WaTech
Washington Technology Solutions

Privacy Policy Crosswalk

Introduction

The Office of Privacy and Data Protection created the Privacy Policy Crosswalk as a tool to help agencies align their privacy policy with the Privacy and Data Protection Policy, the Privacy Framework for State Agencies and the Washington State Privacy Principles. By using this crosswalk, agencies can ensure their privacy policies are aligned with regulatory requirements and best practices, thereby enhancing the maturity of their privacy program.

Privacy and Data Protection Policy

Is intended to help state agencies implement effective privacy practices. The content of this policy incorporates the foundational components of the Washington Privacy Framework that are appropriate for all state agencies.

Privacy Framework for State Agencies

It is intended to be a flexible and scalable starting place for agencies of varying size handling personal information of varying sensitivity. Agencies should use this framework to build out more agency-specific resources that form a privacy program skeleton to be expanded and adapted over time. Not all agencies will have all components in place but using this framework can help identify and prioritize risks and opportunities.

Washington State Agency Privacy Principles

The purpose of this document is to articulate fundamental privacy principles to guide agency practices and establish public trust.

Privacy and Data Protection Policy	Privacy Framework for State Agencies	Washington State Agency Privacy Principles
Section 1: State agencies have an obligation to protect the personal information they process to provide services and perform government functions and handle that information responsibly.	**Identify** **Govern** **Protect** **Communicate** **Respond**	**Lawful, Fair & Responsible Use; Data Minimization; Purpose Limitation; Transparency and Accountability; Due Diligence; Individual Participation; Security**
Section 2: Agencies must complete the annual privacy assessment survey conducted by the Office of Privacy and Data Protection as part of the annual certification process. See Technology Policies, Standards, and Procedures (7.b.)	**Govern**	**Transparency & Accountability, Lawful, Fair & Responsible Use**
Section 3: Agencies must designate a privacy contact.	**Identify** **Aligns with:** NIST Privacy Framework ID.BE-P	**Transparency & Accountability, Lawful, Fair & Responsible Use**
Section 4: Agencies must understand the personal information they process, as demonstrated by**:**	**Identify** **Aligns with:** NIST Privacy Framework ID.IM-P	**Lawful, Fair & Responsible Use; Data Minimization; Purpose Limitation; Transparency and Accountability; Individual Participation**
Section 5: Agencies that process personal information must establish policies and procedures consistent with the Washington State Agency	**Govern** **Aligns with:** NIST Privacy Framework GV.PO-P; CT.PO-P; CM.PO-P; PR.PO-P	**Transparency & Accountability**

Privacy Principles and other applicable laws or handling standards.		
Section 6: Agencies must conduct Privacy Threshold Analyses (PTA) and Privacy Impact Assessments (PIA) to identify and address privacy risks and potential privacy harms when required. See RCW 43.105.369 (3). See DATA-03-01-PR Privacy Threshold Analysis During Security Design Review Procedure.	**Protect** **Aligns with:** NIST Privacy Framework ID.RA-P	**Lawful, Fair & Responsible Use; Purpose Limitation; Data Minimization; Transparency & Accountability**
Section 7: Agencies must ensure all employees receive sufficient privacy awareness training related to their roles and responsibilities and the personal information they have access to.	**Communicate** **Aligns with:** NIST Privacy Framework GV.AT-P	**Lawful, Fair & Responsible Use; Transparency & Accountability**
Section 8: Agencies must enter into written data sharing agreements when sharing category 3 or category 4 data outside the agency unless otherwise prescribed by law. See SEC-08, Data Sharing Policy; RCW 39.26.340 Data-sharing agreements—When required; RCW 39.24.240 Data requests—When written agreement required.	**Protect** **Aligns with:** NIST Privacy Framework ID.PE-P; GV.PO-P; GV.AT-P	**Due Diligence**
Section 9: Agencies must dispose of personal	**Protect** **Aligns with:** NIST Privacy Framework GV.AT-P	**Data Minimization; Purpose Limitation**

information when it has met its record retention requirements and is no longer needed for the purpose it was originally collected or to comply with other legal requirements. See SEC-04-02-S Media Sanitization and Disposal Standard; Executive Order 16-01 Privacy Protection and Transparency in State Government "Modernizing State Agency Privacy Protection"; RCW 40.14.060 Destruction, Disposition of official public records or office files and memoranda – Record retention schedules; RCW 40.14.040 Records officers – Designation – Powers and duties.		
Section 10: Agencies must be transparent about how they process personal information by publishing privacy notices. See Executive Order 16-01.	**Communicate** **Aligns with:** NIST Privacy Framework CM.AW-P	**Purpose Limitation; Transparency and Accountability; Individual Participation**
Section 11: Agencies that process personal information must allow individuals to access or control their information to the extent consistent with applicable law and the government functions the agency performs.	**Respond** **Aligns with:** NIST Privacy Framework CT.PO-P	**Individual Participation**
Section 12: Agencies that process personal information must implement	**Respond** **Aligns with:** NIST Privacy Framework CM.AW-P	**Transparency and Accountability**

adequate controls, including policies and training, to identify, report and respond to privacy incidents.		
Section 13: Agencies that process personal information must monitor and review privacy and data handling practices. This may include, establishing processes to measure privacy practices effectiveness, monitoring compliance with established policies and processes, and routinely reviewing changes in collection, use and disclosure, technology, and applicable handling requirements.	**Govern** **Aligns with:** NIST Privacy Framework GV.MT-P	**Transparency and Accountability**
Section 14: Each agency using or intending to develop, procure or use a facial recognition service, or otherwise collect, capture, purchase or obtain a biometric identifier must adhere to applicable procedures and handling requirements in Chapter 43.386 RCW Facial Recognition, Chapter 40.26 40.26 RCW Biometric Identifiers and Washington state policies.	**Protect**	**Lawful Fair & Responsible Use; Transparency and Accountability; Purpose Limitation**