

April 30, 2026

The Honorable Bill Huizenga
Vice Chairman, Committee on Financial Services
U.S. House of Representatives
2129 Rayburn House Office Building
Washington, DC 20515

Dear Vice Chairman Huizenga:

The undersigned insurance trade associations thank you for introducing the GUARD Financial Data Act and for your work in drafting this crucial legislation to modernize the Gramm-Leach-Bliley Act and create a data privacy framework to protect consumers. As a proud longstanding conscientious and responsible guardian of customers' personal information, the insurance industry values the work to bring existing consumer protections into line with modern and necessary additional protections to strengthen GLBA, providing an even more durable future. Further, we appreciate the House Financial Services Committee's coordination with the House Energy and Commerce Committee in harmonizing the GUARD Act with the SECURE Data Privacy Act to include important entity and data-level GLBA exemptions to further advance uniformity and preemption.

For decades, our industry has appropriately managed consumers' confidential medical and financial information under a complex framework across federal and state privacy laws and regulations. These requirements have provided a rigorous framework for protecting the privacy, use, and security of customers' personal information, reflecting a crucial balance between consumers' legitimate concerns over their own data use and regulation with their desire to acquire affordable and accessible financial services and products.

Data collection and use have changed significantly since GLBA's enactment, and states have taken increasingly different approaches to modernizing privacy protections. As a result, consumers face a confusing and harmful patchwork of laws, underscoring the need for federal preemptive legislation. The GUARD Financial Data Act would replace this patchwork with consistent, nationwide rules that provide equal protections for the confidentiality and security of consumers' personal information.

We support the GUARD Financial Data Act's approach to protecting consumer data privacy and modernizing existing GLBA protections. Specifically, the insurance trade associations support the inclusion of language addressing data minimization, rights to access, correction, and deletion, as well as maintaining necessary exceptions to balance customer

understanding and control of their data so insurers can administer customer accounts and products without undue delay or burden to the customer. Importantly, this legislation also demonstrates a commitment to the consistent overall GLBA approach of opt-out for nonpublic personal information, still allowing for necessary exceptions.

Additionally, we support the strong preemptive language which makes clear that consumers will be protected by a uniform ceiling of regulations, while also maintaining state enforcement provisions consistent with the McCarran-Ferguson Act.

To maintain consistent application and effectuate consumer understanding of their rights, this Act appropriately does not include a private right of action. We urge this Committee to maintain this commitment to uniformity by not including this provision, which can complicate consistent understanding and application of privacy rights, lead to extensive litigation by bad-faith actors passing harm to consumers via less affordable and accessible products, and disproportionately burden smaller entities leading to a less diverse marketplace.

As an industry, we have long advocated for common-sense, consumer-oriented policy proposals and customers have depended on our ability to protect their financial futures. This Act is a step in the right direction towards furthering those protections into the future. We, the undersigned organizations, thank you for your leadership in sponsoring this bill. We look forward to working with you and your staff to advance this legislation.

Please do not hesitate to contact any of the organizations below with questions.

Sincerely,

American Council of Life Insurers

American Property Casualty Insurance Association

Council of Insurance Agents and Brokers

Independent Insurance Agents and Brokers of America

National Association of Insurance and Financial Advisors

National Association of Mutual Insurance Companies

Cc: The Honorable French Hill, Chairman