

## ORDINANCE 2025-19

### AN ORDINANCE TO INITIATE THE ESTABLISHMENT OF THE CITY OF MOAB DATA PRIVACY PROGRAM; DESIGNATE CHIEF ADMINISTRATIVE AND AUTHORIZED RECORDS OFFICERS; REQUIRE RECORDS FOR PROOF OF OFFICER AND EMPLOYEE PRIVACY TRAINING; PREPARE WEBSITE DATA PRIVACY NOTICE; ENDORSE THE STATE OF UTAH'S DATA PRIVACY POLICY; AND COMPLETE CITY OF MOAB INTERNAL DATA PRIVACY PROGRAM REPORT

**WHEREAS**, the Moab City Council (“**Council**”) adopts programs to guide decision-making and policy; and

**WHEREAS**, the State of Utah requires each governmental entity, including the City of Moab (“**Moab**”), to initiate a data privacy program (“**DPP**”) that recognizes the state policy that “an individual has a fundamental interest in and inherent expectation of privacy regarding the individual’s personal data that an individual provides to a governmental entity” and each governmental entity shall process personal data consistent with this state policy pursuant to Utah Code § 63A-19-401; and

**WHEREAS**, the Utah State Legislature enacted HB 444, Data Privacy Amendments, in 2025, which requires Moab to prepare an internal DPP report (“**Report**”) no later than December 31, 2025, pursuant to Utah Code Ann. § 63A-19-401.3; and

**WHEREAS**, the Council resolves to fully comply with the requirements of Utah Code, Title 63A, Chapter 19, Government Data Privacy Act (“**GDPA**”); Utah Code, Title 63G, Chapter 2, Government Records Access and Management Act (“**GRAMA**”); and Utah Government Operations Code, Title 63A; including the completion of the Report; and

**WHEREAS**, the Council desires to initiate and establish an official Moab DPP to be developed and implemented over time to comply with the requirements of Utah Code, Title 63A, Chapter 19, Part 4, Duties of Governmental Entities, and other applicable laws; and

**WHEREAS**, the Council desires to appoint a Chief Administrative Officer (“**CAO**”) and an administrative records officer (“**ARO**”) for the City’s DPP.

**NOW, THEREFORE BE IT ORDAINED** by the Moab City Council that:

1. Approval of Forms: The Council approves the following forms:
  - a. The internal privacy report form template included as **Exhibit A** of this Ordinance; and
  - b. The website data privacy statement attached as **Exhibit B** of this Ordinance.

2. Appointment of CAO: The Council designates Sommar Johnson, City Recorder, as the CAO of Moab DPP and directs the CAO to:

- a. Obtain all required training(s); and
- b. Oversee the compliance of all Moab staff and applicable agents with the data privacy training pursuant to Utah Code § 63A-19-401.2; and
- c. Report the names of the designated CAO and ARO to the Division of Archives and Records Services pursuant to Utah Code Subsections 63A-12-103(8)(c)(ii) and 63G-2-108; and
- d. Prepare the Report to the best of the CAO's ability using the template attached as Exhibit A in accordance with applicable law and to file the completed report in Moab records, provided that such report will be a protected record; and
- e. Prepare the website data privacy statement in a manner that is substantially similar to the notice template attached as Exhibit B and publish the completed statement to the City of Moab official website and the Utah Public Notice Website.

3. Appointment of ARO: The Council designates Sommar Johnson, City Recorder, as the ARO of Moab DPP to fulfill all duties under applicable law and Moab ordinances and directs the ARO to take all required training(s).

4. Endorsement: The Council endorses the State of Utah's data privacy policy.

5. Enactment of DPP: The Council approves:

- a. The initiation and establishment of the [] DPP, with direction to the Mayor and staff to and present to the Council for approval at a later date such other ordinances, rules, or policies needed to implement the DPP and to comply with applicable law; and
- b. The designation of the CAO and appointment of the ARO, the intended recordkeeping for proof of completion of ARO training and certification and employee privacy training; and
- c. The preparation and publication of the website data privacy notice; and
- d. The completion of the Report.

