

# Enforcement of Privacy Laws: Trends and Takeaways

**Discussion Leads: Jameson Spivack and Bailey Sanchez**

## SESSION DESCRIPTION

With lingering uncertainty about federal regulators' priorities in the new administration, agencies such as the FTC are likely to take a different enforcement approach than the Commission has pursued in the past four years. What will this mean in practice? As new state privacy laws take effect (some with limited guidance), understanding the priorities of state enforcers will be essential, particularly in areas related to location, health, and other sensitive data. Attorneys General offices with significant resources, particularly in Texas and California, will be major players to watch. Class action lawsuits continue to move forward under specific statutes. And looking outside the U.S., what enforcement activities might we expect in the coming year, particularly when it comes to the intersection of privacy and AI?

## 5–8 KEY DISCUSSION QUESTIONS

1. Which regulators or jurisdictions (either within the U.S. or globally) are you most closely watching for enforcement actions, settlements, and guidance?
2. How, if at all, has your organization's compliance strategy shifted in response to changes in state-level privacy law enforcement? How might it change in response to the new administration and new leadership at federal agencies?
3. Has your organization's approach to privacy changed at all in anticipation of changes in regulatory enforcement? If so, how?
4. Have other practice areas taken priority, such as AI, cybersecurity, or antitrust?
5. Is your organization working to harmonize its approach to privacy and AI across jurisdictions as new laws start taking effect? Is this raising any particular challenges?
6. What role do you think privacy regulators will play in enforcing emerging AI laws, or applying data protection laws to LLMs and AI systems? Might new regulators be created to enforce AI laws?
7. Are there any particular issue areas (e.g., biometrics, location data, youth data) for which it would be helpful to develop best practices?

## 0–3 PRE-READ DOCUMENTS (optional)

- [State Privacy Enforcement Tracker](#)
- [U.S. Privacy Enforcement Report \(2024\)](#)
- [Processing of Personal Data for AI Training in Brazil: Takeaways from ANPD's Preliminary Decisions in the Meta Case](#)