



**Re: *In re Plaid, Inc. Privacy Litigation***  
**Case No. 4:20-md-03056**  
**Report for Cy Pres Award**  
**April 2025 through October 2025**

### **About Privacy Rights Clearinghouse**

Privacy Rights Clearinghouse (PRC) is a 501(c)(3) nonprofit organization dedicated to increasing access to information, policy discussions, and meaningful rights so data privacy can be a reality for everyone. With over 30 years of organizational experience and a dedicated focus on data privacy, PRC serves as a recognized leader in consumer education and advocacy.

Our organization was founded on the belief that people deserve the opportunity to be informed of their rights and be heard by those who represent them. This serves as our team's motivation as we work toward a future where privacy rights are accessible, available choices are clear, and both are reflected in the products and services consumers use and interact with on a daily basis.

Each of our programs provides services that connect people with one another or to relevant resources to help them better understand and advance consumer privacy rights.

PRC's consumer education and outreach program increases access to information to expand public awareness and understanding of existing data privacy rights and choices. To accomplish this, we

- publish clear overviews of complex data privacy laws
- create educational resources that provide context for rights and choices that lie at the intersection of data privacy and health, employment, finance, education, and housing
- engage in community outreach

PRC's consumer and policy advocacy program defends and advances consumer data privacy protections by

- providing expert policy analysis and input at the state and national level;
- focusing strategic advocacy in California, a state that has long served as a driver of data privacy protections nationwide

- coordinating advocates to enhance their public policy capacity with respect to consumer data privacy issues

PRC's privacy research tools program provides researchers, journalists, policymakers, and advocates with access to issue-relevant data and information to better and more efficiently understand data privacy issues by

- building and maintaining databases and interactive tools to help analyze complex data
- publishing reports analyzing emerging issues and trends

## **Cy Pres Funds**

Privacy Rights Clearinghouse has spent \$666,785 of the *In re Plaid Litigation* Settlement cy pres award funds as of March 28, 2025. \$91,632 of the \$758,417 cy pres award remains.

The report below provides an overview of Privacy Rights Clearinghouse's recent activities that have benefitted from cy pres award funds.

## **Program Updates**

### **Privacy Research Tools**

PRC's Privacy Research Tools project centers on publicly accessible databases, interactive visual dashboards, and reports designed to help individuals explore and better understand privacy-related issues. These tools currently focus on two topics central to improving consumer financial and online privacy: data breaches and the data broker industry. When personal information is compromised or sold to third parties with whom consumer have no direct relationship, consumer trust erodes and people face increased security and privacy risks.

Our tools help users identify patterns, evaluate the effectiveness of existing law and regulations across the U.S., assess privacy and security claims made by consumer products and services in privacy statements and marketing materials, and raise awareness to promote better data practices.

Since our last report, we have released new versions and resources related to our Data Breach Chronology and Data Broker projects.

### **Data Breach Chronology**

In late January, 2025, we launched version 2.0 of our [Data Breach Chronology](#)—a project to collect, standardize, and analyze available state and federal agency-reported data breach notices over time. The goal of this project is to support a better understanding of gaps in data practices and existing law to improve consumer privacy and security.

In Summer 2025, we developed entirely new project resources including

- a searchable public database containing over 84,000 reported breach notifications from 2005 to present (updated monthly),
- information about state and federal agency reporting,
- breakdowns on the industries most affected and breach types,
- an analysis of information breached, and

- data describing when breaches are reported throughout the year.

Since the January 28, 2025 launch, the project's interactive dashboards have been viewed over 250,000 times, and we have granted complimentary access to the entire underlying database to more than 90 academic researchers whose work has the potential to advance consumer data privacy or security.

### ***U.S. Data Breach Notification Law Dashboards***

We are preparing a 2025 update of our interactive [dashboard](#) comparing state data breach notification laws from a consumer perspective. Additionally, our [dashboard](#) to compare breach-related information that state agencies report publicly has been updated and viewed over 28,000 times.

### ***Data Broker Project***

In April 2025, we standardized and integrated public data from state data broker registries (CA, VT, TX, and OR), creating a useful resource for U.S. consumers, advocates, and policymakers. Our [Data Broker Database](#) and accompanying resources help users better understand the data broker landscape and available opt-out and data deletion options.

