

**Testimony Submitted by**  
**Chris Coughlin, Policy Director**  
**Oregon Consumer Justice**  
**To the House Committee On Commerce and Consumer Protection**

03/18/2025

Regarding: Support for HB 3875

Chair Sosa, Vice-Chair Chaichi, Vice-Chair Osborne, and Members of the Committee,

For the record, my name is Chris Coughlin. I appreciate the opportunity to testify today on behalf of Oregon Consumer Justice in support of HB 3875 with the requested amendment. .

Oregon Consumer Justice (OCJ) envisions a vibrant future where all Oregonians live with dignity and abundance and experience health, joy, and economic opportunity. We work collaboratively across policy and advocacy, community engagement, and the law, to realize a more just and equitable Oregon where people come first. For too long, flawed systems and policies have stood in the way of this reality, with communities of color most often experiencing significant harm. Informed by consumer insights, OCJ works to make financial and business transactions reliably safe and supports Oregonians in knowing and exercising their consumer rights.

A recent Consumer Reports article highlights that modern vehicles function as "computers on wheels," continuously collecting and transmitting personal data, often to third parties, with little transparency or consumer control.<sup>1</sup> Without strong protections, this widespread data collection poses significant privacy risks and leaves consumers vulnerable to tracking, profiling, and potential misuse of their personal information.

Oregonians should have control over the personal data that their vehicles collect, just as they do for data collected from other consumer technologies. Modern vehicles are increasingly connected, gathering vast amounts of sensitive information—including

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<https://www.consumerreports.org/electronics/personal-information/how-to-stop-your-car-from-collecting-sharing-driving-data-a1233378612/>

location data, driving habits, biometric information, and even personal communications. Without clear regulations, this data can be exploited for profit or misused in ways that violate consumer privacy.

This bill closes a critical gap by clarifying that **all** vehicle manufacturers and their affiliates must comply with Oregon's existing data privacy laws. It ensures that consumers have the right to access, delete, and opt out of the sale of their vehicle-generated data, just as they would with other businesses that collect their personal information.

As data privacy and technology continue to evolve, policy must proactively prioritize consumer-focused legislation. We see HB 3875 as an important first step to ensure all cars are included under Oregon's data privacy laws.

As privacy conversations continue, overtime we believe that Oregon needs to strengthen protections including:

- **Enhanced Consumer Consent:** Manufacturers must obtain explicit consent from consumers before collecting, processing, or sharing personal data obtained through vehicle usage.
- **Data Minimization:** Only data essential for the vehicle's operation and improvement should be collected, limiting unnecessary data accumulation.
- **Transparency and Accountability:** Manufacturers should be required to disclose their data collection practices, allowing consumers to make informed decisions about their privacy.

This legislation is an important first step to protect Oregonians from potential data misuse and unauthorized third-party access. Similar protections have been implemented in other states, recognizing that cars are no longer just transportation—they are rolling data collection devices.

I urge the committee to support HB 3875 with the requested amendment this year to help ensure that Oregonians' privacy rights keep pace with technological advancements.