Privacy Program Report Template V1.0_2025.08.01

Disclaimer: The following document is intended to be a template of a privacy program report that a governmental entity may use to fulfill the reporting requirements established in Section 63A-19-401.3 of the Government Data Privacy Act (GDPA). 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 v1.0

- The chief administrative officer of each governmental entity must, by December 31st annually, submit a privacy program report (report), in accordance with the specific requirements detailed in Utah Code § 63A-19-401.3. (Utah Code § 63A-19-401.3)
- Fulfilling the reporting requirement can satisfy the requirement under Utah Code § 63A-19-401(2)(a)(i), for a governmental entity to initiate a privacy program by December 31, 2025. (Utah Code § 63A-19-401(2)(b))

Definitions:

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

[&]quot;Governmental entity" means the same as that term is defined in <u>Subsection 63G-2-103(12)</u>.

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

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

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

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

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

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

Section 1: Governmental Entity Information Governmental Entity Name: _____ Governmental Entity Type (Select One): □ Interlocal ☐ State Agency □ County ☐ Associations of Government ☐ Municipality ☐ Charter School ☐ Special Service District ☐ Public School ☐ Board or Commission Independent or □ College or University Quasi-Government □ Other Mailing Address: **Chief Administrative Officer (CAO):** • Name: _____ Title: • Email: _____ • Phone: _____

• Date of Report Completion:

Section 2: Privacy Program Status

Fulfills requirement of Subsection 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 or if it is in its early stages, so long as the entity has fully completed its privacy program report or initiated its program through other means that the entity has determined as meeting the requirements of the Government Data Privacy Act.

•	Has your governmental entity initiated a privacy program ?
	□ Yes □ No
•	What mechanism(s) has your governmental entity used to initiate its privacy program ?
	□ Administrative Rule
	□ Ordinance
	\square Resolution
	□ Policy
	☐ Privacy Program Report
	□ Other:

Section 3: Privacy Practices, Maturity and Strategies

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

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

The privacy practices that are listed below are discussed in the Privacy Program Framework v1.0 (Framework), which the Utah Office of Data Privacy created and maintains, and which may be accessed on Privacy.Utah.Gov. The Framework includes privacy practice requirements that are generally applicable of governmental entities as established in the GDPA, Title 63G, Chapter 2, Government Records Access and Management Act (GRAMA), Title 63A, Chapter 12, Division of Archives and Records Service and Management of Government Records (DARSMGR), and some administrative rules. The Framework also includes a maturity model that entities may use to internally assess via this track the maturity of a specific practice and to assist in defining strategies to mature a specific practice. Use of the maturity matrix is not yet required in law, as such, the Office recommends that entities use the maturity matrix because it does tie in with the Framework and other assistance the Office provides. Use will provide a manner for a clear determination of the improvement of an entity's privacy practices and program.

Entities should revise this section to include other privacy practices that the entity may implement due to entity or data specific laws and regulations.

Privacy Practice Maturity Model:

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

Privacy Practices Implemented:

List all privacy practices implemented, and the strategies your entity will implement, in the coming calendar year to improve its privacy practices and program. The Office recommends entities indicate the current maturity level (0–5) of each practice and select the target maturity they plan to achieve for a given practice by the end of the following calendar year. This will be beneficial to the entity in moving their privacy programs forward.

		Governance		
Practice	Implemented	Current Maturity	Strategies for Improvement	Target Maturity
Gov-1. Chief Administrative Officer (CAO) Designation	☐ Yes ☐ No	Level 0 ·	Example Strategy: Adopt policy or ordinance formally adopting this practice and defines who will make CAO designation and how that designation will be made.	Level 0 ·
Gov-2. Records Officers Appointment	☐ Yes ☐ No	Level 0 ·	Example Strategy: Adopt policy or ordinance formally adopting this practice and defines how the CAO will appoint records officers and review appointments.	Level 0 ·
Gov-3. Records Officer Training and Certification	☐ Yes ☐ No	Level 0 ·	Example Strategy: Adopt policy or ordinance formally adopting this practice and require records officers complete certification.	Level 0 •

