

Office of Data and Innovation

Record Title	Description	Retention	Classification	Comments	Schedule #
Privacy Program: Administration & Governance	Program framework, privacy policies, privacy standards, and governance materials for the County Privacy Program.	Permanent or superseded + 10 years	Public (§63G-2-301 — no data on individuals)	(Approved by RIM 10/14/26)	PP-001
Privacy Program: Privacy Reviews, PIAs & Data Sharing Reviews	PIAs, privacy reviews, data sharing reviews, AI reviews involving personal data, vendor/procurement privacy reviews, risk findings, approvals, mitigation notes, and supporting documents.	Life of project/system/agreement + 7 years	Private (§63G-2-302(2)(d) — PIA documents personal data/risk findings; PIA template deliberately excludes security detail, so not a §106/§305(12) record; vendor material Protected only on a filed §63G-2-309 claim)	(Approved by RIM 10/14/26)	PP-002
Privacy Program: Privacy Notices & Public Privacy Guidance	Agency privacy notices, website notices, redirect notices, notice inventory, public privacy pages, resident-facing FAQs, published versions, superseded versions, and update history.	Superseded + 7 years	Public (§63G-2-301 — drafted for publication (§63A-19-402/-402.5))	(Approved by RIM 10/14/26)	PP-003
Privacy Program: Annual Reporting & Agency Compliance Tracking	Annual privacy reports, agency annual reporting submissions, agency maturity assessments, final reports, and supporting annual reporting documentation.	7 years after the reporting year closes	Protected (§63A-19-401.3(2) → §63G-2-305; matches your FY2027 plan's authority line)	(Approved by RIM 10/14/26)	PP-004
Privacy Program: Individual Privacy Requests & Restrictions	Requests for access, correction, amendment, explanation, at-risk employee restrictions, Safe at Home/address replacement coordination if handled by the Privacy Program, routing notes, verification, final action, and closure records	Active request/restriction + 7 years after closure	Private (§63G-2-302(2)(d); At-Risk records private under §63G-2-303/§63A-19-408)	(Approved by RIM 10/14/26)	PP-005

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Privacy Incidents & Breach Support	Data security and privacy incident reporting forms, Cyber Center submissions, and related supporting documentation.	7 years after incident closure; longer if legal hold applies	Mixed — Protected/Private (§63G-2-305(12)/§106 for access-method/security detail (§63A-19-405(2)(b)); affected-individual data Private under §302(2)(d))	(Approved by RIM 10/14/26)	PP-006
Privacy Training Records	Privacy training materials and annual training completion records are maintained by the Privacy Program.	Materials: superseded + 3 years; completion: separation + 3 years	Public (materials) / Private (completion) (Materials §63G-2-301; individual completion §63G-2-302(2)(d))	(Approved by RIM 10/14/26)	PP-007