

A photograph of the Utah State Capitol building, a large neoclassical structure with a prominent blue dome. The building is framed by trees with vibrant autumn foliage in shades of yellow, orange, and red. The sky is a pale, clear blue. In the foreground, there are green bushes and a paved walkway.

Dr. Whitney Phillips
wphillips@Utah.gov
July 6, 2022

STATE PRIVACY OFFICER



OFFICE OF THE
STATE AUDITOR

Purpose Statement

The PPOC could adopt
fundamental privacy principles
to guide Utah's training
resources.

7 Sample Privacy Principles

1. Washington State Privacy Principles
2. General Data Protection Regulation (GDPR)
3. Fair Information Practice Principles (FIPPs)
4. Generally Accepted Privacy Principles (GAPP)
5. Organization for Economic Cooperation and Development (OECD)
6. New Zealand Privacy Principles
7. Whitney's Recommendation



1. Washington State Privacy Principles



2. General Data Protection Regulation (GDPR)

1. Lawfulness, fairness and transparency
2. Purpose limitation
3. Data minimization
4. Accuracy
5. Storage limitation
6. Integrity and confidentiality (security)
7. Accountability

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/principles/>



3. Fair Information Practice Principles (FIPPs)

1. Collection Limitation
2. Data Quality
3. Purpose Specification
4. Use Limitation
5. Security Safeguards
6. Openness
7. Individual Participation
8. Accountability

<https://iapp.org/resources/article/fair-information-practices/>



4. Organization for Economic Cooperation and Development (OECD)



OFFICE OF THE
STATE AUDITOR

Table 1: The OECD Fair Information Practices

Principle	Description
Collection limitation	The collection of personal information should be limited, should be obtained by lawful and fair means, and, where appropriate, with the knowledge or consent of the individual.
Data quality	Personal information should be relevant to the purpose for which it is collected, and should be accurate, complete, and current as needed for that purpose.
Purpose specification	The purposes for the collection of personal information should be disclosed before collection and upon any change to those purposes, and the use of the information should be limited to those purposes and compatible purposes.
Use limitation	Personal information should not be disclosed or otherwise used for other than a specified purpose without consent of the individual or legal authority.
Security safeguards	Personal information should be protected with reasonable security safeguards against risks such as loss or unauthorized access, destruction, use, modification, or disclosure.
Openness	The public should be informed about privacy policies and practices, and individuals should have ready means of learning about the use of personal information.
Individual participation	Individuals should have the following rights: to know about the collection of personal information, to access that information, to request correction, and to challenge the denial of those rights.
Accountability	Individuals controlling the collection or use of personal information should be accountable for taking steps to ensure the implementation of these principles.

Source: OECD.

5. Generally Accepted Privacy Principles (GAPP)

1. Management
2. Notice
3. Choice and consent
4. Collection
5. Use, retention and disposal
6. Access
7. Disclosure to third parties
8. Security for privacy
9. Quality
10. Monitoring and enforcement

<http://privacy.ind.in/wp/gapp/>



6. New Zealand Privacy Principles

- [Principle 1 - Purpose for collection](#)
- [Principle 2 - Source of information - collection from the individual](#)
- [Principle 3 - What to tell the individual about collection](#)
- [Principle 4 - Manner of collection](#)
- [Principle 5 - Storage and security of information](#)
- [Principle 6 - Providing people access to their information](#)
- [Principle 7 - Correction of personal information](#)
- [Principle 8 - Ensure accuracy before using information](#)
- [Principle 9 - Limits on retention of personal information](#)
- [Principle 10 - Use of personal information](#)
- [Principle 11 - Disclosing personal information](#)
- [Principle 12 - Disclosure outside New Zealand](#)
- [Principle 13 - Unique identifiers](#)

<https://www.privacy.org.nz/privacy-act-2020/privacy-principles/>



7. Whitney's Recommendation

1. **Personal participation:** Choice, notice, consent, amend, and access
2. **Lawful, fair and responsible use:** Legal and appropriate use
3. **Data minimization:** collection, storage, and destruction
4. **Transparency and Accountability:** POCs; privacy policies
5. **Security:** Adopting a standard; Reasonable security for data sensitivity/categorization
6. **Due diligence:** Trust; but verify

