

Comment Period: In an effort to make our publications accurate and useful to our intended audience, we invite individuals who work for and with government entities to read this draft and provide comment. The comment period will end January 4, 2025. Comments should be submitted to Nora Kurzova at nkurzova@utah.gov.

Privacy Alert 2024-04 - DRAFT

Date: December 4, 2024

Subject: Why a Data Inventory Is Essential

What Is a Data Inventory?

A data inventory is like a GPS for your organization's data, showing you exactly where data is stored, how it flows, who has access to it, and how it is used. It is a comprehensive catalog that helps you organize and understand your data's purpose, storage, and movement, making data inventories a critical tool for effective privacy management.

Why You Need One Now

The Utah Governmental Data Privacy Act (GDPA) requires every designated government entity to submit a data sharing report to the State Privacy Office by **May 2025**. This report must outline how you're sharing data, both internally and externally. Without a current, accurate data inventory, creating this report will be time-consuming—and the result may possibly be incomplete. <u>Click here</u> to see an example of a data sharing report.

A Real-World Example

Imagine this: A neighboring county faced a breach last year and had to scramble to figure out which data was impacted and who might have access to it. Because they didn't have a data inventory, it took weeks to track down this information.

If the same happens during your data sharing report preparation, it could lead to missed deadlines and noncompliance with statute.

How a Data Inventory Helps You

- Speeds Up Reporting: An inventory gives you an instant view of which data you have and
 who you're sharing it with. No scrambling through files or asking multiple departments for
 updates.
- Ensures Accuracy: Your data sharing report must reflect the current state of your data practices. A complete inventory helps you avoid errors or oversights that could lead to compliance issues.
- **Identifies Gaps:** An inventory highlights any missing or incomplete records about data sharing, allowing you to address them proactively.

Reduces Risk: Understanding your data flows, including their purpose, makes it easier to
spot unnecessary or risky data-sharing practices. Plus, once you know where your most
sensitive data resides, you can implement the right protection to reduce exposure and
better safeguard it from breaches.

What to Do Now

- 1. **Start (or Update) Your Inventory:** Catalogue which data your department collects, where it is stored, who has access, and whether it is shared externally.
- 2. **Automate if Possible:** Use tools to track and categorize data more efficiently, especially if you handle large volumes.
- 3. **Coordinate Across Teams:** Make sure every department is contributing accurate and up-to-date information.
- 4. **Schedule Check-Ins:** Regularly review and update your inventory to ensure it stays accurate as processes change.

Conclusion

A good data inventory is not just about meeting requirements, it is about making your work easier and more efficient. Knowing exactly which data you have and where it flows takes the guesswork out of reporting and helps you spot opportunities to improve processes or reduce risks. If you need help or guidance, reach out to the State Privacy Office today.