

FORM 3 (AGENCY REPORT) (Due on or before July 31, 2022)

Agency:	New York City Campaign Finance Board		
Agency Privacy Officer:	Rudy Castro		
Email:	rcastro@nyccfb.info	Telephone:	212.409.1792
Date of Report:	July 29, 2022		

1. Specify the type of identifying information collected or disclosed (check all that apply):	
<input checked="" type="checkbox"/> Name <input type="checkbox"/> Social security number (full or last 4 digits)* <input type="checkbox"/> Taxpayer ID number (full or last 4 digits)*	<p><u>Work-Related Information</u></p> <input checked="" type="checkbox"/> Employer information <input checked="" type="checkbox"/> Employment address
<p><u>Biometric Information</u></p> <input type="checkbox"/> Fingerprints <input type="checkbox"/> Photographs <input type="checkbox"/> Palm and handprints* <input type="checkbox"/> Retina and iris patterns* <input type="checkbox"/> Facial geometry* <input type="checkbox"/> Gait or movement patterns* <input type="checkbox"/> Voiceprints* <input type="checkbox"/> DNA sequences*	<p><u>Government Program Information</u></p> <input type="checkbox"/> Any scheduled appointments with any employee, contractor, or subcontractor <input type="checkbox"/> Any scheduled court appearances <input type="checkbox"/> Eligibility for or receipt of public assistance or City services <input type="checkbox"/> Income tax information <input checked="" type="checkbox"/> Motor vehicle information
<p><u>Contact Information</u></p> <input checked="" type="checkbox"/> Current and/or previous home addresses <input checked="" type="checkbox"/> Email address <input checked="" type="checkbox"/> Phone number	<p><u>Law Enforcement Information</u></p> <input type="checkbox"/> Arrest record or criminal conviction <input type="checkbox"/> Date and/or time of release from custody of ACS, DOC, or NYPD <input type="checkbox"/> Information obtained from any surveillance system operated by, for the benefit of, or at the direction of the NYPD
<p><u>Demographic Information</u></p> <input type="checkbox"/> Country of origin <input type="checkbox"/> Date of birth* <input type="checkbox"/> Gender identity <input type="checkbox"/> Languages spoken <input type="checkbox"/> Marital or partnership status <input type="checkbox"/> Nationality <input type="checkbox"/> Race <input type="checkbox"/> Religion <input type="checkbox"/> Sexual orientation	<p><u>Technology-Related Information</u></p> <input type="checkbox"/> Device identifier including media access control MAC address or Internet mobile equipment identity (IMEI)* <input type="checkbox"/> GPS-based location obtained or derived from a device that can be used to track or locate an individual* <input type="checkbox"/> Internet protocol (IP) address* <input type="checkbox"/> Social media account information
<p><u>Status Information</u></p> <input type="checkbox"/> Citizenship or immigration status <input type="checkbox"/> Employment status <input type="checkbox"/> Status as victim of domestic violence or sexual assault <input type="checkbox"/> Status as crime victim or witness	
<p><u>Other Types of Identifying Information</u> (list below):</p> 	
<p>*Type of identifying information designated by the CPO (see CPO Policies & Protocols § 3.1.1).</p>	

2. Explain why the collection and retention of identifying information described in Question 1 furthers the purpose or mission of your agency.

The identifying information collected, retained, or disclosed by the CFB in this report relates to two categories, the first involving specific individuals and entities/organizations contributing to independent spenders' contributors. The CFB's 2020 reporting relating to this area of identifying information specifically addressed campaign contributors, independent spenders, and contributors to independent spenders (including vendors who make independent expenditure contributions). This reporting further clarifies that the identifying information collected, retained, or disclosed extends to this other group. The use of identifying information here furthers the purpose or mission of the CFB by allowing the agency to publish information about money raised and spent in City elections. This information is essential for the CFB to bring greater transparency to the democratic process in NYC, a central part of the CFB's mission. Furthermore, the disclosure of information relating to independent spenders, including individuals and entities/organizations who contribute to the contributors of independent spenders, is required under the City Charter § 1052(a)(15).

