

Utah Privacy Governing Board Meeting
Senate Building, Utah State Capitol, Rm 220
December 15, 2025
10:00-11:30

Board Member Attendees: Marvin Dodge, Chair, John Dougall representing Daniel Burton, Representative David Shallenberger, Utah State Auditor Tina Cannon and Senator Kirk Cullimore

Attendees: David Sonnenreich, Kaytlin Stratton, Shane Paul, Lana Taylor, Mark Stewart Allen, Dr. Ron Moretonson

Welcome – Chair Marvin Dodge welcomed everyone to the December Privacy Governing Board meeting. He introduced the newest member Representative David Shallenberger who is replacing former Representative Jefferson Moss.

Meeting Minute Approval – Rep Shallenberger motioned to approve, John Dougall seconded the motion and the minutes were approved.

Utah Privacy Commission Update – David Sonnenreich, Chair/Utah Privacy Commission, mentioned this committee operates via sub-committees. He provided an update on those sub-committees. Currently there are no issues of concern. Chair Marvin Dodge asked about recommendations on legislative actions –Mr. Sonnenreich said they are working with the Office of Data Privacy. Chair Dodge also asked about how AI will impact the Commission – Mr. Sonnenreich feels that it will get better in the future and there will be growth – one of the commission recommendations is that decisions are not totally technology driven. There needs to be a human as part of the review process – it's difficult to know how generative AI would review those processes. There will always be a balance between being the lead state and on the leading edge.

State Privacy Policy – Chris Bramwell, Director of the Office of Data Privacy, provided a program report. He reviewed how the process works for entities. Currently most entities are at level one. Many entities didn't know there were requirements and are now working to meet them. Currently this is about implementation, not compliance and will take time. All entities must have a notice on their website stating that they are collecting information. ODP can provide a template for entities to follow, they also provide workshops for entities to attend.

Working Papers – Mr. Bramwell referenced two (2) research reports from the UVU. Utah is farther ahead than most states. He provided highlights of both reports.

Strategic Initiative – These are some of the strategic initiatives that the Office of Data Privacy will be reviewing: Record Governance Models, Data Governance Summit, State Endorsed Digital Identity (SEDI) and Data Governance System

Other Items – The Office of Data Privacy has held two (2) different summits: Data Governance and SEDI. These will be held again in 2026, May 20-21. There will also be another SEDI summit to include those who have joined the SEDI consortium. Chair Dodge asked for questions, Rep Shallenberger asked about SEDI – how do we keep pushing this and clarify what it is – individual id not government-controlled identification. The Office of Data Privacy is putting the information out there and working on it.

UVU presentation – Kaytlin Stratton presented DataGovAI along with other UVU students which is a tool that will help entities come into compliance and track maturity. Kaytlin provided a demo of the system. The system will update as changes are made in the requirements. Chief Administrative Officers (CAOs) and records officers can update the information throughout the year and see where they are in the process. This will also track IT systems, which are part of the requirements. The app should go online by May 2026 with the first 50 paying entities. Chair Dodge thanked Kaytlin and her fellow students for their work on this. This has really moved the process forward! Rep Shallenberger asked about the paying customers, Chris Bramwell said that the paying customers would use the more detailed options, i.e. heatmapping, legal research to keep the models up to date, etc. The interns are also working on other projects, marriage licensing and there are also more technical interns working on the programing aspect.

ODP Privacy Training – Shane Paul, Training Director/ODP, this year they focused on creating a website as a repository of information. They also created a training video and templates. Files could be downloaded from the site, but YouTube videos were created so that if the entity was small, they had a resource for compliance. Shane also mentioned that they had several in-person training courses that were referred to us by the Utah State Auditor's office.

For 2026 they want to increase awareness with targeted newsletters, podcasts, expanded training, content that ODP would like to focus on and directory.

ODP Ombudsperson Report – Lana Taylor, Data Privacy Ombudsperson, said that for FY2026 they have received 21 complaints, FY2025 had 19. This is more of an education and awareness opportunity. Of the twenty-one complaints, eleven were related to privacy practices of a governmental entity. This is an opportunity to ensure compliance; we do follow up to ensure that complaints are handled. Ten complaints were related to the private practices of private entities. These complaints were forward to the Commerce Department. The most common complaints related to collection of personal data, lack of transparency, unauthorized disclosure of personal data and compliance with privacy and security requirements. Lana provided an example and how it was handled. Chair Dodge asked if there were any questions there were none.

Public Comment - Chair Dodge asked for public comment –

- Mark Stewart Allen, County Delegate – if an entity is asked to fix a record, they don't have to. An error was made and Mr. Allen is still fighting the error. Records that are incorrect need to be fixed. Mr. Allen said that he believes in what is being done and thanked everyone.
- Dr. Ron Moretonson has worked with the ODP Ombudsperson regarding some complaints and he appreciated the help. The Office of Data Privacy is doing a lot and accomplishing a lot. Dr. Moretonson asked about data sharing with other entities, and we don't really know who has the ultimate control and how the information is being used. Dr. Moretonson is concerned with who and how the data is shared.

Chair Marvin Dodge thanked everyone for their participation.

Next Meeting – possibly having this meeting as a session – May 21, 2026