6. Additional Direction to Mayor and Staff: The Mayor and staff are authorized and directed to take such other steps as may be needed:

a. For this Ordinance to become effective under Utah law; and

b. To make any non-substantive edits to correct any scrivener's, formatting, and numbering errors that may be needed, if any, to this Ordinance.

7. Severability: If a court of competent jurisdiction determines that any part of this Ordinance is unconstitutional or invalid, then such portion of this Ordinance, or specific application of this Ordinance, shall be severed from the remainder, which shall continue in full force and effect.

8. Effective Date: This Ordinance will go into effect immediately.

[execution on following page]

ADOPTED AND APPROVED at a duly called meeting of the Moab City Council  
on this 9th day of December 2025.

CITY OF MOAB

  
By: Joette Langianese, Mayor

ATTEST:

  
Sommar Johnson, City Recorder

*(Complete as Applicable)*

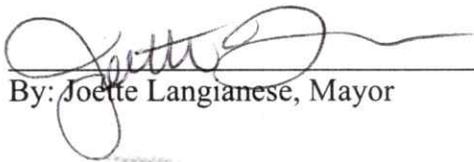
Date ordinance summary was published on the Utah Public Notice Website per Utah Code §10-3-711: DECEMBER 11, 2025

Effective date of ordinance: DECEMBER 11, 2025

**SUMMARY OF  
CITY OF MOAB  
ORDINANCE NO. 2025-19**

On December 9, 2025, the Moab Council enacted Ordinance No. 2025-19 to: (1) establish a data privacy program per H.B. 444; (2) designate chief administrative and authorized records officers; (3) require records for proof of officer and employee privacy training; (4) prepare a website data privacy notice; (5) endorse the State of Utah's data privacy policy; and (6) complete an initial data privacy program report.

CITY OF MOAB

  
By: Joette Langianese, Mayor

ATTEST:

  
Sommar Johnson, City Recorder

Voting:

Council member Myers voting	AYE
Council member Topper voting	AYE
Council member Knuteson-Boyd voting	AYE
Council member Taylor voting	AYE
Council member Wojciechowski voting	AYE

A complete copy of Ordinance No. 2025-19 is available in the office of the Moab City Recorder, 217 East Center Street, Moab, UT 84532.

**EXHIBIT A**

**CITY OF MOAB TEMPLATE DATA PRIVACY PROGRAM REPORT**

**Section 1: Governmental Entity Information**

**Governmental Entity Name: Moab City**

**Governmental Entity Type (Select One):**

- |   |  |
|---|--|
| <input type="checkbox"/> State Agency             | <input type="checkbox"/> Interlocal                      |
| <input type="checkbox"/> County                   | <input type="checkbox"/> Associations of Government      |
| <input type="checkbox"/> Municipality             | <input type="checkbox"/> Charter School                  |
| <input type="checkbox"/> Special Service District | <input type="checkbox"/> Public School                   |
| <input type="checkbox"/> Board or Commission      | <input type="checkbox"/> Independent or Quasi-Government |
| <input type="checkbox"/> College or University    | <input type="checkbox"/> Other _____                     |

**Mailing Address:**

\_\_\_\_\_

**Chief Administrative Officer (CAO):**

- **Name:** \_\_\_\_\_
- **Title:** \_\_\_\_\_
- **Email:** \_\_\_\_\_
- **Phone:** \_\_\_\_\_
- **Date of Report Completion:** \_\_\_\_\_

**Section 2: Privacy Program Status**

*Utah Code Ann. Subsection 63A-19-401.3(1)(a):*

- **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
- Resolution
- Policy
- Privacy Program Report

Other: \_\_\_\_\_

### Section 3: Privacy Practices, Maturity and Strategies

*Utah Code Ann. Subsections 63A-19-401.3(1)(b)(i) and (ii):*

#### Privacy Practice Maturity Model:

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, 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	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0	<i>Example Strategy:</i> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0	<i>Example Strategy:</i> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0	<i>Example Strategy:</i> Adopt policy or ordinance formally adopting this practice and require records	Level 0

			officers complete certification.	
Gov-4. Statewide Privacy Awareness Training	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0
Gov-5. Privacy Program Report	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0

