Preliminary Draft of the Privacy Program Report Template

NOTICE: This document is a *preliminary draft* of the Privacy Program Report Template and has not yet been finalized by the Utah Office of Data Privacy. It is provided for review and comment purposes only.

The Office welcomes and encourages public and stakeholder feedback to inform the finalization of this template. To ensure your input is considered, please submit all comments, questions, or suggestions to officeofdataprivacy@utah.gov no later than July 21, 2025.

The final version, *Privacy Program Report Template 1.0*, is scheduled for official release on August 1, 2025.

Disclaimer: The following document is intended to be a draft template of a privacy program report that a governmental entity may use to fulfill the requirements of Utah Code § 63A-19-401.3. An entity that uses the template must revise and refine the template to be specific to the particular entity; this includes reformatting and accounting for any relevant laws, regulations, rules, policies, etc. to which the entity may be subject. The template is not legal guidance and should be reviewed and discussed with an entity's legal counsel to determine applicability and compliance.

Utah Governmental Entity Privacy Program Report Template

- This report is required to be completed on or before Dec 31 annually by governmental entities. (Utah Code § 63A-19-401.3)
- Governmental entities are required to initiate a data privacy program before December 31, 2025. (Utah Code § 63A-19-401(2)(i))
- A governmental entity that complete this report satisfies the requirement to initiate a privacy program under Utah Code § 63A-19-401(2)(i)

Classification: This report is classified as a **protected record** under Utah Code § 63G-2-305, as required by 63A-19-401.3(2) and may be made available to the Office of Data Privacy upon request.

Section 1:	Governmental	Entity Ir	nformation
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Governmental Entit	y Name:		

[&]quot;Governmental entity" means the same as that term is defined in Section 63G-2-103.

[&]quot;High-risk processing activities" means the same as the term is defined in Section 63A-19-101(17).

[&]quot;Personal data" means the same as the term is defined in Section 63A-19-101(24).

[&]quot;Privacy practice" means the same as the term is defined in Section 63A-19-101(26).

[&]quot;Process," "processing," or "processing activity" means the same as the term is defined in Section 63A-19-101(27).

[&]quot;Purchase" or "purchasing" means the same as the term is defined in Section 63A-19-101(29).

[&]quot;Sell" means the same as the term is defined in Section 63A-19-101(33).

Government Entity Type (Select One):	
☐ State Agency	☐ Interlocal
☐ County	Associations of Government
☐ Municipality	☐ Charter School
☐ Special Service District	☐ Public School
☐ Board or Commission	Independent or Quasi-Government
□ College or University	☐ Other
Mailing Address:	
Chief Administrative Officer (CAO):	
• Name:	
• Title:	
Email:	
Phone:	
Date of Report Completion:	

Estimated Number of Unique Individuals Whose Personal Data Was Processed by the Entity in the Past Year

,	Select the best estimate based on available information to yo	ur governmental entity.
	☐ Fewer than 1,000	□ 100,000 – 499,999
l	□ 1,000 – 4,999	□ 500,000 – 999,999
I	□ 5,000 – 24,999	☐ 1 million or more
I	□ 25,000 − 99,999	☐ Unknown
ı		

This is an optional question and may be used by policy makers to best determine how to assist governmental entities of different sizes and resources in implementing and maturing their privacy programs so as to best protect individual's

Section 2: Privacy Program Status

privacy interests.

Fulfills requirement of Section 63A-19-401.3(1)(a):

The chief administrative officer of each governmental entity shall prepare a report that includes...whether the governmental entity has initiated a privacy program

A privacy program is the structured collection of a governmental entity's privacy practices, policies, and procedures that govern its processing and protection of personal data to ensure compliance with applicable laws. A governmental entity's privacy program will meet the December 31, 2025, deadline even if it is not mature and/or in its early stages so long as the entity has fully completed its privacy program report or initiated its program through other means the entity has determined to meet the requirements of the Government Data Privacy Act.

