Data Science & Engineering Experts, Inc.

Financial Services Regulatory Deadline Tracker 2023-2026

GLBA | NYDFS Part 500 | NYDFS Part 23 | CCPA/CPRA | SEC Reg S-P | By Entity Type

Prepared for: Chief Compliance Officer, General Counsel, Board Risk Committee, Internal Audit
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Web: thedataexperts.us/engage

Not legal advice. This is a compliance program aid. Regulatory citations and deadlines reflect publicly available guidance as of publication and must be verified against current rule text and qualified counsel for institution-specific application.

Regulatory Deadline Tracker (Chronological)

All dates across GLBA, NYDFS Part 500, NYDFS Part 23, CCPA/CPRA, and SEC Reg S-P. The Status and Owner columns are fillable - assign and track each obligation. Rows tinted amber require date verification (see the legal-review flag below the table).

Deadline Date	Framework & Rule	Requirement	Entity Types Affected	Status	Owner	Penalty for Non-Compliance
Jan 1, 2023	CCPA/CPRA	CPRA employee/B2B data exemption sunset (HR and B2B data now in scope).	All CA-operating financial institutions			$2,500 / $7,500 per consumer per incident
June 9, 2023	GLBA - FTC Safeguards Rule	Full compliance with all 9 elements of 16 CFR 314.4.	Non-bank FIs under FTC jurisdiction			Up to $100,000 per violation (institution)
Dec 1, 2023	NYDFS Part 500 (500.17)	Updated incident notification + ransom/extortion-payment reporting enforceable.	NYDFS covered entities			$2,500 - $75,000 per day
Apr 29, 2024	NYDFS Part 500 (500.11)	TPSP policy, vulnerability management, patch/asset policies, security-awareness training.	NYDFS covered entities			$2,500 - $75,000 per day
May 13, 2024	GLBA - FTC Safeguards Rule	Breach notification to FTC within 30 days (>=500 consumers, unencrypted customer info).	Non-bank FIs under FTC jurisdiction			Up to $100,000 per violation (institution)
Nov 1, 2024	NYDFS Part 500 (500.4/.15/.16/.19)	Governance (board/CISO), encryption (compensating controls removed), IRP/BCDR testing, exemption updates.	NYDFS covered entities			$2,500 - $75,000 per day
2024 (ongoing) [VERIFY - see flag]	SEC Reg S-P (2024 amendments)	Compliance period begins; incident-response program + customer breach notification (verify Federal Register pub date).	Broker-dealers, RIAs, investment companies			Civil penalties per violation
May 1, 2025	NYDFS Part 500 (500.5/.7/.14)	Automated vulnerability scanning, access/privilege management, advanced threat protection + training.	NYDFS covered entities			$2,500 - $75,000 per day
Nov 1, 2025	NYDFS Part 500 (500.12/.13(a))	Universal MFA for all access + formal asset-inventory policies.	NYDFS covered entities			$2,500 - $75,000 per day
April 15, 2026	NYDFS Part 500 (500.17(b))	First annual certification covering MFA + asset inventory (Certification OR Acknowledgment).	NYDFS covered entities			$2,500 - $75,000 per day
Ongoing / Annual	NYDFS Part 500 (500.17(b))	Annual certification each April 15 (dual-track), signed by top executive + CISO.	NYDFS covered entities			$2,500 - $75,000 per day
Ongoing	CCPA/CPRA	Consumer-rights requests: 45-day response, extendable to 90 days.	CA-operating financial institutions			$2,500 / $7,500 per consumer per incident
Ongoing	GLBA	Third-party service provider annual review obligations.	Covered financial institutions			Up to $100,000 per violation (institution)

Deadline Date	Framework & Rule	Requirement	Entity Types Affected	Status	Owner	Penalty for Non-Compliance
Jan 1, 2027	CCPA/CPRA (ADMT rules)	Automated decision-making technology rules effective for significant financial decisions.	CA-operating FIs using ADMT			$2,500 / $7,500 per consumer per incident
2025-2026 (verify) [VERIFY - see flag]	SEC Reg S-P (2024 amendments)	Final compliance deadline tiered: larger then smaller BDs/advisers (verify Federal Register pub date).	Broker-dealers, RIAs			Civil penalties per violation

LEGAL-REVIEW FLAG - SEC Reg S-P dates. The exact final compliance deadlines for the SEC Reg S-P 2024 amendments are tied to the Federal Register publication date and are tiered by entity size (general understanding: larger entities approximately late 2025, smaller entities approximately mid-2026). Verify the Federal Register publication date and your entity's tier before relying on any specific Reg S-P date in this tracker.