<b>Identify</b>				
<b>Practice</b>	<b>Implemented</b>	<b>Current Maturity</b>	<b>Strategies for Improvement</b>	<b>Target Maturity</b>
Ide-1. Record Series Creation and Maintenance	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0
Ide-2. Record Series Designation and Classification	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0
Ide-3. Retention Schedule Proposal and Approval	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0
Ide-4. Record Series Privacy Annotation	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0

Ide-5. Inventorying	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0	<i>Example strategy:</i> Adopt policy or ordinance that formally adopts this practice.	Level 0
Ide-6. Privacy Impact Assessment	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0
Ide-7. Record and Data Sharing, Selling, or Purchasing	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0	<i>Example Strategy:</i> Adopt policy or ordinance requiring any sharing, selling or purchasing of data be reported and inventoried.	Level 0

<b>Control</b>				
<b>Practice</b>	<b>Implemented</b>	<b>Current Maturity</b>	<b>Strategies for Improvement</b>	<b>Target Maturity</b>
Con-1. Data Subject Requests for Access	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0
Con-2. Data Subject Requests for Amendment or Correction	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0
Con-3. Data Subject Requests for an Explanation	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0

Con-4. Data Subject Request At-Risk Employee Restrictions	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0
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### Communicate

Practice	Implemented	Current Maturity	Strategies for Improvement	Target Maturity
Com-1. Website Privacy Notice (Policy)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0
Com-2. Privacy Notice (Notice to Provider of Information)	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0

### Protect

Practice	Implemented	Current Maturity	Strategies for Improvement	Target Maturity
Pro-1. Minimum Data Necessary	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0
Pro-2. Record Retention and Disposition	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0
Pro-3. Incident Response	<input type="checkbox"/> Yes	Level 0		Level 0

	<input type="checkbox"/> No			
Pro-4. Breach Notification	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0

Other Privacy Practices Implemented by the Governmental Entity				
Practice	Implemented	Current Maturity	Strategies for Improvement	Target Maturity
	<input type="checkbox"/> Yes <input type="checkbox"/> No	Level 0		Level 0
	<input type="checkbox"/> Yes <input type="checkbox"/> 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:

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**Automated decision making**

Explanation of Purpose:

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**Profiling (e.g., behavioral or predictive analysis)**

Explanation of Purpose:

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**Genetic data processing**

Explanation of Purpose:

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**Biometric data processing (e.g., fingerprints, voice, iris scans)**

Explanation of Purpose:

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**Geolocation data processing**

Explanation of Purpose:

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**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]

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**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.

<b>Types of Personal Data</b>	<b>Share, Sell and Purchase Status</b>	<b>Legal Basis for Sharing, Selling or Purchasing</b>
<b>Basic Identification &amp; Contact Information</b> <ul style="list-style-type: none"><li>● Full Name</li><li>● Date of Birth</li><li>● Place of Birth</li><li>● Gender</li><li>● Age</li></ul>	<input type="checkbox"/> Share  <input type="checkbox"/> Sell	

<ul style="list-style-type: none"> <li>● <b>Government-Issued Identifiers:</b> <ul style="list-style-type: none"> <li>○ Social Security Number</li> <li>○ Driver's License or State ID Number</li> <li>○ Passport Number</li> <li>○ Other national or government-assigned IDs</li> </ul> </li> <li>● <b>Contact Information:</b> <ul style="list-style-type: none"> <li>○ Home Address</li> <li>○ Email Address(es)</li> <li>○ Phone Number(s)</li> <li>○ Mailing Address (if different from home address)</li> </ul> </li> </ul>	<input type="checkbox"/> Purchase  <input type="checkbox"/> N/A	
<ul style="list-style-type: none"> <li>● <b>Demographic &amp; Personal Characteristics</b></li> <li>● Race or Ethnicity</li> <li>● Marital Status</li> <li>● Nationality or Citizenship</li> <li>● Language Preferences</li> <li>● Household Information <ul style="list-style-type: none"> <li>○ Household Size</li> <li>○ Household Composition</li> </ul> </li> </ul>	<input type="checkbox"/> Share  <input type="checkbox"/> Sell  <input type="checkbox"/> Purchase  <input type="checkbox"/> N/A	