The second category for identifying information collected, retained, or disclosed by the CFB relates to NYC voters and provides additional specificity to what was previously reported in 2020. Within this category, there are four main areas where identifying information is collected, retained, or disclosed:

1. Voter mailings: These are messages sent to voters reminding them to vote in an upcoming election, providing information about that election, including relevant dates and other information.
2. Opt-in email and text alerts: These are emails and texts that people opt-in to so they can receive messages via email and text, including election updates, reminders about various election-related dates and deadlines, and other GOTV (get out the vote) related efforts.
3. Voter research: This area covers individuals and organizations that the CFB works with to perform voter-related analysis and includes focus, usability, and research groups. For example, the CFB has held focus groups regarding the agency's campaign finance program and conducted usability research on the Voter Guide.
4. Voter guide information: This category covers information provided by campaigns for inclusion as part of the citywide Voter Guide. This reporting is to specify that this Voter Guide information is disclosed to the vendor creating an application to ease the process by which candidates submit information for the Voter Guide. Specifically, the information includes candidate names, contact information (including email), social media account information, education, current and previous occupation, election cycle, candidate ID, photos, party line, office sought, organizational affiliation, prior public experience, statement, video voter guide script/appointment times, video URLs, program participation status, ballot status, and tracking dates. Based on input from the City's Chief Privacy Officer, the agency completed Form #5 to designate that the agency's APO approved this disclosure clarification on June 22, 2020.

This category of identifying information collected, retained, or disclosed by the CFB directly furthers the purpose and mission of the agency by aiding the CFB in fulfilling its mandate to promote civic engagement through community outreach, voter registration and engagement programs, educational resources, voter education, and related activities.

NYC Admin. Code §23-1205(a)(1)(f)

3. Describe the following types of collections and disclosures: (1) pre-approved as routine, (2) pre-approved as routine by the APOs of two or more agencies, or (3) approved by the APO on a case-by-case basis. Appendix B of the Agency Guidance on the 2022 Biennial Compliance Process includes examples of routine and non-routine collections and disclosures.

Add additional rows as needed.

Describe the Collection or Disclosure	Classification Type
<p>The CFB collects, retains, and discloses identifying information about specific contributors to the contributors of independent spenders, specifically name, home address, employment status, employment information, and purpose and amount of expenditures. This information is collected, retained, and disclosed to enforce laws concerning independent expenditure contributors. By using the identifying information in this limited manner, the CFB enables the public to track how money from these outside contributors is raised and spent to influence the outcome of the NYC elections.</p>	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<p>The CFB collects voter mailing information and only discloses that information directly to that voter. Specifically, the identifying information for this category is name and address. Additionally, information about voting history – specifically whether a registered voter has voted in the past and whether they are eligible to vote in an upcoming election, not how they voted – is collected during this process.</p> <p>This category involves messages sent to voters via mail reminding them to vote in an upcoming election and providing information about that election, including relevant dates and other information.</p>	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<p>The CFB collects and retains identifying information (names, email addresses, phone numbers) to provide the agency's opt-in email, phone, and text alerts. These alerts are voting and election relations and include reminders about election dates, various registration deadlines, and other GOTV (get out the vote) and related efforts. People who opt-in to email, phone, and text alerts are emailed/texted once they have indicated they have opted in. Phone numbers are used for GOTV efforts as well. Those who opt in can opt out when they choose to do so.</p>	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<p>The CFB collects identifying information (including name, age, home borough, race/ethnicity, and languages spoken) when conducting voter research relevant to the mission and purpose of the agency, including focus groups regarding the agency's campaign finance program and conducting usability research on the Voter Guide.</p>	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
<p>The CFB discloses certain candidate's identifying information (including name, contact information/email, social media account information, employer information, video voter guide appointment times, etc.) to an external vendor that is creating an application to ease the process by which candidates submit information for the Voter Guide.</p>	<input type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input checked="" type="checkbox"/> Approved by APO on a case-by-case basis

NYC Admin. Code §23-1205(a)(1)(b)

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4. If applicable, describe the types of collections and disclosures of identifying information involving your agency that have been approved by the Chief Privacy Officer as being in the best interests of the City.

Add additional rows as needed.

Describe Type of Collection or Disclosure

N/A

N.Y.C. Admin. Code §23-1202(b)(2)(b); 23-1205(a)(1)(b)

5. Describe the agency's current policies regarding requests for disclosures from other City agencies, local public authorities or local public benefit corporations, and third parties. Be as specific as possible.