### **Consumer and Policy Advocacy**

PRC advocates for meaningful privacy rights and protections across the U.S. Our recent work centers on increasing transparency and accountability around the data broker industry, ensuring existing rights are accessible to consumers, raising awareness about gaps in student privacy for higher education students, and facilitating consumer privacy advocacy in California.

### ***Advocacy to Improve Student Privacy Protections***

PRC is co-sponsoring a bill (AB 1159) in the 2025/2026 California legislative session to better protect student privacy. The CA Learner Personal Information Protection Act extends critical protections to higher education students, strengthens data minimization requirements for all students (preschool through higher ed), and adds enhanced enforcement in the form of a private right of action.

### ***Advocacy for Improved Data Broker Practices and Accountability***

PRC has long advocated for increased transparency and accountability in the data broker industry. Data brokers are a common subject of individual complaints directly submitted to our organization. Reporters, researchers, and government agencies have also highlighted this industry increasingly in recent years. Unchecked and working in the shadows, data brokers can help criminals commit identity crime and financial fraud, facilitate stalking, subject individuals to abusive and discriminatory practices, impact a person's access to healthcare and employment, and compromise national security.

In Summer 2025, we collaborated with Electronic Frontier Foundation to use our Data Broker Database project to analyze and then highlight discrepancies in data broker registrations across the U.S. We [published the analysis](#) and sent letters highlighting the issue to state agencies.

We have been actively involved in supporting the implementation of the California Delete Act, which we co-sponsored in 2023. We provide policy input to groups and lawmakers interested in adopting data broker protections in various states across the U.S., and are currently drafting model bill language to serve as a resource across the U.S. for publication in early 2026.

PRC supported a successful 2025 California bill ([SB 361](#)) that will require data brokers to disclose whether they collect account login credentials, government-issued identification numbers, citizenship and immigration status, union membership, sexual orientation, and biometric data.

### ***Support for Legislation to Enhance Consumers' Ability to Exercise Existing Rights***

In California, PRC [supported AB 566](#) as a continuation of our efforts to give people the ability to easily exercise their existing rights. This bill was signed into law following a multi-year advocacy effort, and will require browsers and mobile operating systems to include a setting that allows a consumer to send an opt-out preference signal. Instead of visiting individual websites to opt out of data sales and sharing, consumers will be able to set their preference once in their browser settings—possibly providing a model for adoption across the U.S.

### ***Support for Deadlines for Data Breach Notification***

PRC supported SB 446 to address a critical gap in California's data breach notification law that allowed for substantial lag time in notifying consumers of a data breach. This bill was signed into law, and establishes a 15-day deadline for breach notification.

### ***Research on Online Privacy Issues in Higher Education***

PRC's 2024 report [Paying Twice to Learn: How Higher Education Students May be Forced to Sacrifice Privacy for Digital Learning Tools](#) highlighted gaps in data privacy within higher education digital learning tools that students are often required to purchase and revealed how vague data practices and limited protections leave student privacy vulnerable.

This report informed the education privacy bill Privacy Rights Clearinghouse is cosponsoring in the California legislature, and a pilot project we began in April 2025 to better understand and improve data privacy for California Community College students. We are in the process of hosting listening sessions, disseminating a survey, and creating a model contract and educational materials to consider when adopting digital learning tools in a higher ed setting.

### ***Facilitating Consumer Data Privacy Advocacy***

For nearly two decades, PRC has coordinated advocates to enhance their capacity to engage in policy discussions concerning data privacy issues. We focus strategically on California—a state with a constitutional right to privacy that has long been a driver of data privacy rights across states and nationwide. Our team held our annual advocates' convening in Sacramento in October 2025 and continues to facilitate weekly meetings for advocates.

### ***Consumer Education and Outreach***

We continue to publish new consumer resources, including a place for individuals to search our collection of frequently asked questions or directly submit their own, privacy law overviews that focus on consumer rights, and educational materials centered on the intersection of privacy and housing, finance, education, security, employment, and health.

In addition, we provide commentary and background information to journalists on current privacy issues, and run an intern program that exposes students to consumer privacy education and advocacy work.