<ul style="list-style-type: none"> <li>● <b>Employment &amp; Professional Information</b></li> <li>● Job Title and Position</li> <li>● Employment History</li> <li>● Employer Name</li> <li>● Professional Credentials <ul style="list-style-type: none"> <li>○ Professional Licenses</li> <li>○ Certifications</li> </ul> </li> <li>● Work Contact Information</li> </ul>	<input type="checkbox"/> Share  <input type="checkbox"/> Sell  <input type="checkbox"/> Purchase  <input type="checkbox"/> N/A	
<ul style="list-style-type: none"> <li>● <b>Financial Data</b></li> <li>● Banking Details <ul style="list-style-type: none"> <li>○ Bank Account Numbers</li> <li>○ Credit Card Numbers</li> </ul> </li> <li>● Tax Identification Numbers</li> <li>● Income and Wage Data</li> <li>● Credit Information <ul style="list-style-type: none"> <li>○ Credit Reports</li> <li>○ Credit Scores</li> </ul> </li> <li>● Payment History</li> </ul>	<input type="checkbox"/> Share  <input type="checkbox"/> Sell  <input type="checkbox"/> Purchase  <input type="checkbox"/> N/A	
<ul style="list-style-type: none"> <li>● <b>Health and Medical Information</b></li> </ul>	<input type="checkbox"/> Share	

<ul style="list-style-type: none"> <li>● Medical History</li> <li>● Diagnoses or Treatments</li> <li>● Mental Health Data</li> <li>● Health Insurance Information</li> <li>● Prescription Information</li> <li>● Disability Status</li> </ul>	<p style="text-align: center;"><input type="checkbox"/> Sell</p> <p style="text-align: center;"><input type="checkbox"/> Purchase</p> <p style="text-align: center;"><input type="checkbox"/> N/A</p>	
<ul style="list-style-type: none"> <li>● <b>Education Information</b></li> <li>● School or Institution Attended</li> <li>● Student ID Numbers</li> <li>● Academic Records <ul style="list-style-type: none"> <li>○ Grades</li> <li>○ Transcripts</li> </ul> </li> <li>● Special Education Status</li> <li>● Disciplinary Records</li> </ul>	<p style="text-align: center;"><input type="checkbox"/> Share</p> <p style="text-align: center;"><input type="checkbox"/> Sell</p> <p style="text-align: center;"><input type="checkbox"/> Purchase</p> <p style="text-align: center;"><input type="checkbox"/> N/A</p>	
<ul style="list-style-type: none"> <li>● <b>Government Program &amp; Benefits Data</b></li> <li>● Program Participation (e.g., SNAP, Medicaid, TANF)</li> <li>● Eligibility Determinations</li> <li>● Benefit Amounts or Disbursements</li> <li>● Case Management Notes</li> </ul>	<p style="text-align: center;"><input type="checkbox"/> Share</p> <p style="text-align: center;"><input type="checkbox"/> Sell</p> <p style="text-align: center;"><input type="checkbox"/> Purchase</p>	

<ul style="list-style-type: none"> <li>● Appeals/Decisions</li> </ul>	<input type="checkbox"/> N/A	
<ul style="list-style-type: none"> <li>● <b>Biometric Data</b></li> <li>● Physical Biometrics <ul style="list-style-type: none"> <li>○ Fingerprints</li> <li>○ Facial Recognition Data</li> <li>○ Retina or Iris Scans</li> </ul> </li> <li>● Voiceprints</li> <li>● Genetic Information: DNA or other genetic data</li> </ul>	<input type="checkbox"/> Share  <input type="checkbox"/> Sell  <input type="checkbox"/> Purchase  <input type="checkbox"/> N/A	
<ul style="list-style-type: none"> <li>● <b>Online &amp; Digital Identifiers</b></li> <li>● Network Identifiers <ul style="list-style-type: none"> <li>○ IP Addresses</li> <li>○ Device IDs</li> </ul> </li> <li>● Tracking Technologies <ul style="list-style-type: none"> <li>○ Cookies</li> <li>○ Browser Fingerprints</li> </ul> </li> <li>● Location Data (e.g., GPS, precise geolocation)</li> <li>● Login Credentials (e.g., usernames, hashed passwords)</li> <li>● Online Activity Logs</li> </ul>	<input type="checkbox"/> Share  <input type="checkbox"/> Sell  <input type="checkbox"/> Purchase  <input type="checkbox"/> N/A	