•	Has your gover	nmental entity initiate	ed a privacy program?
	☐ Yes	□ No	
•	What mechanis	m(s) has your gover	nmental entity used to Initiate its privacy program?
	☐ Administ	rative Rule	
	☐ Ordinand	e	
	□ Resolution	on	
	□ Policy		
	☐ Privacy F	Program Report	
	☐ Other:		

Section 3: Privacy Practices, Maturity and Strategies

Fulfills requirement of Section 63A-19-401.3(1)(b)(i) and (ii)

The chief administrative officer of each governmental entity shall prepare a report that includes...any privacy practices implemented by the governmental entity...[and]... strategies for improving the governmental entity's privacy program and practices.

The privacy practices listed below are from the Privacy Program Framework v1.0 created and maintained by the Office of Data Privacy and may be viewed on <u>Privacy.Utah.Gov</u>. Version 1.0 of the framework includes generally applicable privacy practices of the government entitled in GDPA, GRAMA, DARS and some administrative rules. The Framework also includes a maturity model for each privacy practice. <u>The Office of Data Privacy is currently creating predefined strategies to mature specific practices in the framework that an entity may choose to select from and include in this report to fulfill the requirements of Section 63A-19-401.3(1)(b)(ii). The template will be updated with predefined strategies once available. Governmental entities may define their own strategies in lieu of using predefined strategies.</u>

Entities should amend this section to include other privacy practices the entity may implement due to more specific or restrictive laws.

Level	Description
Level 0 Non-Existent	The practice is not implemented or acknowledged.
Level 1 Ad Hoc	The practice may occur but is undocumented (no policies or procedures), application is reactive and not standardized.
Level 2 Defined	The practice is implemented and documented, but documentation may not cover all relevant aspects, and application may be informal and inconsistent.
Level 3 Consistently Implemented	The practice is documented to cover all relevant aspects, application is formal and consistent.
Level 4 Managed	The practice is actively managed with metrics that are regularly reviewed to assess efficacy and facilitate improvement.
Level 5 Optimized	The practice is fully embedded in the entity with recognition and understanding across the workforce through active training and awareness campaigns, and inclusion in operations and strategy.

Privacy Practices Implemented

List all privacy practices implemented by your governmental entity and, if you are using the Privacy Program Framework, indicate the current maturity level (0–5) for each practice, which strategies from the framework your entity plans to implement during the next calendar year, and select the anticipated target maturity the entity will achieve for a given practice by the end of the calendar year.

Governance						
Practice	Implemented	Current Maturity	Strategies for Improvement	Target Maturity		
Chief Administrative Officer (CAO) Designation	☐ Yes ☐ No	Level 1	Example Strategy: Adopt policy or ordinance that formally adopts this practice and define who will make CAO designation and how that designation will be made.	Level 2 ·		
2. Records Officers Appointment	☐ Yes ☐ No	Level 1	Example Strategy: Adopt policy or ordinance that formally adopts this practice and defines how the CAO will make records officer appointments and review those appointments annually.	Level 2		

Record Series						
Practice	Implemented	Current Maturity	Strategies for Improvement	Target Maturity		
Record Series Creation and Maintenance	☐ Yes ☐ No	Level 1		Level 1		

4.	Record Series Designation and Classification	☐ Yes ☐ No	Level 1	Level 1
5.	Retention Schedule Proposal and Approval	☐ Yes ☐ No	Level 0 -	Level 0 -
6.	Record Series Privacy Annotation	☐ Yes ☐ No	Level 0 -	Level 0 ·

Awareness and Training						
Practice	Implemented	Current Maturity	Strategies for Improvement	Target Maturity		
7. Records Officers Training and Certification	✓ Yes □ No	Level 1 •	 Example Strategy: Adopt policy or ordinance that formally adopts this practice and requires records officers to complete annual records officer certification. Example Strategy: The CAO will, annually when this Privacy Program Report is finalized, review/update records officer appointments and verify training and certifications are still completed. 	Level 3 -		
Statewide Privacy Awareness Training	☐ Yes ☐ No	Level 0 •		Level 0		

Identify						
Practice	Implemented	Current Maturity	Strategies for Improvement	Target Maturity		
9. Inventorying	☐ Yes ☐ No	Level 1	 Adopt policy or ordinance that formally adopts this practice. Records Officers will begin creating an inventory of all forms on which personal data is collected (paper and digital forms). 	Level 2		
10. Privacy Impact Assessment	☐ Yes ☐ No	Level 0 -		Level 0 -		

