

**RESOLUTION #2026-0107-1-R**

**A RESOLUTION TO ADOPT THE TOWN OF ROCKVILLE PRIVACY PROGRAM POLICY**

**WHEREAS**, the Town Council of the Town of Rockville is required to adopt a Privacy Program Policy to provide guidance on the State's Privacy Program as set forth in Utah Code § 63A-19-401(2)(a), which aligns with the records management and data governance requirements provided in both GRAMA and DARS. Where applicable, this policy will refer to other documents such as a Privacy Framework for the Town of Rockville and may refer to more specific or detailed policy, procedures, or guidance that address a particular practice that the Town of Rockville has developed. This Policy will address the types of personal data that could be collected, how it is used and how long it is retained or to what circumstances it could be disclosed. It will also outline individuals' rights with regard to their own data.

**BE IT THEREFORE RESOLVED** by the Rockville Town Council to adopt the attached Privacy Program Policy for the Town of Rockville.

**THIS RESOLUTION shall become effective immediately upon passage and signature.**

**PASSED THIS 7<sup>th</sup> day of January 2026.**

TOWN OF ROCKVILLE

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Pam Leach, Mayor

ATTEST:

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Shelley D. Cox, Town Clerk





# TOWN OF ROCKVILLE

PO Box 630206  
Rockville, UT 84763  
'2-0992

Founded 1862  
Incorporated June 30, 1987

Phone -

## Town of Rockville Privacy Program Policy

Adopted by Resolution #2026-0107-1-R

Effective Date: 1-01-2026

Revised Date: 12-31-2025

Sunset/Next Review Due:

Approved By: Town Council

### References/Authority:

Division of Archives and Records Services (DARS) at [Utah Code § 63A-12-100 et seq.](#); Government Data Privacy Act (GDPA) at [Utah Code § 63A-19-101 et seq.](#);

Government Records Access and Management Act (GRAMA) at [Utah Code § 63G-2-101 et seq.](#); and Shelley D. Cox, for the Town of Rockville, Management of Records and Access to Records at [Utah Administrative Code R13-2.](#)]

## 1. Purpose

This policy serves to document Town of Rockville's privacy program, which includes policies, practices, and procedures for the processing of personal data in accordance with Utah's Governmental Data Privacy Act (GDPA) and in accordance with [Utah Code § 63A-19-401\(2\)\(a\)](#), and which aligns with the records management and data governance requirements provided in both GRAMA and DARS. Where applicable, this policy will refer to other documents, such as a Privacy Framework for the Town of Rockville, and may refer to more specific or detailed policy, procedures, or guidance that address a particular practice that the Town of Rockville has developed. This Policy will address the types of personal data that could be collected, how that data can be used, how long it is retained and under what circumstances it could be disclosed. It will also outline individual's rights with regard to their own data.

## 2. Guiding Principles

This policy consolidates privacy practices, outlines governance roles and responsibilities, and ensures compliance with generally applicable records management, data protection, and data privacy obligations. It is designed to safeguard individual privacy rights, promote transparency, maintain the integrity and security of personal data, and ensure accountability across the Town of Rockville. This policy is meant to guide further alignment of the Town of Rockville's administrative activities with the State Data Privacy Policy as detailed in [Utah Code § 63A-19-102](#). The Town of Rockville collects the minimum necessary data to provide services. Often, this will be no data at all, or will be only data that individuals choose to share in order to receive information or certain services. Any personal data that is collected will be stored securely and released only under the conditions outlined within the policy, which will normally be with the individual's express consent.

### 3. Scope

This policy applies to all Town employees involved in the management, creation, and maintenance of records or who have access to personal data as part of their job duties. This policy also applies to all contractors of the Town that process or have access to personal data as a part of the contractor's duties under an agreement with the Town of Rockville pursuant to [Utah Code § 63A-19-401\(4\)](#).

### 3. Definitions:

"Appointed Records Officer" (ARO) means the individual appointed by the chief administrative officer of each governmental entity, to work with state archives in the care, maintenance, scheduling, designation, classification, disposal, and preservation of records.<sup>1</sup>

"Classification," "classify," and their derivative forms mean determining whether a record series, record, or information within a record is public, private, controlled, protected, or exempt from disclosure under [Subsection § 63G-2-201\(3\)\(b\)](#).<sup>2</sup>

"Cookie" means "Technology that records a user's information and activity when the user accesses websites. Cookies are used by website owners, third parties, and sometimes threat actors to gather user data."<sup>3</sup>

"Data breach" means the unauthorized access, acquisition, disclosure, loss of access, or destruction of personal data held by a governmental entity, unless the governmental entity concludes, according to standards established by the Cyber Center, that there is a low probability that personal data has been compromised."<sup>4</sup>

"Designation," "designate," and their derivative forms mean indicating, based on a governmental entity's familiarity with a record series or based on a governmental entity's review of a reasonable sample of a record series, the primary classification that a majority of records in a record series would be given if classified and the classification that other records typically present in the record series would be given if classified.<sup>5</sup>

"Device fingerprinting" means collecting attributes of a user's device configurations to create a trackable profile for the device.

