

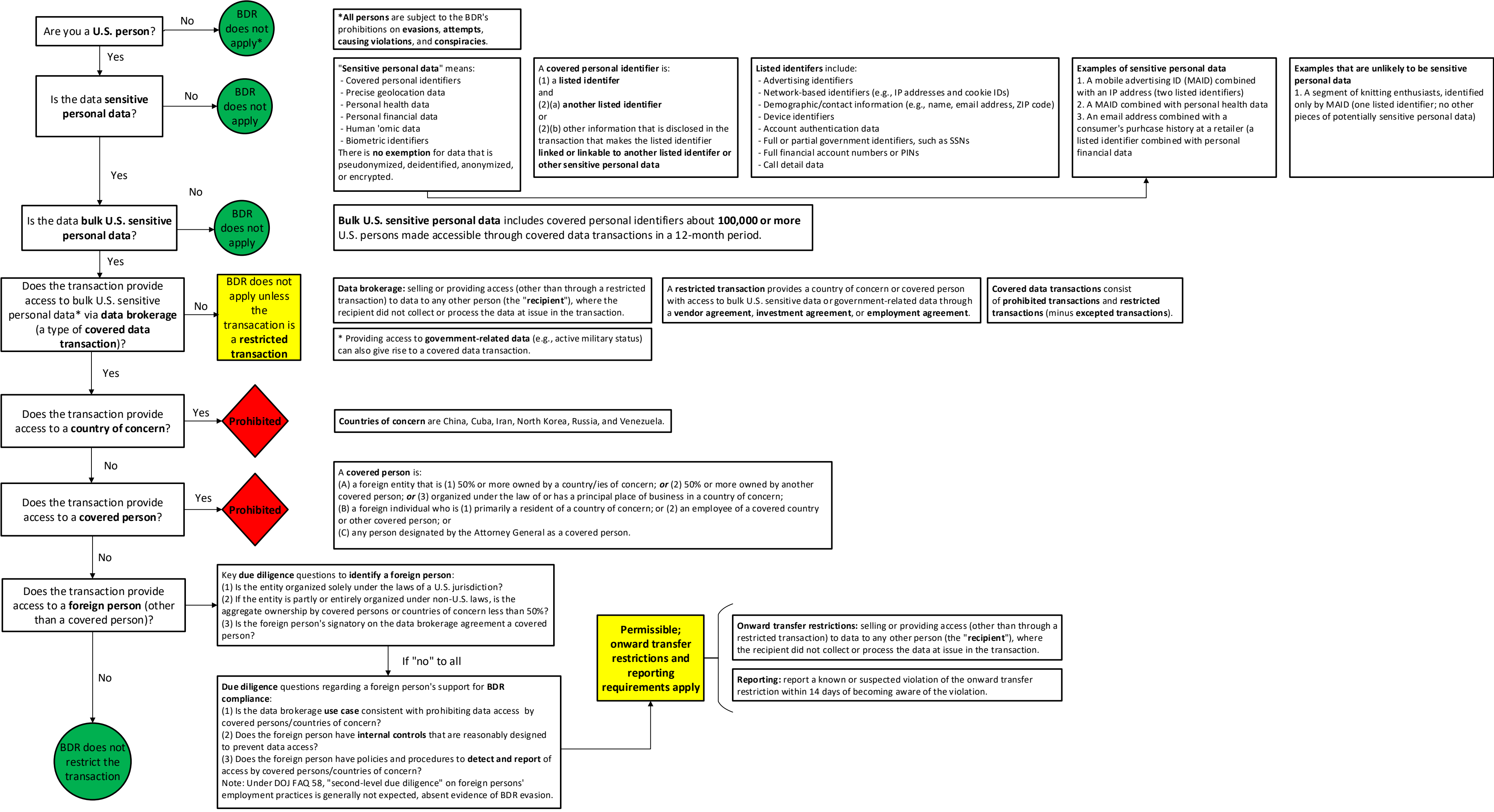
Bulk Data Access Rule ("BDR") Decision Tree: Key Provisions for Advertisers

Key Dates

April 8, 2025: BDR becomes effective (except Subpart J (due diligence and auditing for restricted transactions) and certain reporting requirements)

April 8 - July 8, 2025: Limited civil enforcement: DOJ will not prioritize enforcement against companies that engage in "good faith efforts to comply with or come into compliance" with the BDR.

October 6, 2025: all BDR provisions are effective



Key resources:

Text of the Bulk Data Access Rule: 28 C.F.R. Part 202, <https://www.ecfr.gov/current/title-28/chapter-I/part-202?toc=1>

Department of Justice, "Data Security Program: Frequently Asked Questions," <https://www.justice.gov/opa/media/1396351/dl> ("FAQs")

Federal Register Notice of the final Rule: 90 Fed. Reg. 1706 (Jan 8, 2025), <https://www.federalregister.gov/documents/2025/01/08/2024-31486/preventing-access-to-us-sensitive-personal-data-and-government-related-data-by-countries-of-concern>

Executive Order 14117, "Preventing Access to Americans' Bulk Sensitive Personal Data and United States Government-Related Data by Countries of Concern," <https://www.federalregister.gov/documents/2024/03/01/2024-04573/preventing-access-to-americans-bulk-sensitive-personal-data-and-united-states-government-related>