Transparency					
Practice	Implemented	Current Maturity	Strategies for Improvement	Target Maturity	
11. Website Privacy Policy	☐ Yes ☐ No	Level 0 -		Level 0 -	
12. Privacy Notice (Notice to Provider of Information)	☐ Yes ☐ No	Level 1	1. Example Strategy: Adopt policy or ordinance that formally adopts this practice. 2. Example Strategy: Records Officers will ensure all new forms that collect personal data provide notice and	Level 2 ·	

	review the inventory created in Practice 9 to determine if pre-existing forms provide proper notice. If forms do not provide proper notice we will begin updating the forms to include the required notice.	
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Processing				
Practice	Implemented	Current Maturity	Strategies for Improvement	Target Maturity
13. Minimum Data Necessary	☐ Yes ☐ No	Level 0 -		Level 0 ·
14. Record and Data Sharing or Selling	☐ Yes ☐ No	Level 0 -		Level 0 ·
15. Record Retention and Disposition	☐ Yes ☐ No	Level 0 -		Level 0 -

Information Security				
Practice	Implemented	Current Maturity	Strategies for Improvement	Target Maturity
16. Incident Response	☐ Yes ☐ No	Level 0 ·		Level 0 -

☐ Yes ☐ No	Level 0 -		Level 0 -
ı	ndividual Requests		
Implemented	Current Maturity	Strategies for Improvement	Target Maturity
☐ Yes ☐ No	Level 0 ·		Level 0 ·
☐ Yes ☐ No	Level 0 ·		Level 0 ·
☐ Yes ☐ No	Level 0 ·		Level 0 ·
☐ Yes ☐ No	Level 0 ·		Level 0 ·
Other Privacy Practices Implemented by the Governmental Entity			
Implemented	Str	ategies for Improvement	
☐ Yes ☐ No			
☐ Yes ☐ No			
☐ Yes ☐ No			
	Implemented Yes No Yes	Individual Requests Implemented	Individual Requests Implemented

Section 4: High-Risk Processing Activities

Fulfills requirement of Section 63A-19-401.3(1)(b)(iii)

The chief administrative officer of each governmental entity shall prepare a report that includes...the governmental entity's high-risk processing activities.

Governmental entities are required to identify any high-risk processing activities they engage in.

Definition – Utah Code § 63A-19-101(17)

"High-risk processing activities" means a governmental entity's processing of personal data that may have a significant impact on an individual's privacy interests, based on factors that include:

- (i) the sensitivity of the personal data processed;
- (ii) the amount of personal data being processed;
- (iii) the individual's ability to consent to the processing of personal data; and
- (iv) risks of unauthorized access or use.

High-risk processing activities may include the use of:

- (i) facial recognition technology
- (ii) automated decision making
- (iii) profiling
- (iv) genetic data
- (v) biometric data
- (vi) geolocation data

4.1 Select all applicable high-risk processing activities your entity engages in and provide a brief description of the purposes and uses of each.
□ Facial recognition technology Explanation of Purpose:
Automated decision making Explanation of Purpose:
☐ Profiling (e.g., behavioral or predictive analysis) Explanation of Purpose:
☐ Genetic data processing Explanation of Purpose:
☐ Biometric data processing (e.g., fingerprints, voice, iris scans) Explanation of Purpose:
☐ Geolocation data processing Explanation of Purpose:
4.2 Additional high-risk activities (not listed above)
List any other processing activities your entity has identified as high-risk under the statutory definition and a brief description of the purposes and uses of each.
[Insert narrative or list here]

Section 5: Personal Data Sharing, Selling and Purchasing

5.1 Personal Data Sharing, Selling and Purchasing

Fulfills requirement of Section 63A-19-401.3(1)(c) and (d)

The chief administrative officer of each governmental entity shall prepare a report that includes...a list of the types of personal data the governmental entity currently shares, sells, or purchases...[and]...the legal basis for sharing, selling, or purchasing personal data.

Using the checkboxes below identify whether your governmental entity shares, sells or purchases and the types of personal data listed and provides a summary of the legal basis for sharing, selling or purchasing.

