

# Policy: Data Governance 1.7.1

## Data Privacy: Employee Responsibility to Protect the Privacy of Data

**Subject matter expert:** Privacy Officer, Director's Office Division

**Effective date:** 4/17/2020

**Reference:** [RCW 40.16](#)

**Next review date:** 4/1/2023

[RCW 43.105.365](#)

**Accompanying procedure:** None

[E2SSB 5497](#)

[Governor's EO 16-01](#)

[Governor's EO 17-01](#)

[OCIO 141.10](#)

Agency Policy 1.7.9

Agency Policy 1.7.11

DOL Classification and  
Handling Standards

This policy applies to all Department of Licensing (Agency) Employees and contractors as contract allows.

### Policy

**1. The Agency has an obligation to protect the privacy of the customers we serve.**

#### 2. Training

Employees will complete any Agency required data privacy training within 30 days of hire and then annually.

#### 3. Data Minimization and Use Limitation

3.1 Employees will follow Agency Policy 1.7.3 when collecting sensitive and confidential information and only:

- a. Collect information that is necessary for business purposes or as defined by a legal authority; and
- b. Use the information for the purpose it was collected, or as authorized by law.

3.2 Upon request, authorized Employees will identify to customers:

- a. The circumstances where their personal information is disclosable; and
  - b. The procedures for them to review and correct their inaccurate or incomplete personal information.
- 3.3 The Agency will follow Agency Policy 1.7.5 to dispose of sensitive and confidential information that meets its required retention period.

#### **4. Accessing Sensitive and Confidential Information**

Employees will only access sensitive and confidential information when they have authority and a business reason.

#### **5. Protecting Sensitive and Confidential Information Internally**

- 5.1 Employees with authority to access sensitive and confidential information will protect it from Employees and Contractors who do not have authority and a business reason to access the information.
- 5.2 Employees with authority to share sensitive and confidential information internally will redact any information the receiving party does not have authority to access.

#### **6. Protecting Sensitive and Confidential Information Externally**

Employees will follow Agency Policy 1.7.9 when they receive an external requests for sensitive or confidential information.

#### **7. Displaying privacy policies**

The Agency will display the Agency's privacy policies on the agency internet website. ([Governor Executive Order 16-01](#))

#### **8. Policy violation**

- 8.1 Employees who violate this policy will receive corrective or disciplinary action up to and including termination. The Employee may also be subject to criminal prosecution.
- 8.2 Employees will immediately notify their Supervisor or a Manager if they observe anyone violating this policy.

#### **Definitions**

**Customer:** The person or business who provides the Agency with their information in order to receive a service.

**Data:** Any information held by the Agency. This includes sensitive and confidential information, personally identifiable information, facts or information in electronic records, paper records, emails, text messages, recordings, and images.

**Non-Agency Data:** Any data acquired from another entity, typically through a contract. These data may be considered proprietary by the owner, and the Agency may not have authority to share it with third parties.

**Personally Identifiable Information:** Information about a natural person that identifies a specific individual. Examples of personally identifiable information includes an individual's name, driver's license number, address, and phone number.

**Personal Information:** Any data that relates to, or can be used to identify an individual or person, including personally identifiable information. Personal information also includes less sensitive information, that when combined, allows others to determine the identity of a person. Examples of personal information includes Internet Protocol (IP) address, email address, geolocation, screen name, photographs, professional licenses and social media posts.

**Sensitive and Confidential Information (category 2, 3 or 4):** Defined in the DOL Classification and Handling Standards.

Note: this document has been revised from the original, removing hyperlinks to internal agency documents and signatures, and reformatted for accessibility.