

**Private and Confidential Data on Individuals
Maintained by Saint Paul Port Authority (SPPA)**

March 2026

This document identifies the name, title, and address of the Responsible Authority for the SPPA and describes private or confidential data on individuals maintained by the SPPA (see Minn. Stat. §§ 13.025 and 13.05; and Minn. Rules 1205.1200 and 1205.2000).

This document is also part of the SPPA's procedures for ensuring that non-public data are only accessible to individuals whose work assignment reasonably requires access (see Minn. Stat. § 13.05, subd. 5). In addition to the employees listed, SPPA's Responsible Authority, Data Practices Compliance Official, Executive Leadership Team, and the General Counsel will also have access to all not public data on an as needed basis as part of a specific work assignment.

SPPA's Responsible Authority is:

Todd P. Hurley, President
Saint Paul Port Authority
400 Wabasha Street North, Suite 240
Saint Paul, MN 55102

The Responsible Authority has named the following Designee to help administer and implement the requirements of the Minnesota Government Data Practices Act:

Dana Krueger, Director of Business Administration
Saint Paul Port Authority
400 Wabasha Street North, Suite 240
Saint Paul, MN 55102

Direct all questions about this document to SPPA's Data Practices Compliance Official (DPCO):

Emily Lawrence, General Counsel
Saint Paul Port Authority
400 Wabasha Street North,
Suite 240
Saint Paul, MN 55102

Index

<u>Department</u>	<u>Page</u>
Data Maintained by Many or All SPPA Departments	3-4
President's Office	5
Finance Department	6
Human Resources / Administration	7
Development	8-9
Legal - Risk Management	10

Data Maintained by Many or All SPPA Departments

The following data are maintained by more than one department at SPPA.

Name of Record, File, Process, Form, or Data Type	Description (Understandable to General Public)	Data Classification	Citation for Classification	Employee Work Access
Security Information	Data that would substantially jeopardize the security of information, possession, individuals or property against theft, tampering, improper use, attempted escape, illegal disclosure, trespass, or physical injury, if the data were released to the public	Private	MS 13.37	Certain employees on an as-needed basis as part of specific work assignments
Civil investigative data	Data that are collected in order to start or defend a pending civil legal action, or because a civil legal action is expected	Confidential Public	MS 13.39	<ul style="list-style-type: none"> • General Counsel (“GC”) • Certain employees on an as-needed basis as part of specific work assignments
Social security numbers	Social security numbers assigned to individuals	Private	MS 13.355	<ul style="list-style-type: none"> • Director of Business Administration (“DBA”) • Certain employees on an as- needed basis as part of specific work assignments
Personnel data	Data about employees, applicants, volunteers and independent contractors; labor relations information	Public Private Confidential	MS 13.43 179A.03, subd.4	<ul style="list-style-type: none"> • DBA • Supervisors on an as-needed basis as part of specific work assignments
Correspondence	Letters and electronic correspondence	Public Private Confidential	Various	Certain employees on an as-needed basis as part of specific work assignments

Name of Record, File, Process, Form, or Data Type	Description (Understandable to General Public)	Data Classification	Citation for Classification	Employee Work Access
Continuity of operations	Personal home contact information used to ensure that an employee can be reached in the event of any emergency or other disruption affecting continuity of operation of a government entity.	Private	MS 13.43, subd.17	<ul style="list-style-type: none"> • DBA • Certain employees and supervisors on an as-needed basis as part of specific work assignments
Personal contact and online account information	Telephone number, e-mail address and usernames and passwords collected, maintained, or received by a government entity for notification purposes or as part of a subscription list for an entity's electronic periodic publications as requested by the individual	Private	MS 13.356	Certain employees on an as-needed basis as part of specific work assignments
Legislative Data	Preliminary drafts of legislative and budget proposals	Nonpublic	MS 13.605	Certain employees on an as-needed basis as part of specific work assignments
Attorney Data	Data related to attorney work product or data protected attorney-client privilege	Private	MS 13.393	<ul style="list-style-type: none"> • GC • Certain employees on an as-needed basis as part of specific work assignments

President’s Office

Name of Record, File, Process, Form, or Data Type	Description (Understandable to General Public)	Data Classification	Citation for Classification	Employee Work Access
Admin response to data requests	Data collected by Admin data practices compliance official in responding to requests for data maintained by Admin	Public Private	Various	<ul style="list-style-type: none"> • President¹ • GC • DBA • Certain employees supporting the above persons
Internal audit data	<ul style="list-style-type: none"> • Data created, collected, and maintained for the purpose of performing audits and/or relating to an audit or investigation; • Working papers gathered or generated until the final report is published or audit becomes inactive 	Public Private Confidential	MS 13.392 MS 13.43 MS 13.37	<ul style="list-style-type: none"> • Chief Financial Officer (“CFO”) • Controller • DBA • Certain employees supporting the above persons

