

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

**Reporting Period: 3rd Quarter
(December 16, 2018 through March 15, 2019)**

*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 disclosure(s) reported by agencies as made under exigent circumstance(s): (N.Y.C. Admin. Code § 23-1202(d))	0
Total number of disclosure(s) reported by agencies as made in violation of the Identifying Information Law: (N.Y.C. Admin. Code § 23-1202(c)(4))	25

For the reporting period December 16, 2018 through March 15, 2019, City agencies and offices have reported disclosures made under exigent circumstances or in violation of the Identifying Information Law as summarized below.

Type of disclosure reported	Summary description
Disclosure in Violation of the Identifying Information Law	Accidental physical loss of identifying information of clients contained in paper forms while in transit. Source agency reported that affected individuals were notified and provided with details about the occurrence, and contact information at the agency. Source agency also reported steps taken to safeguard against the incident from recurring, including employee disciplinary action and retraining.
Disclosure in Violation of the Identifying Information Law	Inadvertent posting of vendor contact information on agency's website. Source agency became aware of the error and removed the information.
Disclosure in Violation of the Identifying Information Law	Inadvertent posting of certain business emails into the cc field of an email instead of posting into bcc field, thereby exposing distribution list. Source agency reports issuing additional training and clear directives to relevant staff to safeguard against recurrence.
Disclosure in Violation of the Identifying Information Law	Inadvertent emailing of legal documents to an individual whom such documents did not pertain. Source agency reports that recipient alerted the agency and confirmed the message was deleted. Source agency reports taking further steps to safeguard against such inadvertent emailing.
Disclosure in Violation of the Identifying Information Law	Inadvertent emailing of a complete list of individuals, with identifying information, to persons not authorized to receive such information. Source agency notified all recipients on such list and requested the email and relevant attachment be deleted. Source agency reported notifying all affected individuals whose information was inadvertently disclosed, offering free credit monitoring and identity theft protection services.
Disclosure in Violation of the Identifying Information Law	Eighteen (18) instances involving inadvertent mailing of another person's documents to individuals who requested their own information, over the first three reporting periods/quarters from June 2018 through March 2019 (source agency recently learned about these incidences, and is thus reporting the cumulative number of instances for the three quarters). Source agency states that a new application was being used to generate the documents which may have contributed to the errors. Source agency reported notifying affected individuals and offering free credit monitoring services, and has provided additional training to employees.

Type of disclosure reported	Summary description
Disclosure in Violation of the Identifying Information Law	Accidental disposal of chart containing identifying information. Source agency reporting notifying the affected individual of the incident and offering free credit monitoring services.
Disclosure in Violation of the Identifying Information Law	Mistakenly discussing with one individual certain personal information of another individual. Source agency reported notifying affected individual of the incident and offering free credit monitoring services.

Submitted by: _____
Laura Negrón
Chief Privacy Officer, City of New York

Date: March 22, 2019