

PRIVACY OVERVIEW FOR HUNTING AND FISHING LICENSE DATABASE



OVERVIEW

- Program/Data Governance
- Introduction to CDA (Customer Database Application)
- Legal Basis
- Purpose & uses of CDA
- Record series
- Tracking access & use
- CDA use & sharing
- Registration authentication
- Data encryption
- Data retention
- Data subjects



PROGRAM GOVERNANCE

- Kenny Johnson Administrative Chief
- Jamie Martell Records Officer
- Greg Evans DTS Manager
- Lindy Varney Licensing Coordinator
- Phil Gray Licensing Coordinator



CUSTOMER DATABASE APPLICATION

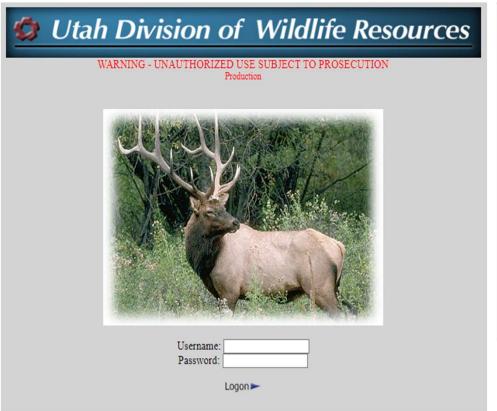
- Created to store license data electronically in 2001. (license purchase history)
- Helps maintain license eligibility standards by displaying sales to eligible customers. (Education, Age, OIAL, LE, ORS arrears etc.)
- Name, DOB, address, ID traits, Cust ID, SSN (not required or viewable)
- 1M licenses annually, 504 unique license types, available by eligibility.



ACCESS

- The database contains PII for about 3.8M unique customers.
- Access is restricted to a limited number of internal staff to carry out state business, and serve customers: 171 DWR Law Enforcement & front counter staff, 24 license admins & 5 sys admins.
- Only accessible on state network, or through state VPN
- Login required
- Some information is exchanged with other state entities (ORS for child support in arrears, Violator Compact (record by record basis)
- No direct external access to database

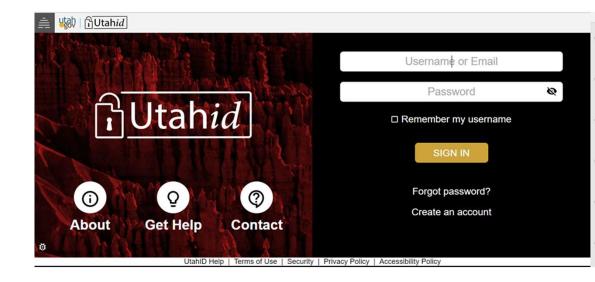
INTERFACE





REGISTRATION AUTHENTICATION

- Utah ID with multi factor authentication
- 90 day password reset



LEGAL BASIS

• 23A-4-201 Licenses and permits required to participate in hunting and fishing.



RECORD SERIES

- Record series: 8600
- Current designation: Public for license type, name, home address
- Secondary designation: Private for telephone number, date of birth, drivers license number, physical description, SSN, hunter ed number.
- Retention Schedule: 3 years for paper copies sold at license vendors and division offices.
- Work to adjust retention to match internal data needs.
- Work with legislature to make records private.

TRACKING ACCESS & USE

CDA System Records:

- Role Based Access Control
- Login date/time
- Clerk initials
- Track data edits

CDA USE & SHARING

- Internal staff to assist customers
- Customer education management
- Law Enforcement to verify eligibility in the field, investigations, etc.
- The Office of Recovery Services for skip efforts and blocking parents in arrears on child support.

DATA SECURITY

- System follows enterprise data security policies.
- Data is encrypted at rest and in transit.
- Backup and recovery.
- Firewall.

Policies:

Information Security Policy



DATA RETENTION

- DWR is beginning the process to re-evaluate and propose new retention schedules for electronic records.
- These updates will allow us to modernize and right size retention schedules.

TRANSPARENCY

- Data is stored for citizens who buy hunting and fishing licenses and complete various education courses.
- Direct ability for customers to access/update their own data in real time.
- Links provided to State Privacy Policy at POS: https://www.utah.gov/support/privacypolicy.html

EXISTING PRIVACY FINDINGS/PLAN OF ACTION & MILESTONES

- Completed CPO Privacy Assessment March of 2023
- Work with State Archives to modernize our record series and right size retention schedules.
- Work with State Legislature to classify hunting and fishing records as private.
- Work internally to update the newly required data collection privacy notice at point of collection.

