



Division of
Finance



Introduction to Privacy and Records Management

2026

ROADMAP

Ice Breaker

Let's get personal

1

Privacy

It's not what you think.

2

3

What's My Purpose?

How we use records matters.

4

Records Management 101

Record series

Please hold your questions
until after the presentation.



Sign Me Up!

The astrology of a child born today:

- Chinese astrology: Fire horse
- Hellenistic (Greco-Roman) astrology: Gemini

Do you know your astrology?

- Don't put it in the chat.
- Click Thumbs Up 👍 if you know 1.
- Click Party 🎉 if you know both!



Gemini Changes Everything

Group Size (X)	Expected Accuracy	Uniqueness Rate	Identification Risk
50	96.7%	93.4%	Extremely High
100	93.4%	87.2%	Extremely High
500	72.1%	50.0%	High
1,000	54.1%	24.9%	Moderate
10,000	7.2%	~0.0%	Low

Not To Get Personal, But...

Personal Data

- Personal data is defined in Utah Code § 63A-19-101(24).
- "Personal data" means information that is linked or can be reasonably linked to an identified individual or an identifiable individual.



Privacy - It's Not About Your Secrets

Privacy ≠ Secrets

- “They can track me all they want, I have nothing to hide.”

Personal data that is definitely not secret

- An image of your face
- Your license plate number

GDPA 63A-19-401(2)(a)(ii)

- A governmental entity shall obtain and process only the minimum amount of personal data reasonably necessary to efficiently achieve a specified purpose

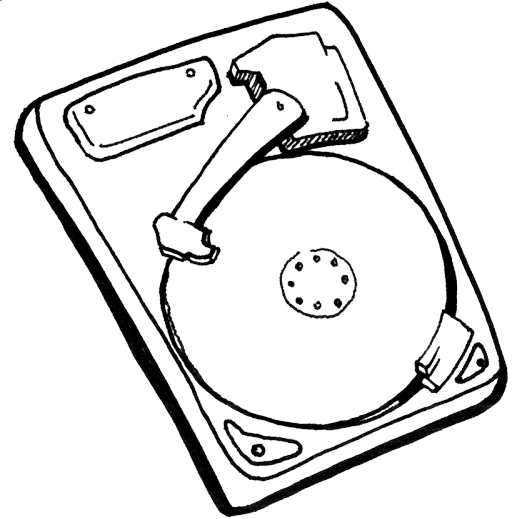
If It Is Free, You Are The Product

What Life360 offers for “free”:

- 2 day location history
- 2 place alerts
- Family driving summary
- Crash detection

What the consumer didn't know:

- Life360 and other apps were using a geolocation software that reported to a data analytics company called Arity.



The State of Texas v. Allstate

In 2025 Texas Attorney General Ken Paxton filed a lawsuit against Allstate and their data analytics subsidiary Arity. The lawsuit alleged:

- Allstate, through Arity, paid app developers to embed geolocation tracking software that reported driving habits to Arity.
- Arity used this software to track over 45 million consumers nationwide. (Roughly 1 in every 8 Americans)
- Arity sold this data to insurance companies which used the data to adjust insurance rates.
- Clear notice was not provided and they never obtained consent to track sensitive data like precise geolocation information.

Purpose Matters

63A-19-102(3)(c) “The state shall”...“process personal data only for specified, lawful purposes[.]”

We have to tie our purposes and uses back to the statute that gives us the authority to process the data.

The Golden Rule

Let me tell you a story...

- A young aspiring accountant looking to hire an employee.
- The best candidate already works for the State of Utah
- They log into State Data Warehouse and...