<ul style="list-style-type: none"> <li>● Social Media Handles</li> </ul>		
<ul style="list-style-type: none"> <li>● <b>Criminal or Legal Information</b></li> <li>● Arrest Records</li> <li>● Conviction History</li> <li>● Court Records</li> <li>● Probation or Parole Status</li> <li>● Incarceration Records</li> </ul>	<input type="checkbox"/> Share  <input type="checkbox"/> Sell  <input type="checkbox"/> Purchase  <input type="checkbox"/> N/A	
<ul style="list-style-type: none"> <li>● <b>Vehicle &amp; Property Data</b></li> <li>● Vehicle Information <ul style="list-style-type: none"> <li>○ Vehicle Registration</li> <li>○ VIN Numbers</li> </ul> </li> <li>● Property Ownership <ul style="list-style-type: none"> <li>○ Property Ownership or Deed Information</li> <li>○ Property Tax Records</li> </ul> </li> <li>● Utility Usage Data</li> </ul>	<input type="checkbox"/> Share  <input type="checkbox"/> Sell  <input type="checkbox"/> Purchase  <input type="checkbox"/> N/A	
<ul style="list-style-type: none"> <li>● <b>Photographic or Video Data</b></li> <li>● Surveillance Footage</li> </ul>	<input type="checkbox"/> Share  <input type="checkbox"/> Sell	

<ul style="list-style-type: none"> <li>● Government ID Photos</li> <li>● School or Agency- Provided Photo Records</li> <li>● Body Camera Footage</li> <li>● Public Meeting Recordings</li> </ul>	<input type="checkbox"/> Purchase  <input type="checkbox"/> N/A	
<ul style="list-style-type: none"> <li>● <b>Voting &amp; Civic Data</b></li> <li>● Voter Registration</li> <li>● Voting History</li> <li>● Political District Assignments</li> <li>● Civic Engagement Program Data</li> </ul>	<input type="checkbox"/> Share  <input type="checkbox"/> Sell  <input type="checkbox"/> Purchase  <input type="checkbox"/> N/A	
<ul style="list-style-type: none"> <li>● <b>Immigration &amp; Travel Information</b></li> <li>● Visa Status</li> <li>● Travel History or Itineraries</li> <li>● Customs Declarations</li> <li>● Immigration Proceedings</li> </ul>	<input type="checkbox"/> Share  <input type="checkbox"/> Sell  <input type="checkbox"/> Purchase  <input type="checkbox"/> N/A	
<ul style="list-style-type: none"> <li>● <b>Communication &amp; Complaints Data</b></li> </ul>	<input type="checkbox"/> Share	

<ul style="list-style-type: none"> <li>● Correspondence <ul style="list-style-type: none"> <li>○ Emails or Written Correspondence</li> <li>○ Call Transcripts or Recordings</li> </ul> </li> <li>● Case Notes related to complaints or service requests</li> <li>●</li> </ul>	<input type="checkbox"/> Sell  <input type="checkbox"/> Purchase  <input type="checkbox"/> N/A	
<ul style="list-style-type: none"> <li>● Other</li> </ul> <p>Explain:</p> <hr/>	<input type="checkbox"/> Share  <input type="checkbox"/> Sell  <input type="checkbox"/> Purchase  <input type="checkbox"/> 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:	<p><b>Governmental and Public Sector Entities</b></p> <p>I. Domestic Governmental Entities:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> State, Local, Federal, or Tribal Governmental Entities</li> <li><input type="checkbox"/> Law Enforcement Agencies</li> <li><input type="checkbox"/> Judicial or Court Systems</li> <li><input type="checkbox"/> Legislative Bodies or Policy Research Organizations</li> <li><input type="checkbox"/> Regulatory Agencies</li> <li><input type="checkbox"/> Professional Licensing Boards</li> </ul> <p>II. International Governmental Entities:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Foreign Governments or International Organizations</li> <li><input type="checkbox"/> Public Services &amp; Emergency:               <ul style="list-style-type: none"> <li><input type="checkbox"/> Emergency Services / Disaster Response Agencies</li> <li><input type="checkbox"/> Public Utilities or Infrastructure Partners</li> </ul> </li> </ul> <p>III. Public Disclosure:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Public Disclosure / Open Records Releases</li> </ul> <p><b>Commercial and Private Sector Entities</b></p> <p>I. Service Providers &amp; Vendors:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Third-Party Service Providers / Contractors / Vendors</li> <li><input type="checkbox"/> Cloud Service Providers / Hosting Platforms</li> <li><input type="checkbox"/> Technology Integrators or Software Developers</li> </ul>