Types of Personal Data	Share, Sell and Purchase Status	Legal Basis for Sharing, Selling or Purchasing
Basic Identifiers Full name Date of birth Place of birth Gender Age Social Security Number Driver's license or state ID number Passport number Government-issued identifiers	☐ Share ☐ Sell ☐ Purchase ☐ N/A	
Contact Information • Home address • Email address(es)	☐ Share ☐ Sell	

Phone number(s)Mailing address	☐ Purchase	
Demographic Data Race or ethnicity Marital status Nationality or citizenship	☑ Share ☐ Sell	
 Language preferences Household size or composition 	☐ Purchase	
	□ N/A	
Employment and Professional Information • Job title and position	☑ Share	
Employment historyEmployer name	☐ Sell	
 Professional licenses or certifications Work contact information 	☐ Purchase	
	□ N/A	
Financial Information • Bank account details	☑ Share	
 Credit card numbers Tax identification numbers 	☐ Sell	
Income and wage dataCredit reports or scores	☐ Purchase	
Payment history	□ N/A	
Health and Medical Information Medical history Diagnoses or treatments Mental health data Health insurance information Prescription information	☐ Share	
	☐ Sell	
	☐ Purchase	
	☑ N/A	

Education Information	
 School or institution attended Student ID numbers Grades or transcripts 	
 Special education status Disciplinary records Purchase	
□ N/A	
Government Program or Benefits Data Share Share	
 Program participation (e.g., SNAP, Medicaid, TANF) Eligibility determinations 	
Benefit amounts or disbursements Case management notes Purchase	
Appeals/Decisions N/A	
Biometric Data ■ Fingerprints □ Share	
Facial recognition data Retina or iris scans	
 Voiceprints DNA or genetic information Purchase	
□ N/A	
Online and Digital Identifiers • IP addresses	
 Device IDs Cookies and browser fingerprints 	
 Location data (e.g., GPS) Login credentials Purchase	
 Online activity logs Social Media Handles 	

Criminal or Legal Information	☐ Share ☐ Sell ☐ Purchase ☐ N/A	
Vehicle and Property Data Vehicle registration VIN numbers Property ownership or deed information Property tax records Utility usage data	☐ Share ☐ Sell ☐ Purchase ☐ N/A	
 Photographic or Video Data Surveillance footage Government ID photos School or agency-provided photo records Body camera footage Public meeting recordings 	☐ Share ☐ Sell ☐ Purchase ☐ N/A	
Voting and Civic Data Voter registration Voting history Political district assignments Civic engagement program data	☐ Share ☐ Sell ☐ Purchase ☐ N/A	
Immigration or Travel Information Visa status Travel history or itineraries	☐ Share	

 Customs declarations Immigration proceedings 	☐ Purchase	
Communication and Complaint Data	☐ Share	
 Emails or written correspondence Call transcripts or recordings Case notes related to complaints or service requests 	☐ Sell	
	☐ Purchase	
	□ N/A	
Other Explain	☐ Share	
L.Apiaiii	☐ Sell	
	☐ Purchase	
	□ N/A	

5.2 Personal Data Recipients and Sources

Fulfills requirement of Section 63A-19-401.3(1)(e)(i), (ii) and (iii)

The chief administrative officer of each governmental entity shall prepare a report that includes...the category of individuals or entities with whom the governmental entity shares personal data; to whom the governmental entity sells personal data; or from whom the governmental entity purchases personal data.

Processing Activity	Categories of Recipients or Sources
Personal Data Shared With	 Other Governmental Entities (State, Local, Federal, or Tribal) □ Law Enforcement Agencies □ Judicial or Court Systems □ Third-Party Service Providers / Contractors / Vendors □ Cloud Service Providers / Hosting Platforms □ Research Institutions / Universities □ Nonprofit Organizations □ Private Sector / Commercial Companies □ Healthcare Providers or Health Information Exchanges □ Educational Institutions □ Credit Bureaus or Financial Institutions □ Insurance Providers □ Media or News Organizations □ Foreign Governments or International Organizations □ Data Brokers / Aggregators □ Social Media Platforms □ Individuals (e.g., data subjects or their authorized representatives) Auditors / Oversight Bodies
	☐ Public Disclosure / Open Records Releases