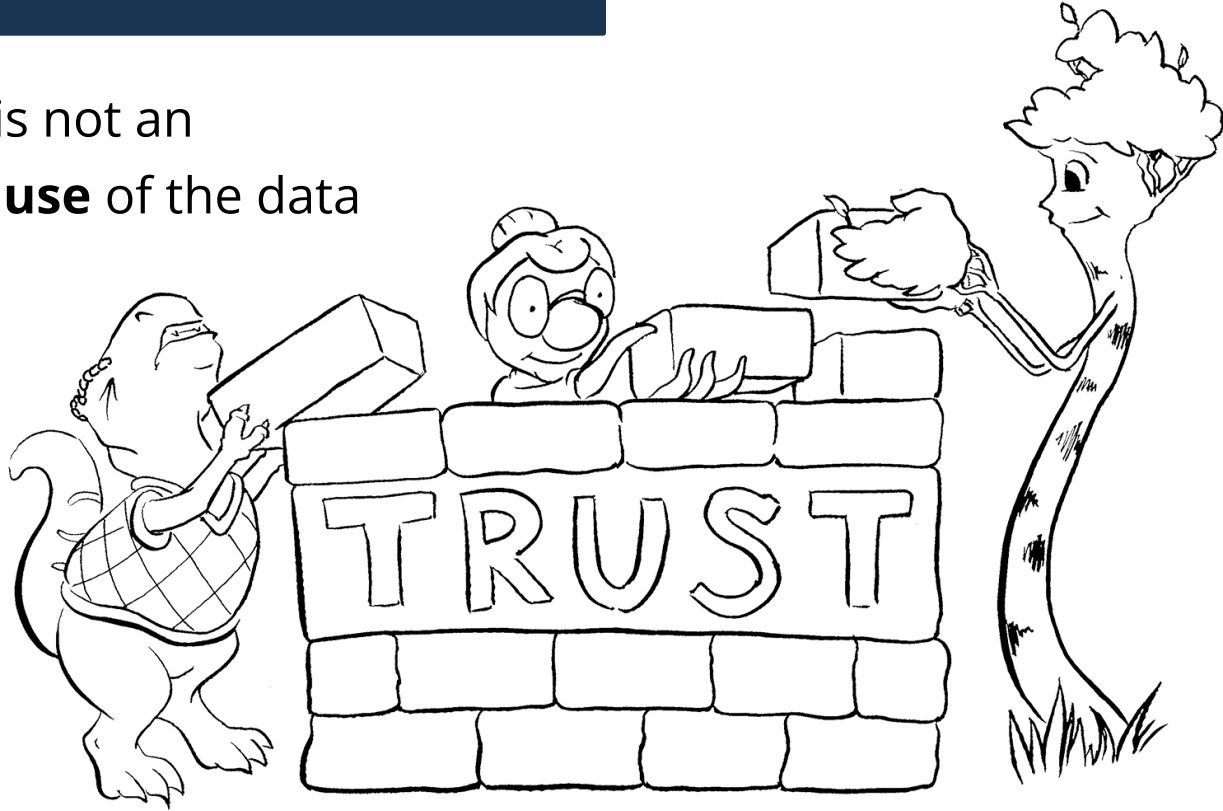


Are we the baddies?

Screening job applicants is not an authorized **purpose and use** of the data in State Data Warehouse.

Taking this action:

- Violated the job applicant's privacy
- Violated records management regulations



Data Governance 101

Record Series:

- A group of records that may be treated as a unit for purposes of designation, description, management, and disposition.

Utah Code § 63A-19-401.1(1)(b):

- After July 1, 2027, a state agency that has not created a privacy annotation for a record series containing personal data, may not collect, maintain, or use the personal data.

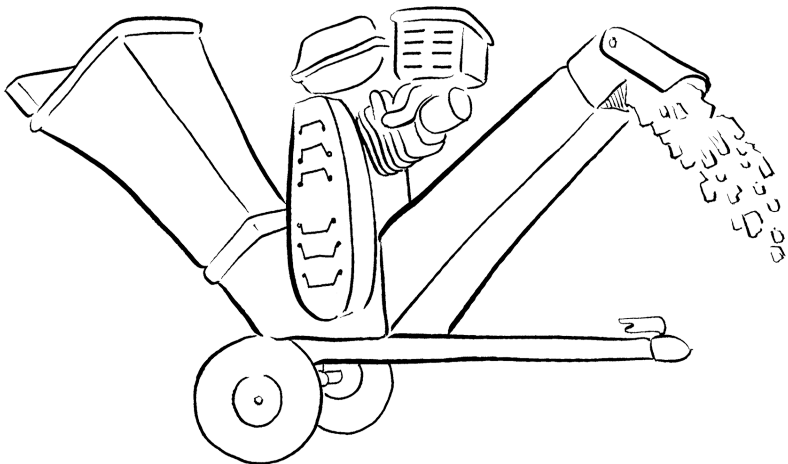


Record Series

Retention



Disposition



Legal Authority



Vantage Financial Record Series

Legal Authority - Utah Code § 63A-3-202.5

Vantage Financial Accounting Database Records - Trusts

- Trust fund transactions
- Retention - Retain for 7 years after final action
- Disposition - Destroy

Vantage Financial Vendor or Customer Table

- The Vendor List
- Retention - Retain until superseded.
- Disposition - Destroy

Vantage Financial Accounting Database Records - 10 Year

- Non-Trust fund transaction
- Retention - Retain for 10 years
- Disposition - Destroy

Vendor and Customer Vantage Financial Records

- VCCs, VCMs, and CCMs
- Retention - Retain for 10 years
- Disposition - Destroy

Network Drive Record Series

Legal Authority - Utah Code § 63A-3-103

Working Documents for Processing Vantage Financial Transactions - Trusts

- Trust fund transactions
- Retention - Retain for 7 years after final action
- Disposition - Destroy

Working Documents for Processing Vantage Financial Transactions – 10 Year

- Retention - Retain for 10 years
- Disposition - Destroy

Working documents for processing Vantage Financial transactions - 3-year

- Retention - Retain for no greater than 3 years
- Disposition - Destroy

How to Structure Record Series

Questions to get you started:

- Where do we get our legal authority to create and retain these records?
- How long do I need to retain these records?
- Is their retention based on a trigger action?
- Do they have an archive or destroy disposition?
- Do we need to restructure our shared drives?
- Who needs access to these records and who shouldn't have access to them?
- How will you address/audit access in Google shared drives? In network drives?

Don't Reinvent the Wheel

Finance Case Study Includes:

- An hour long webinar.
- List of goals and a description of the final product.
- Step by step process to complete initial discovery.
- Steps to take when updating existing record series.
- Tips for success.

Link to [Finance Case Study](#)



Rebuilding your record series

REMINDERS

1

- Privacy ≠ Secrets

2

- Personal data ≠ High risk data

3

- Start thinking about your authorized purposes and uses.

4

- Records series are are great place to start.



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