

[Law Firm or Compliance Consultant Letterhead]

[Date]

[Client Name]

[Client Address]

[City, State, Zip Code]

## **Re: Legal Opinion - Financial Services Consumer Privacy Exemption**

Dear [Client Contact Name],

This letter provides our formal opinion regarding the applicability of consumer privacy exemptions to [Client Name] ("the Company") under [State/Federal Privacy Law, e.g., CCPA/CPRA or GLBA].

### **1. Scope of Review**

We have reviewed the Company's data collection practices, internal privacy controls, and business operations to determine if they qualify for specific exemptions related to financial services.

### **2. Factual Background**

It is our understanding that the Company is a [Type of Institution, e.g., Credit Union, Investment Advisor] regulated by [Regulating Body, e.g., SEC, FDIC]. The Company collects "nonpublic personal information" (NPI) as defined by the Gramm-Leach-Bliley Act (GLBA).

### **3. Analysis of Exemption**

Under [Section Number of Applicable Law], an exemption exists for information collected, processed, sold, or disclosed pursuant to the GLBA. Specifically:

- The Company is a "Financial Institution" as defined by the GLBA.
- The data in question is collected in the course of providing financial products or services.
- The Company maintains a written Information Security Program (WISP) in compliance with the Safeguards Rule.

### **4. Conclusion and Opinion**

Based on the foregoing, it is our opinion that the Company's financial data processing activities are exempt from the [Specific Privacy Law] requirements. However, this exemption does not apply to [List non-exempt data, e.g., general website tracking or HR data].

### **5. Limitations**

This opinion is based on current laws and the facts provided by the Company. Should the Company's business model or the regulatory landscape change, this opinion may no longer be valid.

Sincerely,

[Signature]

[Name of Attorney/Consultant]

[Title]