	 □ Emergency Services / Disaster Response Agencies □ Public Utilities or Infrastructure Partners □ Technology Integrators or Software Developers □ Professional Licensing Boards □ Legislative Bodies or Policy Research Organizations □ Regulatory Agencies □ Non-Governmental Watchdogs / Advocacy Groups □ Other □ N/A
Personal Data Sold To	 □ Other Governmental Entities (State, Local, Federal, or Tribal) □ Law Enforcement Agencies □ Judicial or Court Systems □ Third-Party Service Providers / Contractors / Vendors □ Cloud Service Providers / Hosting Platforms □ Research Institutions / Universities □ Nonprofit Organizations □ Private Sector / Commercial Companies
	 ☐ Healthcare Providers or Health Information Exchanges ☐ Educational Institutions ☐ Credit Bureaus or Financial Institutions ☐ Insurance Providers ☐ Media or News Organizations ☐ Foreign Governments or International Organizations ☐ Data Brokers / Aggregators ☐ Social Media Platforms ☐ Individuals (e.g., data subjects or their authorized representatives) Auditors / Oversight Bodies ☐ Public Disclosure / Open Records Releases ☐ Emergency Services / Disaster Response Agencies ☐ Public Utilities or Infrastructure Partners

	 ☐ Technology Integrators or Software Developers ☐ Professional Licensing Boards ☐ Legislative Bodies or Policy Research Organizations ☐ Regulatory Agencies ☐ Non-Governmental Watchdogs / Advocacy Groups ☐ Other ☐ N/A
Personal Data Purchased From	 □ Other Governmental Entities (State, Local, Federal, or Tribal) □ Law Enforcement Agencies □ Judicial or Court Systems □ Third-Party Service Providers / Contractors / Vendors □ Cloud Service Providers / Hosting Platforms □ Research Institutions / Universities □ Nonprofit Organizations □ Private Sector / Commercial Companies
	☐ Healthcare Providers or Health Information Exchanges
	☐ Educational Institutions ☐ Credit Bureaus or Financial Institutions
	☐ Insurance Providers
	☐ Media or News Organizations
	☐ Foreign Governments or International Organizations
	☐ Data Brokers / Aggregators
	☐ Social Media Platforms
	☐ Individuals (e.g., data subjects or their authorized representatives) Auditors / Oversight Bodies
	☐ Public Disclosure / Open Records Releases
	☐ Emergency Services / Disaster Response Agencies
	Public Utilities or Infrastructure Partners
	☐ Technology Integrators or Software Developers
	☐ Professional Licensing Boards

 □ Legislative Bodies or Policy Research Organizations □ Regulatory Agencies □ Non-Governmental Watchdogs / Advocacy Groups □ Other
□ N/A

Section 6: Privacy Training Completion

Fulfills requirement of Section 63A-19-401.3(1)(f)

The chief administrative officer of each governmental entity shall prepare a report that includes...the percentage of the governmental entity's employees that have fulfilled the data privacy training requirements described in Section 63A-19-401.2.

What percentage of your entity's employees completed required privacy training requirements described in Section 63A-19-401.2?

Enter 9	%
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Section 7: Non-Compliant Processing Activities (Must be completed by Dec 31, 2027).

Fulfills requirement of Section 63A-19-401.3(1)(g)

The chief administrative officer of each governmental entity shall prepare a report that includes...a description of any non-compliant processing activities identified under Subsection 63A-19-401(2)(a)(iv) and the governmental entity's strategy for bringing those activities into compliance with Part 4 of the Government Data Privacy Act.

Have any non-compliant processing activities been identified under §63A-19-401(2)(a)(iv)?	
☐ Yes	
□ No	
If yes, provide details:	

Processing Activity Name	Processing Activity Type	Issues Identified	Strategies for Compliance	Estimated Completion Date

Certification

Certification must be completed by the governmental entity's chief administrative officer.
l, the undersigned, certify that the information provided in this report is accurate to the best of my knowledge
Name:
Signature:
Date: