

# Data Privacy Risk Assessment Form

## Privacy Toolkit - v 0.5



Basic Information				
Bureau	City Administration – Procurement Services			
Bureau contact	Gennie Nguyen			
Contact details	gennie.nguyen@portlandoregon.gov			
Date	5/01/25			
Name of the project or application	City of Portland's Procurement Services implementation of Open Contracting Data Standard			
Step 1: Identify sensitive or protected datasets				
1A. Dataset	City of Portland's Open Contracting Data Standard. The Standard documentation can be found in the following site: <a href="https://standard.open-contracting.org/latest/en/">https://standard.open-contracting.org/latest/en/</a>			
1B. Relevant fields Use the data descriptor template. <i>[(1) List of data fields that are identifiers or quasi-identifiers (e.g., gender, ethnicity, etc.)            (2) List any location/ geo data fields]</i> <i>If the name and description of a field is sensitive or create a security risk, add a note as name, title, and description redacted due to disclosure risks.</i>	Name	Title	Description	Comments
	parties/contactPoint	Contact point	Contact details that can be used for this party.	Contact point includes name, email, phone number and web address of a party involved in the contract.  This field includes personal identifiable information in a commercial capacity in relationship with the City. This usually includes legal business names that may be the contractor's personal name.  In some cases, individuals may opt out from public disclosure due to legal exceptions like being a survivor of domestic violence. The City has mechanism to request these exceptions via the Public Records Office.  Data policies should include checking for exception flags in this field and remove personal identifiable information accordingly.

Step 2: Data management platform	
2A. Platform or vendor name	Open Contracting Partnership
2B. URLs of data management	<a href="https://standard.open-contracting.org/latest/en/">https://standard.open-contracting.org/latest/en/</a> <a href="https://www.portland.gov/business-opportunities/ocds/city-portland-ocds-publication">https://www.portland.gov/business-opportunities/ocds/city-portland-ocds-publication</a>
2C. Information about data management	<p>The City of Portland's Open Contracting Data Standard publication at <a href="https://www.portland.gov/business-opportunities/ocds/city-portland-ocds-publication">https://www.portland.gov/business-opportunities/ocds/city-portland-ocds-publication</a> makes information on city procurements and contracts accessible online and in open formats so it can be used, reused, and redistributed by any interested party.</p> <p>The City of Portland's procurement data is refreshed every two weeks through a process involving several steps before completion.</p> <p>Firstly, the data automated process pulls raw data from the shared storage, where the data is updated every two weeks by the City of Portland for BuySpeed, SAP, and B2G reports and by a city Bureau for Airtable reports.</p> <p>After the pulling has been completed, the process starts with the normalization procedure - this procedure converts the raw data into a structured format that is readable by the system. After the normalization procedure, conversion to OCDS version 1.1 begins.</p> <p>The conversion step introduces the usage of the internal mappings between normalized data and OCDS format. Whenever the conversion step is done the system indexes the result for search and download. In the end, the system filters, removes duplicates, compiles, and publishes the final OCDS data.</p> <p>Raw data is available on HCP Anywhere, while bulk downloads <a href="https://www.portland.gov/business-opportunities/ocds/city-portland-ocds-publication">https://www.portland.gov/business-opportunities/ocds/city-portland-ocds-publication</a> are updated every two weeks due to a highly time-consuming conversion process.</p>
2D. privacy policy	[enter URL of applicable privacy policy, regulations, or compliance requirements]
Step 3: Identifiability Risk Assessment	
3A. Value of Data	Value of service/data <input type="checkbox"/> Low <input type="checkbox"/> Moderate <input checked="" type="checkbox"/> High

3B-1. Risk of Data - impact assessment	(a) Individual Expectation of Privacy <input checked="" type="checkbox"/> Low <input type="checkbox"/> Moderate <input type="checkbox"/> High																									
	(b) Repercussions <input type="checkbox"/> No discernable <input type="checkbox"/> Minor <input checked="" type="checkbox"/> Moderate <input type="checkbox"/> Major																									
	(c) Impact = individual expectation of privacy X repercussions (legal, financial, etc.)  <table border="1" data-bbox="716 602 1602 773"> <thead> <tr> <th colspan="2" rowspan="2">Impact Level</th><th colspan="4">Repercussions</th></tr> <tr> <th>No discernable</th><th>Minor</th><th>Moderate</th><th>Major</th></tr> </thead> <tbody> <tr> <td rowspan="3">Individual expectation of privacy</td><td>Low</td><td>Very low</td><td>Very low</td><td>Low</td><td>Moderate</td></tr> <tr> <td>Moderate</td><td>Very low</td><td>Low</td><td>Moderate</td><td>Significant</td></tr> <tr> <td>High</td><td>Very low</td><td>Moderate</td><td>Significant</td><td>High</td></tr> </tbody> </table> <input type="checkbox"/> very Low <input checked="" type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> Significant <input type="checkbox"/> High	Impact Level		Repercussions				No discernable	Minor	Moderate	Major	Individual expectation of privacy	Low	Very low	Very low	Low	Moderate	Moderate	Very low	Low	Moderate	Significant	High	Very low	Moderate	Significant
Impact Level				Repercussions																						
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Individual expectation of privacy	Low	Very low	Very low	Low	Moderate																					
	Moderate	Very low	Low	Moderate	Significant																					
	High	Very low	Moderate	Significant	High																					
3B-2. Risk of publication - risk rating	(a) Impact: See 3B-1(c) above																									
	(b) Likelihood of re-identification attempt <input checked="" type="checkbox"/> Rare <input type="checkbox"/> Unlikely <input type="checkbox"/> Possible <input type="checkbox"/> Probable																									