Gov-4. Statewide Privacy Awareness Training	☐ Yes ☐ No	Level 0 •		Level 0 •
Gov-5. Privacy Program Report	☐ Yes ☐ No	Level 0 -		Level 0 •
		Identify		
Practice	Implemented	Current Maturity	Strategies for Improvement	Target Maturity
Ide-1. Record Series Creation and Maintenance	☐ Yes ☐ No	Level 0 ·		Level 0 •
Ide-2. Record Series Designation and Classification	☐ Yes ☐ No	Level 0 ·		Level 0 •
Ide-3. Retention Schedule Proposal and Approval	☐ Yes ☐ No	Level 0 •		Level 0 •
Ide-4. Record Series Privacy Annotation	☐ Yes ☐ No	Level 0 ·		Level 0 •
Ide-5. Inventorying	☐ Yes	Level 0	Example strategy: Adopt policy or	Level 0 ·

Level 0 •

☐ No

☐ Yes ☐ No

Ide-6. Privacy Impact Assessment

Level 0 •

ordinance that formally adopts

this practice.

Ide-7. Record and Data Sharing, Selling, or Purchasing	☐ Yes ☐ No		Example Strategy: Adopt policy or ordinance requiring any sharing, selling or purchasing of data be reported and inventoried.	Level 0 ·
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Control				
Practice	Implemented	Current Maturity	Strategies for Improvement	Target Maturity
Con-1. Data Subject Requests for Access	☐ Yes ☐ No	Level 0 -		Level 0 •
Con-2. Data Subject Requests for Amendment or Correction	☐ Yes ☐ No	Level 0 -		Level 0 •
Con-3. Data Subject Requests for an Explanation	☐ Yes ☐ No	Level 0 -		Level 0 ·
Con-4. Data Subject Request At-Risk Employee Restrictions	☐ Yes ☐ No	Level 0 -		Level 0 ·

Communicate				
Practice Implemented		Current Maturity	Strategies for Improvement	Target Maturity
Com-1. Website Privacy Notice (Policy)	☐ Yes ☐ No	Level 0 •		Level 0 •

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Protect				
Practice	Implemented	Current Maturity	Strategies for Improvement	Target Maturity
Pro-1. Minimum Data Necessary	☐ Yes ☐ No	Level 0 ·		Level 0 •
Pro-2. Record Retention and Disposition	☐ Yes ☐ No	Level 0 ·		Level 0 •
Pro-3. Incident Response	☐ Yes ☐ No	Level 0 ·		Level 0 •
Pro-4. Breach Notification	☐ Yes ☐ No	Level 0 ·		Level 0 ·

Other Privacy Practices Implemented by the Governmental Entity				
Practice	Implemented	Current Maturity	Strategies for Improvement	Target Maturity
	☐ Yes ☐ No	Level 0		Level 0
	☐ Yes ☐ No	Level 0		Level 0

Section 4: High-Risk Processing Activities

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

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

Definition – Utah Code § 63A-19-101(17)(a) and (b):

- (a) "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.
- (b) 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 High-Risk Activities:

Select all applicable high-risk processing activities your entity engages in and provide a brief description of the purposes and uses of each activity.
☐ 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 requirements of Subsections 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, and the types of, personal data that your governmental entity shares, sells, or purchases and provide a summary of the legal basis for the sharing, selling, or purchasing.

Types of Personal Data	Share, Sell and Purchase Status	Legal Basis for Sharing, Selling or Purchasing
Basic Identification & Contact Information Full Name Date of Birth Place of Birth Gender Age Government-Issued Identifiers: Social Security Number Driver's License or State ID Number Passport Number Passport Number Other national or government-assigned IDs Contact Information: Home Address Email Address(es) Phone Number(s)	☐ Share ☐ Sell ☐ Purchase ☐ N/A	

 Mailing Address (if different from home address) 		
Demographic & Personal Characteristics • Race or Ethnicity	☐ Share	
 Marital Status Nationality or Citizenship 	☐ Sell	
 Language Preferences Household Information 	☐ Purchase	
Household SizeHousehold Composition	□ N/A	
Employment & Professional Information • Job Title and Position	☐ Share	
 Employment History Employer Name 	☐ Sell	
Professional Credentials Professional Licenses	☐ Purchase	
CertificationsWork Contact Information	□ N/A	
Financial Data	Share	
Banking Details Sank Account Numbers Credit Card Numbers	☐ Sell	
Tax Identification Numbers Income and Wage Data	☐ Purchase	
 Credit Information Credit Reports Credit Scores Payment History 	□ N/A	
Health and Medical Information	☐ Share	
 Medical History Diagnoses or Treatments Mental Health Data 	☐ Sell	
Health Insurance Information	☐ Purchase	

Prescription InformationDisability Status	□ N/A	
Education Information	☐ Share	
 School or Institution Attended Student ID Numbers Academic Records 	☐ Sell	
GradesTranscripts	☐ Purchase	
 Special Education Status Disciplinary Records 	□ N/A	
Government Program & Benefits Data	☐ Share	
 Program Participation (e.g., SNAP, Medicaid, TANF) Eligibility Determinations 	☐ Sell	
Benefit Amounts or DisbursementsCase Management Notes	☐ Purchase	
Appeals/Decisions	□ N/A	
Biometric Data • Physical Biometrics	☐ Share	
Fingerprints Facial Recognition Data	☐ Sell	
Retina or Iris Scans Voiceprints	☐ Purchase	
Genetic Information: DNA or other genetic data	□ N/A	
Online & Digital Identifiers • Network Identifiers	☐ Share	
Network Identifiers IP Addresses Device IDs	☐ Sell	
Tracking Technologies Cookies	☐ Purchase	
Browser Fingerprints Location Data (e.g., GPS, precise)	□ N/A	

geolocation) • Login Credentials (e.g., usernames, hashed passwords) • Online Activity Logs • Social Media Handles		
Criminal or Legal Information	☐ Share	
 Arrest Records Conviction History Court Records 	☐ Sell	
 Court Records Probation or Parole Status Incarceration Records 	☐ Purchase	
Thearest ation records	□ N/A	
Vehicle & Property Data	☐ Share	
 Vehicle Information Vehicle Registration VIN Numbers 	☐ Sell	
Property Ownership Property Ownership or Deed	☐ Purchase	
Information • Property Tax Records	□ N/A	
Utility Usage Data		
Photographic or Video Data • Surveillance Footage	☐ Share	
 Government ID Photos School or Agency-Provided Photo Records 	☐ Sell	
 Body Camera Footage Public Meeting Recordings 	☐ Purchase	
T do no nicoting recovering	□ N/A	
Voting & Civic Data • Voter Registration	☐ Share	
 Voter Registration Voting History Political District Assignments 	☐ Sell	

Civic Engagement Program Data	☐ Purchase	
	□ N/A	
Immigration & Travel Information	☐ Share	
 Visa Status Travel History or Itineraries Customs Declarations 	☐ Sell	
Immigration Proceedings	☐ Purchase	
	□ N/A	
Communication & Complaints Data	☐ Share	
 Correspondence Emails or Written Correspondence Call Transcripts or Recordings 	☐ Sell	
Case Notes related to complaints or service requests	☐ Purchase	
requests	□ N/A	
Other	Share	
Explain:	☐ Sell	
	☐ Purchase	
	□ N/A	

5.2 Personal Data Recipients and Sources

 $Fulfills\ requirements\ of\ Subsections\ 63A-19-401.3(1)(e)(i),\ (ii),\ and\ (iii):$

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

Mark all that apply:

Processing Activity	Categories of Recipients or Sources
Personal Data Shared With:	Governmental and Public Sector Entities I. Domestic Governmental Entities: State, Local, Federal, or Tribal Governmental Entities Law Enforcement Agencies Judicial or Court Systems Legislative Bodies or Policy Research Organizations Regulatory Agencies Professional Licensing Boards II. International Governmental Entities: Foreign Governments or International Organizations Public Services & Emergency: Emergency Services / Disaster Response Agencies Public Utilities or Infrastructure Partners III. Public Disclosure: Public Disclosure / Open Records Releases Commercial and Private Sector Entities I. Service Providers & Vendors: Third-Party Service Providers / Contractors / Vendors Cloud Service Providers / Hosting Platforms Technology Integrators or Software Developers II. Data & Marketing: Private Sector / Commercial Companies

	□ Data Brokers / Aggregators □ Social Media Platforms III. Financial & Insurance: □ Credit Bureaus or Financial Institutions □ Insurance Providers IV. Healthcare: □ Healthcare Providers or Health Information Exchanges V. Media: □ Media or News Organizations Research, Education, and Nonprofit Entities
	Research Institutions / Universities Educational Institutions Nonprofit Organizations Non-Governmental Watchdogs / Advocacy Groups Individuals and Oversight Individuals (e.g., data subjects or their authorized representatives) Auditors / Oversight Bodies Other/Not Applicable (N/A) Other (Specify as needed) N/A (Indicate if no data is shared with or received from any of these categories)
Personal Data Sold To:	Governmental and Public Sector Entities I. Domestic Governmental Entities: State, Local, Federal, or Tribal Governmental Entities Law Enforcement Agencies Judicial or Court Systems Legislative Bodies or Policy Research Organizations Regulatory Agencies Professional Licensing Boards II. International Governmental Entities: Foreign Governments or International Organizations Public Services & Emergency:

☐ Emergency Services / Disaster Response Agencies
Public Utilities or Infrastructure Partners
III. Public Disclosure:
☐ Public Disclosure / Open Records Releases
Commercial and Private Sector Entities
I. Service Providers & Vendors:
☐ Third-Party Service Providers / Contractors / Vendors
☐ Cloud Service Providers / Hosting Platforms
☐ Technology Integrators or Software Developers
II. Data & Marketing:
☐ Private Sector / Commercial Companies
☐ Data Brokers / Aggregators
☐ Social Media Platforms
III. Financial & Insurance:
☐ Credit Bureaus or Financial Institutions
☐ Insurance Providers
IV. Healthcare:
☐ Healthcare Providers or Health Information Exchanges
V. Media:
☐ Media or News Organizations
Research, Education, and Nonprofit Entities
Research Institutions / Universities
☐ Educational Institutions
□ Nonprofit Organizations
☐ Non-Governmental Watchdogs / Advocacy Groups
Individuals and Oversight
☐ Individuals (e.g., data subjects or their authorized representatives)
☐ Auditors / Oversight Bodies
Other/Not Applicable (N/A)
☐ Other (Specify as needed)
☐ N/A (Indicate if no data is shared with or received from any of these categories)

Personal Data Purchased From:	Governmental and Public Sector Entities
	I. Domestic Governmental Entities:
	☐ State, Local, Federal, or Tribal Governmental Entities
	Law Enforcement Agencies
	☐ Judicial or Court Systems
	Legislative Bodies or Policy Research Organizations
	Regulatory Agencies
	☐ Professional Licensing Boards
	II. International Governmental Entities:
	☐ Foreign Governments or International Organizations
	☐ Public Services & Emergency:
	☐ Emergency Services / Disaster Response Agencies
	☐ Public Utilities or Infrastructure Partners
	III. Public Disclosure:
	☐ Public Disclosure / Open Records Releases
	Commercial and Private Sector Entities
	I. Service Providers & Vendors:
	☐ Third-Party Service Providers / Contractors / Vendors
	☐ Cloud Service Providers / Hosting Platforms
	☐ Technology Integrators or Software Developers
	II. Data & Marketing:
	☐ Private Sector / Commercial Companies
	☐ Data Brokers / Aggregators
	☐ Social Media Platforms
	III. Financial & Insurance:
	☐ Credit Bureaus or Financial Institutions
	☐ Insurance Providers
	IV. Healthcare:
	☐ Healthcare Providers or Health Information Exchanges
	V. Media:
	☐ Media or News Organizations
	Research, Education, and Nonprofit Entities

 □ Research Institutions / Universities □ Educational Institutions □ Nonprofit Organizations □ Non-Governmental Watchdogs / Advocacy Groups Individuals and Oversight □ Individuals (e.g., data subjects or their authorized representatives) □ Auditors / Oversight Bodies Other/Not Applicable (N/A) □ Other (Specify as needed)
☐ Other (Specify as needed)☐ N/A (Indicate if no data is shared with or received from any of these categories)

Section 6: Privacy Training Completion

Fulfills requirement of Subsection 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 have completed the required privacy training requirements described in Section 63A-19-401.2?

Enter %		

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

Fulfills requirement of Subsections 63A-19-401(2)(a)(iv)(D) and 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	pursuant	to	Utah	Code	8
63A-19	9-401	(2)(a)(iv)?									

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 \square 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.

I, the undersigned, certify that the information provided in this report is accurate to the best of my knowledge.

Name:	
Signature:	
Date·	