"Individual" means a human being.<sup>6</sup>

"Key logger" means "a program designed to record which keys are pressed on a computer keyboard..."<sup>7</sup>

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<sup>1</sup> [Utah Code § 63G-2-103\(27\)](#)

<sup>2</sup> [Utah Code § 63G-2-103\(3\)](#)

<sup>3</sup> Cybersecurity & Infrastructure Security Agency, Project Upskill Glossary. Last visited 12/1/2025 at: <https://www.cisa.gov/resources-tools/resources/project-upskill-glossary>

<sup>4</sup> [Utah Code § 63A-19-101\(4\)](#)

<sup>5</sup> [Utah Code § 63G-2-103\(7\)](#)

<sup>6</sup> [Utah Code § 63G-2-103\(13\)](#)

<sup>7</sup> National Institute of Standards and Technology, Computer Security Resource Center, Glossary. Last visited 1/14/2025, at: [https://csrc.nist.gov/glossary/term/key\\_logger#:~:text=Definitions%3A,NIST%20SP%20800%2D82r3](https://csrc.nist.gov/glossary/term/key_logger#:~:text=Definitions%3A,NIST%20SP%20800%2D82r3)



“Personal data” means information that is linked or can be reasonably linked to an identified individual or an identifiable individual.<sup>8</sup> It corresponds to “Personally Identifiable Information” as commonly used in federal policy and regulation.

“Processing activity” means any operation or set of operations performed on personal data, including collection, recording, organization, structuring, storage, adaptation, alteration, access, retrieval, consultation, use, disclosure by transmission, transfer, dissemination, alignment, combination, restriction, erasure, or destruction.<sup>9</sup>

“Record” means the same as that term is defined at [Utah Code § 63G-2-103\(25\)](#).<sup>10</sup>

“Record series” means a group of records that may be treated as a unit for purposes of designation, description, management, or disposition.<sup>11</sup>

“Schedule,” “scheduling,” and their derivative forms mean the process of specifying the length of time each record series should be retained by a governmental entity for administrative, legal, fiscal, or historical purposes and when each record series should be transferred to the state archives or destroyed.<sup>12</sup> A “retention schedule” is the encapsulation of the known record series held by an entity along with the retention and disposal requirements associated with each record series as set forth by statute, regulation and/or policy.

## **4. Governance**

### **4.1. Chief Administrative Officers (CAOs)**

- A. The Executive Director shall designate one or more individuals to serve as a chief administrative officer (CAO) of the Town of Rockville in fulfilling the duties outlined in [Utah Code § 63A-12-103](#).
- B. The Executive Director may assign responsibility for the duties outlined in [Utah Code § 63A-12-103](#) to one, or among several, CAOs as the Executive Director sees fit.
- C. The designation of the CAO(s) shall be reported to the Utah Division of Archives and Records Services (Archives) within 30 days of the designation.
- D. If responsibility for the duties outlined in [Utah Code § 63A-12-103](#) are divided between more than one CAO, such specification should be reported to Archives along with the designation.
- E. The designation of, and responsibilities assigned to, a CAO shall be reviewed and confirmed by the Rockville Town Council on an annual basis.

### **4.2. Appointed Records Officers (AROs)**

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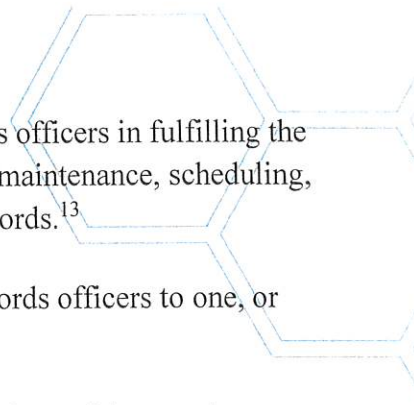
<sup>8</sup> [Utah Code § 63A-19-101\(13\)](#)

<sup>9</sup> [Utah Code § 63A-19-101\(14\)](#)

<sup>10</sup> Only the citation to the definition of “record” is provided here due to the length of the definition.

