

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

Reporting Period: December 16, 2019 through March 15, 2020

*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)(2))	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))	13

For the reporting period December 16, 2019 through March 15, 2020, 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	Agency shared client identifying information, without clients' consent, with a research contractor. Agency notified the contractor about the error and the contractor did not use the records and will return or destroy them. The contractor is developing new research participation forms to obtain client consent where appropriate.
Disclosure in Violation of the Identifying Information Law	Agency shared with a opposing counsel, in class action litigation, a non-class member's identifying information, due to a technical error. Agency counsel requested that opposing counsel destroy the records.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently left a client file containing identifying information on public transportation. Agency drafted a notification letter to send to the client and filed lost a property report with the public transportation authority.
Disclosure in Violation of the Identifying Information Law	Agency employee posted photos of other employees on a social media platform. Agency concluded no confidential client identifying information was disclosed.. Disciplinary charges were filed against the employee responsible for the disclosure. Agency determined that notification to the affected employees was not necessary because they were aware of the disclosure of the photos.
Disclosure in Violation of the Identifying Information Law	Agency inadvertently forwarded an email including the identifying information of job applicant to the wrong agency. Agency requested that the receiving agency disregard the email and copied the job applicant on the message.
Disclosure in Violation of the Identifying Information Law	In 8 instances, agency inadvertently sent client identifying information to the incorrect recipients. Agency sent notification letters to the individuals whose identifying information was disclosed.

Amendment to the Quarterly Report of the Chief Privacy Officer on Agency Disclosures Made Under Exigent Circumstances or in Violation of the Identifying Information Law, for the reporting period September 16 to December 15, 2019:

<p>Disclosure in Violation of the Identifying Information Law</p>	<p>A reporting agency has provided a clarification for the third entry of the above-mentioned report filed during the prior reporting quarter, which is hereby amended to read as follows:</p> <p>In 4 instances, agency published online certain identifying information that was provided by members of the public that was not intended for public release. Agency has worked with the Chief Privacy Officer to address and resolve the cause of the errors.</p> <p>Agency system reproduced, online, certain identifying information submitted via an online portal by a member of the public. The agency reported notifying the affected individual of the redisclosure. Following discussion with CPO, the agency has modified its automation practices to prevent similar occurrences.</p>
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Submitted by: _____
 Laura Negrón
 Chief Privacy Officer, City of New York

Date: March 25, 2020