(c) Risk rating = impact X likelihood of re-identification attempt

Risk Rating		Impact Level				
		Very low	Low	Moderate	Significant	High
Likelihood	Rare	Very low	Very low	Low	Moderate	Significant
	Unlikely	Very low	Low	Moderate	Significant	High
	Possible	Very low	Moderate	Significant	High	Extreme
	Probable	Very low	Significant	High	Extreme	Extreme

- ☐ very Low  
☒ Low  
☐ Moderate  
☐ Significant  
☐ High  
☐ Extreme

3C. Weigh the value of data against its risk

Value v. Risk		Value		
		Low	Moderate	High
Risk Rating	Very low risk			
	Low risk			
	Moderate risk			
	Significant risk			
	High risk			
	Extreme risk			

- ☒ Very Low  
☐ Low  
☐ Moderate  
☐ Significant  
☐ High  
☐ Extreme

#### Step 4: Privacy Solutions

4A. Should fields from this dataset be fully protected?

Given the result of Step 3C, should the dataset be fully protected?

- ☒ No  
☐ Yes  
 If "yes", do not proceed.

4AA. Does this data contain PII, HPI or CPI?	Given the result of Step 4A, should the dataset be protected? <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes
4AB. If answer in 4AA is 'Yes', Are the recommended privacy protections feasible or implemented?	Given the result of Step 4AA, should the dataset be protected? <input type="checkbox"/> <u>No</u> <input type="checkbox"/> Yes If "No", do not proceed.
4B. Identifiability spectrum level	If the answer to Step 4A above is "no", then choose an identifiability spectrum level based on the results in Step 3C: <input checked="" type="checkbox"/> Level 1: Readily identifiable data <input type="checkbox"/> Level 2: Masked data <input type="checkbox"/> Level 3: Obscured data <input type="checkbox"/> Level 4: Aggregate data
4C. De-identification methods	<i>[List de-identification methods, including de-identification of location/ geo data fields]</i>
<b>Step 5: Accessibility Risk Assessment</b>	
5A. Assess likelihood of successful reidentification	<input type="checkbox"/> Rare <input checked="" type="checkbox"/> Unlikely <input type="checkbox"/> Possible <input type="checkbox"/> Probable
5B. Is the de-identified dataset still useful?	<input type="checkbox"/> None <input checked="" type="checkbox"/> Low <input type="checkbox"/> Medium <input type="checkbox"/> High

5C. Accessibility risk rating	<table border="1"> <thead> <tr> <th colspan="2" rowspan="2">Risk Rating</th><th colspan="4">Utility Level</th></tr> <tr> <th>High</th><th>Medium</th><th>Low</th><th>None</th></tr> </thead> <tbody> <tr> <td rowspan="4">Likelihood</td><td>Rare</td><td>Very low</td><td>Very low</td><td>Low</td><td>Moderate</td></tr> <tr> <td>Unlikely</td><td>Very low</td><td>Low</td><td>Moderate</td><td>Significant</td></tr> <tr> <td>Possible</td><td>Low</td><td>Moderate</td><td>Significant</td><td>High</td></tr> <tr> <td>Probable</td><td>Moderate</td><td>Significant</td><td>High</td><td>Extreme</td></tr> </tbody> </table> <p> <input type="checkbox"/> Very low  <input type="checkbox"/> Low  <input checked="" type="checkbox"/> Moderate  <input type="checkbox"/> Significant  <input type="checkbox"/> High  <input type="checkbox"/> Extreme         </p>	Risk Rating		Utility Level				High	Medium	Low	None	Likelihood	Rare	Very low	Very low	Low	Moderate	Unlikely	Very low	Low	Moderate	Significant	Possible	Low	Moderate	Significant	High	Probable	Moderate	Significant	High	Extreme
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5D. Should the de-identified dataset be published?	<input checked="" type="checkbox"/> Open <input type="checkbox"/> Limited Access <input type="checkbox"/> Closed																															
<b>Planning</b>																																
We plan to revisit the decisions in this form every...	<input type="checkbox"/> 6 months <input type="checkbox"/> 1 year <input checked="" type="checkbox"/> Other <u>2 years</u>																															
Next date for review	May 1 <sup>st</sup> , 2027																															
<b>Notes</b>																																
[Insert any important notes]																																