



**State of Illinois**  
**Department of Innovation & Technology**  
**Enterprise Information Security Policy**  
**Privacy: Data Minimization and Retention**



**1. OVERVIEW**

The State of Illinois Department of Innovation & Technology (DoIT) will protect the integrity of Personally Identifiable Information (PII) from unnecessary collection and will ensure that all collected PII is disposed of in a secure and timely manner. Unless otherwise specified, capitalized terms contained herein shall have the meaning assigned to them in the Terminology Glossary.

**2. GOAL**

The goal of this Policy is to implement data minimization and retention standards for the collection, use, and retention of PII.

**3. SCOPE**

This Policy applies to Employees of DoIT and other State of Illinois agencies, boards, and commissions that have been identified as client agencies of DoIT through executive order, legislation, or inter-governmental agreement (Client Agencies).

**4. REQUIREMENTS**

DoIT and/or its Client Agencies will incorporate the below defined information security controls for all Information Systems. Any reference to "Agency" shall include both DoIT and Client Agencies.

**4.1 Minimization of PII**

- 4.1.1 Agency shall identify the minimum PII elements that are relevant and necessary to accomplish the legally authorized purpose of collection.
- 4.1.2 Agency shall limit the collection and retention of PII to the minimum elements identified for the purposes described in an applicable privacy notice and for which the individual has provided consent.
- 4.1.3 Agency shall conduct an initial evaluation of PII holdings and establish and follow a schedule for regularly reviewing those holdings to ensure that (i) only PII identified in an applicable privacy notice is collected and retained, and (ii) the PII continues to be necessary to accomplish the legally authorized purpose.

**4.2 Data Retention and Disposal**

- 4.2.1 Agency shall retain each collection of PII for a time period that fulfills the purpose(s) identified in an applicable privacy notice or as required by law.
- 4.2.2 Agency shall dispose of, destroy, erase, and/or anonymize the PII, regardless of the method of storage, in accordance with an approved record retention schedule and in a manner that prevents loss, theft, misuse, or unauthorized access.
- 4.2.3 Agency shall use defined techniques or methods to ensure secure deletion or destruction of PII (including originals, copies, and archived records).



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**4.3 Minimization of PII Used in Testing, Training, and Research**

- 4.3.1 Agency shall develop policies and procedures that minimize the use of PII for testing, training, and research.
- 4.3.2 Agency shall implement controls to protect PII used for testing, training, and research.

**5. POLICY COMPLIANCE**

In order to implement this Policy, the DoIT Division of Information Security establishes supplemental policies, standards, procedures, and guidelines and designates responsibility to specific personnel. To the extent necessary, each Client Agency and/or DoIT Division must establish procedures in order to achieve Policy compliance. It is the responsibility of Employees to understand and adhere to this Policy.

Failure to comply with this Policy may result in the Chief Information Security Officer temporarily discontinuing or suspending the operation of the Information System, solution, and/or resource until such compliance is established as deemed solely by the Chief Information Security Officer. Failure to comply with this Policy could also result in the loss of access to State of Illinois Information Technology (IT) Resources and/or discipline, up to and including discharge.

**6. RELATED POLICIES, STANDARDS, AND GUIDELINES**

DoIT Supplemental Information Security Policies:

- (1) Criminal Justice Information Security
- (2) Federal Tax Information Security
- (3) Payment Card Data Protection
- (4) Protected Health Information

*Revision history and approvals are reflected in ServiceNow.*