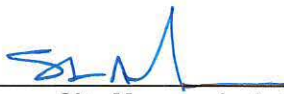


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|  <p style="text-align: center;"><b>City of Santa Ana</b><br/><b>Administrative</b><br/><b>Policies and Procedures</b></p> | <br><b>City Manager's Authorization</b> |               |
|                                                                                                                                                                                                            |                                                                                                                           |               |
| <b>Subject</b><br><b>DATA PROTECTION AND PRIVACY</b><br><b>POLICY</b>                                                                                                                                      | <b>Date</b>                                                                                                               | <b>Number</b> |
|                                                                                                                                                                                                            | 10/10/2023                                                                                                                | IT-05         |

## 1. Purpose

The purpose of this policy is to outline the City of Santa Ana's commitment to protecting the privacy and confidentiality of personal and sensitive data collected, processed, and stored by the City. This policy establishes guidelines and procedures to ensure compliance with applicable data protection laws and regulations, and to maintain the trust of individuals whose data is collected.

## 2. Scope

This policy applies to all personal and sensitive data collected, processed, and stored by the City of Santa Ana, whether in electronic or physical form. It encompasses data collected from residents, employees, contractors, vendors, and any other individuals associated with the City.

## 3. Data Collection and Processing

### 1. Purpose

Data shall only be collected for specified and legitimate City purposes and with the consent of the individuals concerned, unless otherwise authorized by law.

### 2. Data Minimization

Data collected shall be adequate, relevant, and limited to what is necessary for the intended purpose. Unnecessary data shall neither be collected nor retained.

### 3. Accuracy and Retention

Reasonable steps shall be taken to ensure that data is accurate, up to date, and relevant. Data shall be retained only for the duration necessary to fulfill the purposes for which it was collected, unless retention is required by a transactional system, by law or for legitimate operational requirements and complies with the City's Records Retention Policy.

#### 4. Data Security

Appropriate technical and organizational measures shall be consistently implemented to protect personal and sensitive data against unauthorized access, alteration, disclosure, or destruction. These measures shall be regularly reviewed and updated as necessary to ensure their continued effectiveness.

### 4. Sharing of Data

#### 1. Third-Party Access

Personal and sensitive data shall only be shared with third parties when necessary to fulfill the purposes for which it was collected, and with appropriate safeguards in place. Contracts or agreements shall be established with third-party recipients to ensure their compliance with data protection requirements and the maintenance of data security and confidentiality of the data.

#### 2. Data Transfer

When transferring personal and sensitive data to jurisdictions outside the operational jurisdiction of the City of Santa Ana, appropriate safeguards shall be implemented to ensure an adequate level of data protection in accordance with applicable laws and regulations.

### 5. Employee Responsibilities

All employees shall receive appropriate training and be aware of their responsibilities in handling personal and sensitive data. Employees shall only access and process data necessary for their job functions, and shall comply with this Data Protection and Privacy Policy, as well as any applicable laws, regulations, or internal guidelines.

### 6. Policy Compliance, Enforcement, Reporting, and Incident Response

#### 1. Data Safety

By implementing and adhering to this policy, the City of Santa Ana is committed to safeguarding personal and sensitive data, respecting privacy rights, and maintaining the confidentiality and integrity of the collected and processed data.

#### 2. Security Incidents

In the event of a data breach involving personal and sensitive data, the City of Santa Ana shall implement incident response procedures to mitigate the impact of the breach, notify affected individuals and relevant authorities as required by law, and take necessary steps to prevent future breaches.

### 3. Compliance and Monitoring

Compliance with this policy shall be regularly monitored, and appropriate measures shall be taken to address violations and breaches, including providing additional training, if appropriate.

### 4. Policy Review and Updates

This Data Protection and Privacy Policy shall be reviewed on a regular basis to ensure its continued relevance and compliance with evolving laws and regulations. Any updates or amendments to the policy shall be communicated to all relevant personnel.

### 5. Policy Violations and Consequences

Failure to comply with this Data Protection and Privacy Policy may result in disciplinary action, up to and including termination of employment or contract.

## 7. Document History

- Version 1.0: 10/9/2023 – Initial policy implementation.