NOTE: For questions 5 – 11, refer as necessary to the Model Citywide Protocol for Handling Third Party Requests for Information Held by City Agencies (on file with the Office of Information Privacy) and the Identifying Information Rider.

No changes from prior reporting.

6. Do the above policies address access to or use of identifying information by employees, contractors, and subcontractors?

Yes No

7. If YES, do those policies specify that access to identifying information must be necessary to perform their duties?

Yes No

8. Describe whether the policies are implemented in a manner that minimizes access to the greatest extent possible while furthering the purpose or mission of the agency.

No changes from prior reporting.

NYC Admin. Code §§23-1205(a)(1)(c)(1), and (4)

9. Describe the agency's current policies for handling proposals for disclosures of identifying information to other City agencies, local public authorities or local public benefit corporations, and third parties. Be as specific as possible.

No changes from prior reporting.

NYC Admin. Code §23-1205(a)(1)(c)(2)

10. Describe the agency's current policies regarding the classification of disclosures as necessitated by the existence of exigent circumstances or as routine. Be as specific as possible.

No changes from prior reporting.

NYC Admin. Code §23-1205(a)(1)(c)(3)

11. Describe the agency's current policies regarding which divisions and categories of employees have been approved by the agency privacy officer to disclose identifying information. Be as specific as possible.

No changes from prior reporting.

NYC Admin. Code §23-1205(a)(1)(c)(4)

12. Describe whether the agency has considered or implemented, where applicable, any alternative policies since 2020 that minimize the collection, retention, and disclosure of identifying information to the greatest extent possible while furthering the agency's purpose or mission.

No changes from prior reporting.

NYC Admin. Code §23-1205(a)(4)

13. Describe the agency's use of agreements for any use or disclosure of identifying information.

No changes from prior reporting.

NYC Admin. Code §23-1205(a)(1)(d)

14. Using the table below, describe the types of entities requesting the disclosure of identifying information or proposals for disclosures of identifying information. For each entity, describe (1) why the agency discloses identifying information to the entity, and (2) why any disclosures further the purpose or mission of the agency.

Add additional rows as needed.

Type of Entity	Description of Reason for Disclosure	Description of how disclosure furthers the agency's purpose or mission
Public	To comply with the legally mandated disclosure requirements relating to independent spenders. In this reporting, the CFB clarifies that this includes individuals and entities/organizations who contribute to contributors to independent spenders. The identifying information here comprises name, address, contact information, employment status, employment information, and purpose and amount of expenditure.	As mentioned above, the disclosure of information relating to independent spenders is required under the City Charter § 1052(a)(15). By collecting and disclosing this type of information, the CFB enables the public to track how money from these outside organizations or individuals is raised and spent to influence the outcome of City elections.
Vendor	To provide candidate/campaign-related information for the Voter Guide to the vendor by creating an application to ease the process by which candidates submit data for the Voter Guide.	The disclosure of this information furthers the purpose and mission of the agency by ensuring that the CFB complies with City laws mandating the creation/publication of the Voter Guide and other related materials and to help voter education. With this type of disclosure, the CFB can provide essential candidate information in a more accessible manner and will hopefully reach a wider audience as well.

		NYC Admin. Code §23-1205(a)(1)(e)


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<p>15. Describe the impact of the Identifying Information Law and other local, state, or federal laws upon your agency's practices in relation to collecting, retaining, and disclosing identifying information (i.e., if such practices would differ in the absence of these laws).</p>
<p>No changes from prior reporting.</p>
<p>NYC Admin. Code §23-1205(a)(2)</p>

<p>16. Describe the impact of the privacy policies and protocols issued by the Chief Privacy Officer, or by the Citywide Privacy Protection Committee, as applicable, upon your agency's practices in relation to collecting, retaining, and disclosing identifying information (i.e., if they have affected such practices).</p>
<p>No changes from prior reporting.</p>
<p>NYC Admin. Code §23-1205(a)(3)</p>

APPROVAL SIGNATURE FOR AGENCY REPORT

Preparer of Agency Report:			
Name:	Rudy Castro		
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ELECTRONIC SIGNATURE OF AGENCY HEAD OR DESIGNEE REQUIRED BELOW			
Agency Head (or designee):			
Name:	Amy Loprest		
Title:	Executive Director		
Email:	aloprest@nyccfb.info	Phone:	212.409.1810
Electronic Signature:		Date:	7/28/2022

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