

---

**Table of Contents**

I.	Policy Statement	Page 1
II.	Purpose	Page 1
III.	Scope of the Policy	Page 2
IV.	Exemptions	Page 2
V.	Related Policies, Standards, Guidelines	Page 2
VI.	Impact	Page 3
VII.	Maintenance	Page 3
VIII.	Effective Date	Page 4

**I. Policy Statement**

**A. Policy**

It is the policy of the State of Colorado to promote the use of Fair Information Practice Principles in the development of privacy policies for state agencies. Further, it is the policy of the State to work to protect its information assets and to comply with explicit and implicit privacy requirements as specified under the law, including, without limitation, rules, regulations, and policies. It is also the policy of the State to coordinate the State's varied responsibilities among and between the State's agencies to enable the efficient and effective use of information assets without compromising privacy rights associated with these assets.

**B. Statutory Authority**

C.R.S. 24-37.5-106(1)(h); C.R.S. 24-37.5-202(1)(e); C.R.S. 24-37.5-204

**C. Coordinating Agency Authority**

C.R.S. 24-37.5-106(1)(h); C.R.S. 24-37.5-204

**II. Purpose**

The primary purpose of this policy is to assist State agencies in complying with its privacy responsibilities. Secondly, it is the purpose of this policy to optimize the State's communication and information resource technologies through effective, efficient data sharing where possible and appropriate without compromising the privacy of its information assets.

The objectives of the Website Data Collection Privacy Policy are to:

- Identify the numerous privacy restrictions and responsibilities of each State agency
- Determine the business processes that can be streamlined within and between agencies and the information that can be shared without compromising the privacy of the State's information assets.
- Coordinate privacy efforts among state agencies.
- Assist State agencies in developing a website data collection privacy policy.
- Audit state agency privacy efforts

- 
- Identify appropriate risk mitigation processes for the State to use in meeting its numerous privacy responsibilities so as to:
    - Leverage the state's current investments and maximize utilization of its current resources;
    - Coordinate planning for future acquisitions, and
    - Direct the overall use of the state's technology investments to best benefit the privacy of its citizens.

### **III. Scope**

This policy applies to all state agencies as defined by CRS 24-37.5-102 (5). All State agencies shall incorporate the Website Data Collection Privacy Policy into its strategic planning and budget review.

### **VI. Exemptions**

Agencies are discouraged from filing a request for exemption from this policy. OIT and OSPB may jointly approve exemptions on a case-by-case basis if the request is supported by extraordinary circumstances. All requests for exemption will be handled as set forth under the procedures for the General Exemption policy.

### **V. Related Policies, Standards, Guidelines**

#### **A. Related Policies**

All website data collection efforts will be conducted in concert with the goals and objectives of the following OIT policies:

1. Security – works to promote and enhance the security of the State's systems and information assets.
2. Interoperability – facilitates and, at the same time, exacerbates the privacy of website data collection in that it allows for information to move seamlessly and unchecked unless appropriate control mechanisms are in place and utilized.
3. Infrastructure – affects the capability, capacity, and operating configurations that impact scope, depth, and timing of information sharing efforts.
4. Life Cycle Management – affects the scope and timing of purchases so as to best leverage the State's investments to protect electronic privacy.
5. \*Electronic Signatures – establishes appropriate use of electronic signatures to provide effective, efficient transactions and enhances privacy protections.

#### **B. Related Standards**

Standards shall direct and implement website data collection privacy efforts by establishing common components and data classification schemes to be used by all state agencies.

The following standards are essential to consistently meeting privacy protection goals and have been prioritized for immediate action.

1. Records Management Standard\*

- 
2. Electronic Signature Standard\*
  3. Enterprise Services Standard (e.g., Email, Directory Services, and Security)
  4. Imaging Standard\*
  5. Data Tracking Standard\*

**C. Guidelines**

Guidelines shall be used to assist in the development and implementation of the policies, processes and procedures needed to comply with this policy.

1. Privacy Guidelines\*
2. Fair Information Practice Principles
  - a. See [www.ftc.gov/reports/privacy3/fairinfo.htm](http://www.ftc.gov/reports/privacy3/fairinfo.htm)
3. Data Classification Scheme\*
4. Business Process review and Data Classification Process Guidelines\*
5. Electronic Signature Template\*

\*Publication date for these policies, standards, and guidelines TBD

**VI. Impact**

The Office of Innovation & Technology (OIT) will deny all procurement requests that are unable to demonstrate compliance with this policy.

The Website Data Collection Privacy Policy requires OIT to do the following:

- Identify and track the numerous privacy restrictions and responsibilities of each State agency.
- Assess and report on the states' current communication and information resource technologies and analyze procurement needs to protect IT related privacy concerns.
- Identify and report on each agency's known and projected short-term business needs. Map the state's potential ability share data without compromising privacy.
- Develop a migration plan that protects the privacy of designated assets and optimally utilizes the state's current IT resource technologies, strategically coordinates future acquisitions to adequately address the state's business needs. At a minimum, this plan shall identify, develop, and provide an approach to implementing common/shared services in a way that protects privacy.

This policy requires agencies to:

**VII. Maintenance**

OIT will review this policy annually.

Statewide IT Policy Title: **Website Data Collection Privacy Policy**

Effective Date: June 26, 2002

Policy Number: P-103

---

**VIII. Effective Date**

This policy shall be effective from the date of approval by the Chief Technology Officer of the State of Colorado.

*Marc Hertzman*