



## Privacy Policy

### Purpose

The purpose of this policy is to set forth requirements City departments will observe when information systems or other forms and applications collect the public's [personal information](#) or Personally Identifiable Information (PII). This includes the collection of metadata collected from browsing web pages openly available to the public.

### Affected Departments

- All City departments

### Policy

#### *Privacy Principles and Privacy Statement*

City departments will adhere to the requirements of the [Privacy Principles](#) and [Privacy Statement](#) and will be held accountable for compliance to the commitments outlined in these documents. This includes obligations regarding:

- **Notice:** Providing notice about the collection, use and sharing of personal information at the time such information is collected. This includes instructions about opting out of this collection, whenever possible.
- **Retention:** Adhering to the [City data retention schedule](#) and disposing of or de-identifying information as outlined in this schedule.
- **Accountability:** Maintaining documentation, available for public review and third-party monitoring, to evidence compliance with our privacy practices.
- **Accuracy:** Providing individuals the opportunity to correct data inaccuracies.

#### *Privacy Toolkit*

The Privacy Program Manager and others, as appropriate, will review projects with potential privacy impacts and provide requirements and recommendations to mitigate those impacts. City departments will use the Privacy Toolkit [Insert link] for direction regarding City privacy policies, standards and the privacy review process. The review process includes completion of the following forms, as directed by the Privacy Program Manager:

- The [Privacy Threshold Analysis](#) form that documents information systems that handle the public's personal information or Personal Identifiable Information (PII) that are evaluated for potential privacy impacts.
- The [Privacy Impact Assessment](#) (PIA) about information systems that are identified through the Intake Form review process as requiring further review by the Privacy Program Manager and others.



## Privacy Policy

### *Review*

The Privacy Program Manager will review this policy annually. Any revisions to this policy will be released in the first quarter of the year.

### *Direction*

This policy will be added to the Department of Information [Technology Polices and Standards](#) webpage.

### *Guidance*

- City of Seattle [Privacy Principles](#)
- City of Seattle [Privacy Statement](#)
- [NIST 800-53 R4](#) (Appendix J: AR-2, AR-5, TR-1)

### *Exceptions*

- Exceptions to this policy, unless expressly covered by separate ordinance, must be submitted via the [Exception Process](#).

### *Document Control*

**Owning Organizations:** Department of Information Technology, Privacy Program.

**Reviewed/ Accepted/ Adopted:** By the Technology Board.

**Update Cycle:** To be reviewed annually by the Privacy Program for possible changes; amendments will be reviewed, accepted and approved by the Technology Board, or considered for change at any time, if requested.

### **Record of Versions:**

Version	Content	Status/Comments
V 1.0	Initial Draft by Ginger Armbruster	Drafted for review July 9, 2015
	Final Version	Date accepted: 7/21/2015

Authorized this 21day of 2015 by:

Michael Mattmiller  
Chief Technology Officer  
City of Seattle