



Practice 9	Inventory
Instructions	<p>Data Inventory is a record of the personal data a governmental entity collects, stores, shares, and processes. It helps identify what data exists, where it resides, who has access to it, and how it flows across systems. A well-maintained data inventory supports compliance, improves data management, and strengthens privacy and security practices.</p> <p>Below is a list of data elements that are legally required to be documented, along with some best practice recommendations.</p>

<b>Processing Systems</b> (Requester: DTS – Only State Agencies) <b>Location: ServiceNow</b>
Authority – <a href="#">DTS 5000-002 section 2.4.2.1</a>

- Record Series
- System/Application Name
- Personal data
- Have you provided a privacy notice
- Have you completed a privacy impact assessment (PIA)

<b>DTS – ServiceNow Additional Fields</b>
Data Elements

- Number
- Name
- Architecture Type
- Install Type
- Agency
- Unit
- Application URL
- Install Status
- Technology Stack
- User Base
- System Users
- Authentication Required
- Authentication Type
- Platform
- Description
- Business Owner
- IT Application Owner
- Support Group
- Business Criticality
- Emergency Tier
- Data Classification
- Certified

**Privacy Annotations – record CONTAINS personal data** (Requester: ODP – Only State Agencies)**Location: Internal**Authority – [Utah Code 63A-19-401.1](#)

- Record Series – *Inventory of all types of personal data included in the series*
- Description – *of all purposes for which the state agency collects, keeps, or uses the personal data*
- Citation – *legal authority for collecting, keeping, or using the personal data*
- Other Information – *any other information required by the rules created by ODP*

**Privacy Annotations - record DOES NOT contain personal data** (Requester: ODP – Only State Agencies)**Location: Internal**Authority – [Utah Code 63A-19-401.1](#)

- Record Series
- Statement – *limited to statement indicating that the record series DOES NOT include personal data*

**Non-Compliant Processing Activities** (Requester: ODP) **Location: Internal**Authority – [Utah Code 63A-19-401](#)

- Non-Compliant Processing Activities
- Strategy – *how will this activity be brought into compliance*

**Privacy Program Report** (Requester: ODP) **Location: Internal**Authority – [Utah Code 63A-19-401.3](#)

- Have you initiated a privacy program
- Description of privacy practices
- Description of strategies for improving privacy program and practices
- High-Risk processing activities
- List of the type of personal data shared
- List of the type of personal data sold
- List of the type of personal data purchased
- Legal basis for sharing personal data
- Legal basis for selling personal data
- Legal basis for purchasing personal data
- Category of individuals or entities with whom an entity shares personal data
- Category of individuals or entities with whom an entity sells personal data
- Category of individuals or entities with whom an entity purchases personal data
- % of employees that have fulfilled privacy training requirements
- Description of any non-compliant processing activities
- Strategies for bringing non-compliant processing activities into compliance

**Privacy Notice – private** (Requester: ODP) **Location: Internal**Authority – [Utah Code 63A-19-402](#)

- Record Series
- Intended purposes & uses of personal data
- Consequences for refusing to provide personal data
- Classes of persons & govt. entities with whom entity shares data
- Classes of persons & govt. entities with whom entity sells data

<b>Privacy Notice – public</b> (Requester: ODP) <b>Location: Internal</b>
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Authority – <a href="#">Utah Code 63G-2-201</a>
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- Statement indicating that the individual's personal data may be available to the public

<b>Div. of Archives and Records Service</b> (Requester: DARS) <b>Location: Internal or report to DARS (AXAEM)</b>
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Authority – <a href="#">63A-12-107</a> , <a href="#">63A-12-103</a> , <a href="#">63A-12-101</a> , <a href="#">Utah Administrative Code R17</a>
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- Record Series
- Title
- Description
- Creation Date – *Start date for data collection*
- Format – *Electronic/Physical*
- Arrangement – *Process of organizing data in a structured way (ex. Alphabetical, numerical, chronological, alphanumerical, database)*
- Retention & Disposition Authorization
- Retention & Disposition
- Format Management
- Primary Designation
- Secondary Designation
- Legal Citation for Designation
- Legal Citation for Secondary Designation(s)
- Primary Record Value - *(i.e. Appraisal) Options: Administrative, Fiscal, Legal, and/or Historical*
- Secondary Record Value - *(i.e. Appraisal) Options: Administrative, Fiscal, Legal, and/or Historical*
- Chief Administrative Officer (CAO)
- Records Officer(s)
- Classification

<b>Other Best Practice Options</b>
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Data Elements
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- System Type – *Software systems, Data Storage & Processing Systems, Cloud & Virtualization Systems, Enterprise Systems, Security & Identity Systems, Industry-Specific Systems, Collaboration & Communication Tools*
- Location – *Where are these records found*
- Posted Privacy Notice – *Y/N*
- Posted Privacy Notice (Public record) – *Y/N*
- Notice Location(s) – *Where are notices posted*
- Privacy Impact Assessment (PIA) – *Completed Y/N, Date last completed*
- Processing Activity Implementation Date – *List anything Pre May 7, 2025 – see Utah Code [63A-19-401](#).*
- Data actions – *Collecting, storing, using, sharing/disclosing, transferring, selling, aggregating, purchasing, transforming, encrypting, deleting, archiving, anonymizing, pseudonymizing*
- Minimum Data necessary – *Flag indicating that data is limited to only what is needed for operational purpose*