



City of Gainesville

Department of Technology and Innovation

Memo

To: Lee Feldman
From: David Duda, Department of Technology and Innovation
CC: Andrea Agha, Phil Mann, Roberta Griffith
Date: 9/9/2021
Re: Data Privacy Policy feedback from charters

Background Information

General Government staff was directed by the Digital Access Committee to create a Data Privacy Policy at their meeting of January 13, 2020. During the Digital Access Committee meeting on June 14, 2021, direction was given to have the Charter Officers review the policy. Staff has received input from the City Auditor.

City general government staff recommends moving forward with the draft from October 26, 2020 (attached) for only general government to decrease the liability of collected data.

Charter Officers' Feedback

The policy was circulated to all the City Charter Officers and we received the following feedback from the City Auditor Ginger Bigbie,

Thank you for sharing. My feedback relates to the need for enterprise-wide approach to defining our data classifications and expected security for those classifications to ensure strong data management practices.

- Section 3, data categorization, 119.071 pertains to exemptions from public records requests so maybe section 3 could refer to exempt from inspection or copying, the need for the vendor to maintain security/confidentiality over those "exempt" records. It's not clear what is expected in the current policy draft.
- Section 4 Security actually refers to Florida's records retention guidelines. Perhaps this section can refer to record retention.
- Security – The City should adopt a data classification schema that includes expected security for each classification bucket. You might include the City's data classification table in the appendix.

- Recourse – what will happen if the vendor does not comply with our data protection policy?

Attached is a data classification workflow example from a university that is simple, using restricted data, private data, and public data buckets.

Data Classification Workflow

