CPPA (as Terminus By Demand Science; Terminus Software, Inc.); California AG (legacy) (as Terminus Software, Inc.)
283	The Data Group	California CPPA (as The Data Group)
284	Tiplinks Inc	California AG (legacy) (as Tiplinks Inc)
285	TL1MKT SL SL*‡	California AG (legacy) (as TL1MKT SL SL)
286	T-MOBILE USA Inc*‡	California CPPA (as T-Mobile USA, Inc.); California AG (legacy) (as T-Mobile USA, Inc.); Oregon (as T-MOBILE USA Inc; T-Mobile USA Inc; T-Mobile USA, Inc.)
287	Traackr, Inc.	California CPPA (as Traackr, Inc.); California AG (legacy) (as Traackr, Inc.)
288	Triplelift, Inc.*	California CPPA (as Triplelift; Triplelift, Inc.)
289	True Opulence Corporation	California CPPA (as True Opulence Corporation)
290	Tymax Media*‡	California AG (legacy) (as Tymax Media)
291	Ubermedia*‡	California AG (legacy) (as Ubermedia)
292	Unity Technologies SF*‡	California AG (legacy) (as Unity Technologies SF)
293	Unmask, LLC	California CPPA (as Unmask, LLC)

294	Usadata, Inc.*‡	California CPPA (as Usadata, Inc.); California AG (legacy) (as Usadata, Inc.); Texas (as Usadata, Inc.)
295	Uspeoplesearch.Com, LLC	California CPPA (as Uspeoplesearch.Com, LLC)
296	Vendelux	California CPPA (as Vendelux)
297	Visitq.io	California CPPA (as Visitq; Visitq.io)
298	Vistar Media, Inc.	California CPPA (as Vistar Media, Inc.)
299	Vror LLC*	Texas (as Vror LLC)
300	VRTCAL Markets Inc*	California CPPA (as VRTCAL Markets Inc); California AG (legacy) (as VRTCAL Markets, Inc.)
301	Wholesale Mail	California AG (legacy) (as Wholesale Mail)
302	Wisdom Media Group LLC*‡	California AG (legacy) (as Wisdom Media Group LLC)
303	Wiza, Inc.*‡	California AG (legacy) (as Wiza, Inc.)
304	Wunderkind Corporation	California CPPA (as Wunderkind; Wunderkind Corporation)
305	Xad, Inc.*‡	California CPPA (as Groundtruth; Xad, Inc.); California AG (legacy) (as Groundtruth; Xad, Inc.)
306	X-Mode Social, Inc.	California AG (legacy) (as X-Mode Social, Inc.)
307	Yobi Ventures, LLC	California AG (legacy) (as Yobi Ventures, LLC)
308	ZENLEADS Inc*‡	California CPPA (as Apollo.io; Zenleads Inc.); California AG (legacy) (as Apollo.io; Zenleads Inc.); Oregon (as Apollo.io; ZENLEADS Inc)
309	ZS ASSOCIATES Inc*‡	California CPPA (as ZS Associates, Inc.); California AG (legacy) (as ZS Associates, Inc.); Texas (as ZS Associates, Inc.); Oregon (as ZS ASSOCIATES Inc)

Appendix B: Complete Normalized Data Broker Registry

Detailed information about all data brokers analyzed, including those identified above as not registered in your state and brokers listed across multiple registries, is available in the accompanying file, “Data_Broker_Full_Registry_2025.xlsx.” This file provides standardized contact details, registry affiliations, data collection practices, and grouping identifiers to support further investigation and enforcement activities.