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)

	<input type="checkbox"/> N/A (Indicate if no data is shared with or received from any of these categories)
<b>Personal Data Sold To:</b>	<p><b>Governmental and Public Sector Entities</b></p> <p>I. Domestic Governmental Entities:</p> <p><input type="checkbox"/> State, Local, Federal, or Tribal Governmental Entities</p> <p><input type="checkbox"/> Law Enforcement Agencies</p> <p><input type="checkbox"/> Judicial or Court Systems</p> <p><input type="checkbox"/> Legislative Bodies or Policy Research Organizations</p> <p><input type="checkbox"/> Regulatory Agencies</p> <p><input type="checkbox"/> Professional Licensing Boards</p> <p>II. International Governmental Entities:</p> <p><input type="checkbox"/> Foreign Governments or International Organizations</p> <p><input type="checkbox"/> Public Services &amp; Emergency:</p> <p><input type="checkbox"/> Emergency Services / Disaster Response Agencies</p> <p><input type="checkbox"/> Public Utilities or Infrastructure Partners</p> <p>III. Public Disclosure:</p> <p><input type="checkbox"/> Public Disclosure / Open Records Releases</p> <p><b>Commercial and Private Sector Entities</b></p> <p>I. Service Providers &amp; Vendors:</p> <p><input type="checkbox"/> Third-Party Service Providers / Contractors / Vendors</p> <p><input type="checkbox"/> Cloud Service Providers / Hosting Platforms</p> <p><input type="checkbox"/> Technology Integrators or Software Developers</p>

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)

	<input type="checkbox"/> N/A (Indicate if no data is shared with or received from any of these categories)
Personal Data Purchased From:	<p><b>Governmental and Public Sector Entities</b></p> <p>I. Domestic Governmental Entities:</p> <input type="checkbox"/> State, Local, Federal, or Tribal Governmental Entities <input type="checkbox"/> Law Enforcement Agencies <input type="checkbox"/> Judicial or Court Systems <input type="checkbox"/> Legislative Bodies or Policy Research Organizations <input type="checkbox"/> Regulatory Agencies <input type="checkbox"/> Professional Licensing Boards <p>II. International Governmental Entities:</p> <input type="checkbox"/> Foreign Governments or International Organizations <input type="checkbox"/> Public Services & Emergency: <input type="checkbox"/> Emergency Services / Disaster Response Agencies <input type="checkbox"/> Public Utilities or Infrastructure Partners <p>III. Public Disclosure:</p> <input type="checkbox"/> Public Disclosure / Open Records Releases <p><b>Commercial and Private Sector Entities</b></p> <p>I. Service Providers &amp; Vendors:</p> <input type="checkbox"/> Third-Party Service Providers / Contractors / Vendors <input type="checkbox"/> Cloud Service Providers / Hosting Platforms <input type="checkbox"/> 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)

	<input type="checkbox"/> N/A (Indicate if no data is shared with or received from any of these categories)
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**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?

<i>Enter %</i>
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**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 § 63A-19-401(2)(a)(iv)?