¹ The President will have access to all not public data on an as needed basis, unless such access is prohibited by applicable law, regardless of whether identified as an employee with access.
 Saint Paul Port Authority
 Data Inventory
 Private and Confidential Data on Individuals
 Last Updated - March 2026

Finance

Name of Record, File, Process, Form, or Data Type	Description (Understandable to General Public)	Data Classification	Citation for Classification	Employee Work Access
Employee expense reports (Also may be maintained by the division where the transaction originated)	Expense reimbursement requests	Public Private	MS 13.43	<ul style="list-style-type: none"> • DBA • Supervisors on an as-needed basis as part of specific work assignments
Travel expense/per diem reports for council, advisory task force and board members	Travel expense reimbursement requests	Public Private	MS 13.601 MS 13.43	<ul style="list-style-type: none"> • DBA • Supervisors on an as-needed basis as part of specific work assignments
Unemployment compensation billings	Records of billings from DEED for employee unemployment compensation	Private	MS 13.43	<ul style="list-style-type: none"> • DBA • Staff on an as-needed basis as part of specific work assignments
Government services transactions data	Credit card, charge card, debit card and other electronic transactions	Private	MS 16A.626	<ul style="list-style-type: none"> • DBA • CFO • Staff on an as-needed basis as part of specific work assignments
Loan and grant program documentation	e.g., Brownfield Development Fund, New Market Tax Credit, Trillion BTU, PACE, CORE Grant etc.), includes applications, credit and financial information, studies, correspondence, disbursement documentation, insurance certificates, etc	Public Private	MS 13.37; 13.204; 13.591	<ul style="list-style-type: none"> • CFO • VP Finance • Loan Program Analyst • Staff on an as-needed basis as part of specific work assignments

Human Resources / Administrative

Name of Record, File, Process, Form, or Data Type	Description (Understandable to General Public)	Data Classification	Citation for Classification	Employee Work Access
Employee personnel records	Record of prior and current employment history. Data relating to hiring, assessments, promotion, discipline and related administrative personnel actions, payroll records, W-4s, pension reports, PERA file, I-9 forms, affirmative action files, timesheets vacation reports, sick leave reports, benefits enrollment elections, unemployment claims/compensation	Public Private	MS 13.43	<ul style="list-style-type: none"> • DBA • GC • Supervisors on an as-needed basis as part of specific work assignments
Applicant records	Completed assessments and results, related documentation and application forms, recruitment files	Public Private	MS 13.43	<ul style="list-style-type: none"> • DBA • GC • Supervisors on an as-needed basis as part of specific work assignments
Workers compensation information	Records of billings from Risk Management for employees who receive workers compensation benefits; first report of injury documentation	Private	MS 176.231; 13.43	<ul style="list-style-type: none"> • DBA • GC • Staff on an as-needed basis as part of specific work assignments

Development – Bids, RFPs and Service Contracts

Name of Record, File, Process, Form, or Data Type	Description (Understandable to General Public)	Data Classification	Citation for Classification	Employee Work Access
Responses to Requests for Proposals (RFPs) and requests for bids	Responses to Requests for Proposals (RFPs) and requests for bids	Public Private	MS 13.591	<ul style="list-style-type: none"> • Director of Real Estate • Chief Development Officer • Staff on an as-needed basis as part of specific work assignments
Responses to Requests for Proposals (RFPs) and requests for bids	Trade secret data in response to Request for Proposal (RFP) and requests for bids	Private	MS 13.37	<ul style="list-style-type: none"> • Director of Real Estate • Chief Development Officer • Staff on an as-needed basis as part of specific work assignments

Development - Real Estate and Construction Activities

Name of Record, File, Process, Form, or Data Type	Description (Understandable to General Public)	Data Classification	Citation for Classification	Employee Work Access
Real property appraisal data (a)	Estimated or appraised values of individual parcels of real property that are made by personnel of or on behalf of the SPPA or by independent appraisers for the purpose of selling or acquiring land through purchase or condemnation	Confidential Public	MS 13.44, Subd. 3(a), 3(c)	<ul style="list-style-type: none"> • Staff on an as-needed basis as part of specific work assignments
Real property appraisal data (b)	Appraised values of individual parcels of real property that are made by appraisers working for fee owners or contract purchasers who have received an offer to purchase their property from the state or a political subdivision	Private Public	MS 13.44, Subd. 3(b), 3(c)	<ul style="list-style-type: none"> • Staff on an as-needed basis as part of specific work assignments
Responses to Requests for Proposals (RFPs) and requests for bids for Construction Manager and Design-Build projects	Any responses received to an RFP or request for bid	Public Private	MS 13.591	<ul style="list-style-type: none"> • Staff on an as-needed basis as part of specific work assignments

Legal - Risk Management

Name of Record, File, Process, Form, or Data Type	Description (Understandable to General Public)	Data Classification	Citation for Classification	Employee Work Access
Medical Data	Medical data of SPPA employees disclosed for the purposes of administering claims	Private	MS 13. 384, subd. 3	<ul style="list-style-type: none">• DBA• GC