<sup>11</sup> [Utah Code § 63G-2-103\(26\)](#)

<sup>12</sup> [Utah Code § 63G-2-103\(28\)](#)

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- A. Designated CAO(s) shall appoint one or more individuals to serve as records officers in fulfilling the duties of working with Archives and the Office of Data Privacy in the care, maintenance, scheduling, disposal, classification, designation, access, privacy, and preservation of records.<sup>13</sup>
  - B. A designated CAO may assign responsibility for the duties of appointed records officers to one, or among several, officers as the CAO deems appropriate.
  - C. The appointment of records officers shall be reported to Archives within 30 days of the appointment.
  - D. If responsibility for the duties of appointed records officers are divided between more than one officer, such specification should be reported to Archives along with the appointment.
  - E. The appointment of, and responsibilities assigned to, a records officer shall be reviewed and confirmed by the Rockville Town Council on an annual basis.

## **5. Records Series**

### **5.1. Records and Records Series**

- A. The Town of Rockville shall periodically inventory data in its systems to be able to create and maintain records and records series in accordance with the requirements provided in DARS and GRAMA in addition to correlated guidance issued by Archives.
- B. The Town of Rockville shall appropriately designate and classify any records identified during inventorying and any associated records series in accordance with the requirements provided in DARS and GRAMA.
- C. CAO(s) or designee shall be responsible for submitting a proposed retention schedule for each type of material defined as a record under GRAMA to the state archivist for review and final approval by the Records Management Committee (RMC).
- D. Upon approval by the Rockville Town Council shall maintain and dispose of records in strict accordance with the approved retention schedule. In instances where the Town has not received an approved retention schedule for a specific type of record, the general retention schedule maintained by the state archivist shall govern the retention and disposition of those records.

## **6. Awareness & Training**

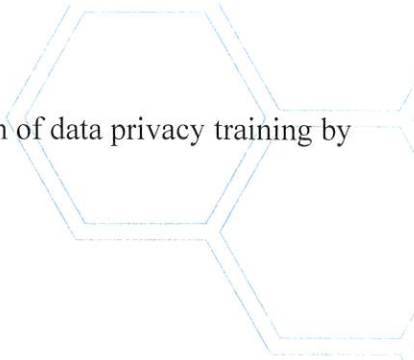
### **6.1. Departmental Data Privacy Training**

- A. The CAO of the Town of Rockville shall ensure that all employees that have access to personal data as part of the employee's work duties complete a data privacy training program within 30 days after beginning employment and at least once in each calendar year.

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<sup>13</sup> [Utah Code § 63A-12-103\(2\)](#)



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- B. The CAO of the Town of Rockville is responsible for monitoring completion of data privacy training by the Town's employees.

## **6.2. Agency-Specific Training**

- A. As needed

## **6.3. Appointed Records Officer Training and Certification**

- A. The CAO of the Town of Rockville shall ensure that, on an annual basis, all appointed records officers successfully complete online training on the provisions of GRAMA and obtain certification from Archives in accordance with [Utah Code § 63A-12-110](#).
- B. The CAO of the Town of Rockville shall, on an annual basis, review and confirm the certification status of all appointed records officers.
- C. GRAMA Access AROs: AROs who handle GRAMA transparency responsibilities are required to complete the GRAMA transparency training and obtain certification from Archives in accordance with [Utah Code § 63A-12-110](#).
- D. Records Management and Privacy AROs: AROs specializing in records management or privacy are required to complete both records management and GRAMA transparency training, as well as obtain the corresponding certifications.

# **7. Identify**

## **7.1. Inventorying**

- A. The CAO of the Town of Rockville shall maintain a comprehensive inventory of:
- a. All IT systems that may process state or federal data, if any, which the state owns or is responsible for, using the standard process that DTS provides.<sup>14</sup>
  - b. All records and record series that contain personal data and the types of personal data included in the records and record series.<sup>15</sup>
  - c. All processing activities.

## **7.2. Information Technology Privacy Impact Assessment**

- A. The CAO the Town of Rockville shall ensure that the Town of Rockville completes a Privacy Impact Assessment (PIA) for all IT systems that may process personal data prior to the initiation of data processing in the IT system as required under [DTS Information Security Policy 5000-0002](#). Privacy Impact Assessments ensure that all practices that impact personal data have been identified, classified, and appropriately protected on an ongoing basis.