*Yes*

*No*

*If yes, provide details:*

<i>Processing Activity Name</i>	<i>Processing Activity Type</i>	<i>Issues Identified</i>	<i>Strategies for Compliance</i>	<i>Estimated Completion Date</i>

**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:** \_\_\_\_\_

**EXHIBIT B**

**CITY OF MOAB WEBSITE PRIVACY NOTICE**

## Privacy Policy of Moab City

### **Purpose of Privacy Notice**

Moab City (the “City”) is committed to protecting residents’ personally identifiable information. The purpose of this Notice is to inform residents regarding the City’s collection and use of personally identifiable information. This information is provided on City website and on account application cards.

### **Definition of Personally Identifiable Information**

For purposes of this Notice “Personally Identifiable Information” means any information relating to an identified or identifiable individual who is the subject of the information. This information could include information that identifies a user by name, account number, physical or mailing address, email address, telephone number, Social Security number, credit or debit card information, or bank account information. This information may include any combination of the above or other personal information that could be used to determine identity.

### **Information Gathered by the City**

The City only collects the Personally Identifiable Information that is required to carry out and provide services to the residents [or users of our services].

Some digital services require the creation of a user account that may use some personally identifiable information. Such information is only used by the City to provide these government services.

The City will make every reasonable effort to protect Personally Identifiable information. The City does not disclose gathered personal information to any third parties inside or outside the City except as required by law or to provide a service for which the City has contracted with a third party.

### **Access to Personally Identifiable Information from Governmental Websites and the Governmental Records Access and Management Act**

As a municipal government, the City is a public governmental body subject to Chapter 2, Title 63 of the Utah Code, the law entitled the Government Records Access and Management Act (GRAMA). Information about GRAMA can be found on the Utah State Legislature website at <https://le.utah.gov/xcode/Title63G/Chapter2/63G-2.html>. If an appropriate request is made to the City for information that is subject to disclosure under Chapter 2, and not made confidential elsewhere in the Utah Code, the City may be required to disclose the information requested, even if it may include your personally identifiable information. While Chapter 2 sets the general policies for access to government records in the state of Utah, other sections of the Utah Code as well as other federal laws also deal with confidentiality issues.

All records that are prepared, owned, received, or retained by a governmental entity that may be reproduced by certain means are considered public, unless they are classified as private, controlled, or protected, as outlined in GRAMA Code 63G-2, or are records to which access is restricted according to court rule, other State law, federal law, or federal regulation. Personally identifiable information is not a classification of records under GRAMA.

### **Data Security**

The City is committed to data security and the data integrity of Personally Identifiable Information that is gathered and takes reasonable precautions to protect such information from loss, misuse, or alteration. The City maintains physical, technical, and administrative safeguards. The City restricts access to personal data to only those employees who need the information to provide necessary City benefits or services. As with any transmission over the Internet, there is always some element of risk involved in sending personal information. Unless otherwise prohibited by state or federal law, rule or regulation, an individual is granted the ability to access and correct personally identifiable information whether the information inaccuracy was accidental or by created unauthorized access. Individuals should be aware, however, that even though protections are in place, the City cannot guarantee against the occurrence of hardware failure, unauthorized intrusion, or other technical problems.

### **Information Storage**

Retention of records follows the State's General Retention Schedule (<https://archives.utah.gov/rim/retention-schedules.html>). Retention timelines can vary depending on what kind of information you provide.

### **Sharing Information**

The City may share information or statistics with third parties or the public in an anonymous form that does not directly identify individuals. No Personally Identifiable Information would be shared. Additionally, if a user is having issues with an online City service, the City may share information with outside parties to the extent necessary to troubleshoot the issues or enhance the performance of the system.

### **If We Are Required by Law to Disclose Information**

Under certain circumstances, the City may be required by law to disclose certain information to law enforcement authorities. Suspicious emails, electronic threats, and any information on illegal activity may be provided to the appropriate authorities.

### **Changes to this Privacy Notice and Security Policy**

The City reserves the right to change or amend this Privacy Notice from time to time and reserves the right to do so without notice.

**Identity of the City's website operator and contact information:**

City is the operator of the City's website. Any questions or concerns related to privacy or correcting any Personally Identifiable Information may be directed to the Moab City by telephone at [phone number] or electronically by emailing [email].