Penalty Summary by Framework

Penalty figures are stated conservatively. Where an exact criminal dollar figure is uncertain, the statutory basis is described generally rather than asserting a precise number.

Framework	Regulator	Violation	Per-Day or Per-Consumer Penalty	Criminal Exposure	Notable Recent Actions
NYDFS Part 500	DFS	Per-day violation	$2,500 - $75,000 per day (by tier)	N/A	Block/Cash App $40M (2025); Genesis $8M (2024); PayPal $2M (2025).
GLBA - FTC Safeguards	FTC	Per violation	Up to $100,000 per violation (institution)	Officers may face fines and imprisonment up to 5 years for knowing and willful GLBA violations (per statute).	Limited public cases; enforcement focuses on Safeguards deficiencies.
CCPA/CPRA	CPPA / CA Attorney General	Per consumer per incident	$2,500 unintentional / $7,500 intentional (or involving minors)	N/A	AG / CPPA settlements (e.g., data-broker and retailer-tracking actions).
SEC Reg S-P	SEC	Per violation	Civil penalties per violation (statutory tiers)	Criminal referral possible for willful securities-law violations.	Enforcement ramping 2025-2026 as amendments phase in.

Priority Action Summary - If You Are Starting From Zero

Ranked by penalty exposure and deadline urgency. Identify your entity type(s) - an institution can be more than one - and work the actions top to bottom.

#	Entity Type	Priority Action	Why It Ranks Here
1	NYDFS covered entity	Confirm universal MFA (Nov 1, 2025) and asset-inventory policies are live before the April 15, 2026 certification.	Per-day penalties up to $75,000; the 2026 cert specifically covers these two items.
2	NYDFS covered entity	Prepare the dual-track April 15 filing (Certification or Acknowledgment) with top-executive + CISO signatures.	A late or unsigned filing is itself a violation; retention is 5 years.
3	NYDFS covered entity	Verify the 72-hour incident and 24-hour ransom notification procedures (with 30-day OFAC explanation) are tested.	Reporting failures compound the underlying incident exposure.
4	Non-bank FI (FTC jurisdiction)	Confirm all 9 elements of the FTC Safeguards Rule (16 CFR 314.4) are implemented.	Full compliance was due June 9, 2023; gaps are immediately actionable.
5	Non-bank FI (FTC jurisdiction)	Stand up FTC breach notification (within 30 days, >=500 consumers, unencrypted).	Effective May 13, 2024; missing the process risks a separate violation.
6	Broker-dealer / RIA	Build the Reg S-P incident-response program and customer breach-notification capability (notify no later than 30 days).	Compliance dates are tiered and tied to Federal Register publication - verify and plan now (see amber flag).
7	CA-operating FI	Build the GLBA vs CCPA/CPRA data inventory; HR, B2B, marketing, and web data are NOT exempt.	Misclassifying non-exempt data drives per-consumer penalties and litigation.
8	CA-operating FI	Stand up the consumer-rights process (45/90-day response) and recognize GPC opt-out signals.	Ongoing obligation; failures accrue per consumer per incident.
9	CA-operating FI	Inventory automated decision-making technology ahead of the Jan 1, 2027 ADMT rules.	Lending/financial 'significant decisions' are explicitly in scope.
10	All covered FIs	Run an annual cross-framework gap assessment and document good-faith remediation timelines.	Good-faith, documented remediation mitigates penalties across all four regimes.

> Need a compliance sign-off? DSE reviews programs against all of these frameworks and provides written gap assessments. Start with our complimentary scoping call. thedataexperts.us/engage