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<sup>14</sup> DTS [Information Security Policy 5000-0002](#), section 2.4.2.1

<sup>15</sup> Utah Code §§ [63A-12-104](#) and [63A-12-115](#)

- B. The responsible CAO shall use the PIA template that is created and maintained by the Chief Privacy Officer and which is approved by the Chief Information Officer pursuant to [DTS Information Security Policy 5000-0002](#).
- C. CAOs must maintain a copy of each completed assessment for a period of four years to provide audit documentation and ensure accountability in privacy practices.

## 8. Transparency

### 8.1. Website Privacy Policy

- A. The CAO the Town of Rockville shall maintain privacy policies on their websites as outlined in [Utah Code § 63D-2-103](#) and [Utah Admin. Code R895-8](#).
- B. The CAO of the Town of Rockville shall ensure that personal data related to a user of a Town's website is not collected unless the Town's website complies with [Utah Code § 63D-2-103\(2\)](#).
- C. The CAO of the Town of Rockville shall ensure that all websites of the Town or its departments contain a privacy policy statement that discloses:
  - a. The identity of the governmental website operator;
  - b. How the governmental website operator may be contacted;
  - c. The personal data collected by the governmental entity;
  - d. The practices related to disclosure of personal data collected by the governmental entity and/or the governmental website operator; and
  - e. The procedures, if any, by which a user of a governmental entity may request:
    - i. Access to the user's personal data; and
    - ii. Access to correct the user's personal data.
  - f. A general description of the security measures in place to protect a user's personal data from unintended disclosure.

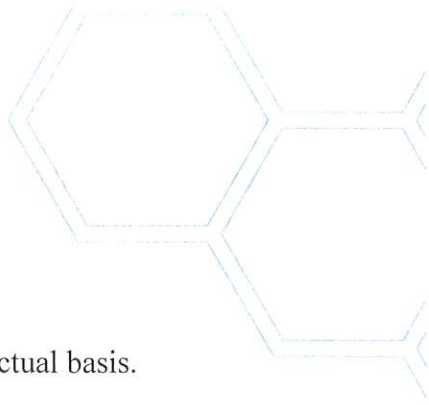
### 8.2. Privacy Notice

- A. Employees shall only collect personal data from individuals if, prior to collection of the data, the Town of Rockville has provided a privacy notice to an individual asked to furnish personal data that complies with Utah Code §§ [63G-2-601\(2\)](#), [63A-19-402](#), [63D-2-103\(2\)-\(3\)](#), or other governing law, as applicable. This may include a notice developed in accordance with any template provided by the State Auditor or other agencies of jurisdiction.
- B. Such a personal data request privacy notice shall generally include<sup>16</sup>:
  - a. the record series that the personal data will be included in;

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<sup>16</sup> Utah Code §§ [63G-2-601\(2\)](#) and [63A-19-402](#).



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- b. the reasons the person is asked to furnish the information;
  - c. the intended purposes and uses of the information;
  - d. the consequences for refusing to provide the information; and
  - e. the classes of persons and entities that currently:
    - i. share the information with the Town; or
    - ii. receive the information from the Town on a regular or contractual basis.

## **9. Individual Requests**

- A. The CAO of the Town of Rockville shall ensure that the municipality has established appropriate processes and procedures that facilitate compliance with applicable governing law for handling the following privacy requests of individuals:
  - a. Individual's requests to access their personal data;
  - b. Individual's requests to amend or correct their personal data;
  - c. Individual's requests for an explanation of the purposes and uses of their personal data; and
  - d. At-risk governmental employee requests to restrict access to their personal data.
- B. The CAO of the Town of Rockville shall ensure that the Town has established processes for public access requests to inspect or copy the Town's records, which are not requests from an individual to access their personal data.<sup>17</sup>
- C. The CAO of the Town of Rockville shall ensure that employees of Town follow established business practices with respect to GRAMA.<sup>18</sup>

## **10. Processing**

### **10.1. Minimum Data Necessary**

- A. The CAO of the Town of Rockville shall ensure that all programs within the Town obtain and process only the minimum amount of personal data reasonably necessary to efficiently achieve a specified approved purpose.<sup>19</sup>
- B. The CAO of the Town of Rockville shall ensure that all programs within the Town regularly review their data collection practices to ensure compliance with the data minimization requirement.

### **10.2. Record and Data Sharing or Selling Policy**

- A. The Town of Rockville will only share or disclose personal data when there is appropriate legal authority. The sale of personal data is prohibited unless required by law.

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<sup>17</sup> This is likely detailed in a specific Department policy.

