

**Quarterly Report of the Chief Privacy Officer
on Agency Disclosures
Made Under Exigent Circumstances or
in Violation of the Identifying Information Law***

Reporting Period: June 16, 2021 through September 15, 2021

*This report is compiled in accordance with the requirements of Section 23-1202 of the New York City Administrative Code, which requires the Chief Privacy Officer to submit a quarterly report containing an anonymized compilation or summary of such disclosures to the Speaker of the City Council.

Description	Total
Total number of disclosures reported by agencies as made under exigent circumstance(s): (N.Y.C. Admin. Code § 23-1202(d)(2))	0
Total number of disclosures reported by agencies as made in violation of the Identifying Information Law: (N.Y.C. Admin. Code § 23-1202(c)(4))	31

For the reporting period June 16, 2021 through September 15, 2021 City agencies and offices have reported any collections and disclosures made under exigent circumstances, and disclosures made in violation of the Identifying Information Law, as summarized below.

Type of disclosure reported	Summary description
Disclosure in Violation of the Identifying Information Law**	Agency contractor inadvertently placed client information in an online unsecured area while the agency was in process of switching computer systems. After an independent investigation, the agency contractor reported that no other person or entity accessed the online area except for the third-party researcher that initially notified the contractor.
Disclosure in Violation of the Identifying Information Law	Agency contractor mistakenly uploaded client identifying information to shared online file storage service. The agency contractor is notifying the affected clients.
Disclosure in Violation of the Identifying Information Law	Unauthorized third party/parties unlawfully obtained personally identifying agency client information by unknown means, and used it to impersonate agency clients and access/compromise their online accounts. The agency reported the matter to relevant agency partners and local and federal authorities, and it remains under investigation. The agency has restricted access to its website and client accounts, and is notifying affected clients.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently indexed client information into other clients' files, resulting in disclosures of the mis-indexed clients' information. The agency is notifying the affected clients and offering credit monitoring.
Disclosure in Violation of the Identifying Information Law (10)	In ten instances, agency mistakenly mailed documents containing identifying information to one client that were intended for another client. The agency is notifying the individuals whose identifying information was disclosed.
Disclosure in Violation of the Identifying Information Law (2)	In two instances, agency inadvertently indexed client information into other clients' files, resulting in disclosures of the mis-indexed clients' information. The agency is re-indexing the files and has notified the affected clients.

Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently mailed sensitive client information to an unintended recipient. The agency is notifying the affected client and has taken remedial actions with staff to remind them of their confidentiality obligations and protocols for handling this type of information.
Disclosure in Violation of the Identifying Information Law***	Agency A reported that a malfunction in its application portal allowed an unauthorized third party to access personally identifying information of individuals from Agency B. Agency A promptly rectified the technical error, and is coordinating with Agency B to notify the individuals whose identifying information was disclosed, and plans to offer credit monitoring.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently emailed client information to more internal and external recipients than was intended. The agency recalled all internal emails and attempted to verify that each unintended external recipient also deleted the information. The agency reported remedial measures including confidentiality retraining and is notifying the affected clients.
Disclosure in Violation of the Identifying Information Law	Agency contractor reported data security incident affecting City clients. The agency contractor has engaged independent investigators and the investigations remain ongoing. The agency contractor will notify affected individuals.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently disclosed client information to an improper recipient. Upon realizing the error, the improper recipient notified the agency. The agency terminated the improper recipient's access to the client information and reported scheduling the implementation of a technical solution to mitigate this type of error. The agency is notifying the affected individual.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently misplaced a City-owned laptop and a client's paper application, both of which included identifying information. The City-owned laptop was password protected and not connected to the agency's network. Notification will be sent to the affected individual who had submitted the paper application who will be offered credit monitoring and additional information about resources to help manage the incident.
Disclosure in Violation of the Identifying Information Law	Agency contractor reported a ransomware attack on one of their staff computers. The affected computer did not contain any City client information.
Disclosure in Violation of the Identifying Information Law	Agency contractor reported ransomware attack. The contractor reported working with its cyberinsurance carrier and implementing security enhancements, and is working with City officials and the contracting agency to further investigate the attack and will notify affected individuals as appropriate once the investigation concludes.
Disclosure in Violation of the Identifying Information Law	Agency employee covertly recorded and shared confidential internal agency conversations with the media, in violation of agency policy. The affected individuals learned of the disclosure of their information from media coverage of those recordings.
Disclosure in Violation of the Identifying Information Law	Agency employee mistakenly emailed a form containing a client's information to multiple other clients, instead of a blank agency form. The agency recalled the email and attempted to verify that each unintended recipient deleted the information. The agency notified the affected individual and offered a year of credit monitoring.
Disclosure in Violation of the Identifying Information Law	Agency contractor improperly disposed of client information leading to its discovery by an improper party. Agency contractor reported remedial measures including additional training for staff and updating its confidentiality policy.
Disclosure in Violation of the Identifying Information Law	Agency contractor reported ransomware attack. A forensic investigation remains ongoing but any client whose identifying information was shared improperly will be notified as appropriate.

Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently shared client identifying information with an improper recipient. The agency notified the affected individual in accordance with relevant law and confirmed that the improper recipient deleted the information.
Disclosure in Violation of the Identifying Information Law**	Agency employee used an agency database to conduct unauthorized search on an individual and disclosed the information to that individual. The agency reported remedial measures, internal investigations, and review to mitigate any risk of harm or future disclosure.
Disclosure in Violation of the Identifying Information Law	Agency contractor inadvertently mailed client information to improper recipients. The agency notified the improper recipients of the error and requested that the mailings containing client information be deleted. The agency notified the affected clients and offered identity protection coverage and credit monitoring.

**Past instances reported by agency in current quarter.

***Single incident reported by two agencies.

Submitted by: _____

Laura Negrón
 Chief Privacy Officer, City of New York

Date: September 29, 2021