<sup>18</sup> Dept. of Government Operations Internal Policy 01. Code of Conduct. Section 3.2 Managing Records and Information.

<sup>19</sup> [Utah Code § 63A-19-401\(2\)\(c\)](#).

- B. Data sharing must comply with GRAMA or other governing laws and may include sharing with governmental entities, contractors, private providers, or researchers. Compliance with GRAMA or other governing law is contingent upon the purpose of the sharing, the parties involved, and the nature of the records.
- C. The CAO is required to report annually to the Chief Privacy Officer on personal data sharing and selling activities, including types of data shared, the legal basis for sharing, and the entities receiving this data.
- D. All contracts involving personal data must incorporate appropriate privacy protection terms. Written agreements for data sharing are recommended to ensure compliance with applicable laws and regulations.

### **10.3. Retention and Disposition of Records Containing Personal Data**

- A. Employees shall maintain, archive, and dispose of records—which includes all personal data—in accordance with the appropriate approved retention schedule.<sup>20</sup>
- B. Employees shall comply with all other applicable laws or regulations related to retention or disposition of specific personal data held by the Town or by a particular operating unit or program of the Town.

## **11. Information Security**

### **11.1. Incident Response**

- A. The Town of Rockville adopts and follows the **DTS Cybersecurity Incident Response Plan** to manage and address all security incidents, including data breaches, and privacy violations.
- B. Employees shall report all suspected security incidents, including non-IT incidents such as unauthorized access to physical records, to the **Enterprise Information Security Office (EISO)**. Any additional agency-specific response measures for non-IT incidents are the responsibility of the CAO to develop and implement as appropriate.
- C. The CAO of the Town of Rockville shall ensure compliance with all other applicable laws or regulations related to incident response and breach notification of specific personal data held by the Town.

### **11.2. Breach Notification**

- A. Except in instances where a determination has been made that a release has a low probability of Compromising an individual, and the Town is required to provide notice to an individual or the legal guardian of an individual, if the individual's personal data is affected by a data breach in accordance with [Utah Code § 63A-19-406](#).<sup>21</sup>

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<sup>20</sup> Utah Code §§ [63G-2-604\(1\)\(b\)](#) and [63A-19-404](#).

<sup>21</sup> [Utah Code § 63A-19-401\(2\)\(b\)](#).

- B. The Town of Rockville is required to notify the Cyber Center and the State Attorney General's Office of a data breach affecting 500 or more individuals in accordance with [Utah Code § 63A-19-405](#). Any Division within the Town of Rockville that experience a data breach affecting fewer than 500 individuals must create and report an internal incident report in accordance with [Utah Code § 63A-19-405\(5\)](#). These requirements are in addition to any other reporting requirement to which the Town of Rockville may be subject.

## **12. Surveillance**

### **12.1. Covert Surveillance**

- A. Employees may not establish, maintain, or use undisclosed or covert surveillance of individuals unless permitted by law.<sup>22</sup>
- B. Employees are responsible for engaging with appropriate leadership for review—to include legal counsel where pertinent—of any activity that may be considered a type of surveillance.
- C. The CAO of the Town of Rockville shall ensure that all surveillance activities are documented and that a PIA for the activity has been completed.

### **12.2. Cookies, Fingerprinting, Key Loggers, and Tracking Technologies**

The Town of Rockville is committed to transparency and privacy protection for individuals that visit a website of the Town with regard to the use of any tracking technologies, including but not limited to cookies, device fingerprinting, key loggers, and other similar methods for monitoring or collecting information from website users.

#### **A. Cookies**

The use of cookies on the Town websites and digital services must comply with applicable privacy and security policies. Cookies should be limited to essential operational purposes, and any use of tracking or third-party cookies for analytics or similar functions must be disclosed clearly to users, with an option to consent where required by law.

#### **B. Device Fingerprinting**

Device fingerprinting is prohibited.

#### **C. Key Loggers**

Key loggers are prohibited.

#### **D. Other Tracking Technologies**

The use of other tracking technologies, such as web beacons, pixel tags, or similar tools, is prohibited.

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<sup>22</sup> [Utah Code § 63A-19-401\(2\)\(f\)](#).



### 13. Related Documents

- DTS Cybersecurity Incident Response Plan
- The Town of Rockville policy on handling public records requests under GRAMA

Adopted by the Rockville Town Council \_\_\_\_\_

CAO

\_\_\_\_\_  
Pam Leach  
Mayor

Witnessed

\_\_\_\_\_  
Shelley D. Cox  
Town Clerk