

**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, 2020 through March 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))	27**

For the reporting period December 16, 2020 through March 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 experienced a security incident impacting its server and computer systems. The agency reported the matter to relevant local and federal authorities. The agency is also conducting a risk assessment to determine whether any notifications are required by law, and is reviewing contracting issues with a vendor impacted by the incident.
Disclosure in Violation of the Identifying Information Law	Agency reported ransomware attack on a contracted provider of client services. The contractor reported hiring a third party investigator to resolve the issue. The investigator secured the files and rebuilt the network. The contractor subsequently sent written notifications to all individuals where a notification requirement was triggered, offering free credit monitoring in accordance with state law. The contractor reported implementation of security enhancements.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently emailed client information to another agency instead of to the intended recipients. The sending agency immediately notified the improper recipient of the error and requested that the email be deleted. The improper recipient confirmed that the email had been deleted. The sending agency reported enhanced internal security protocols and quality assurance review.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently emailed information of a client and their minor children to an improper recipient. The sending agency notified the improper recipient of the error and requested that the email containing client information be disregarded. Agency reported an ongoing investigation to understand the mechanism of disclosure and will notify the client.
Disclosure in Violation of the Identifying Information Law (6)	In six instances, agency mailed documents to one client that were intended for another client. The agency is notifying the individuals whose identifying information was disclosed. Agency reported remedial measures to enhance internal security protocols and quality assurance review.

Disclosure in Violation of the Identifying Information Law	Agency contractor inadvertently emailed client information, including participation in an agency program, to improper recipients. The contractor notified the improper recipients of the error and requested that the emails containing client information be deleted immediately. The contractor sent written notification letters to the impacted individuals notifying them of this incident, offering identity protection coverage. The contractor additionally informed the agency that several individuals agreed to delete the misdirected email.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently emailed client information to an improper recipient. The sending agency notified the improper recipient of the error and requested that the email be deleted immediately. The agency reported preparing notification letters to the affected clients.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently emailed client information to improper recipient. Agency is sending a notification letter to affected clients.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently emailed client information to an improper recipient. The sending agency immediately notified the improper recipient of the error and requested that the email be deleted immediately. Agency reported working with the Chief Privacy Officer to draft notification letter to the affected client.
Disclosure in Violation of the Identifying Information Law (2)	In two instances, agency employee emailed client information to an improper recipient. The agency notified the improper recipient of the unauthorized disclosure and confirmed that the emails will be deleted. The agency reported remedial measures to enhance internal security protocols and quality assurance review.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently shared client information to an improper recipient. The share agency immediately notified the improper recipients of the error and requested that the information be deleted immediately. Agency reported notification to the affected client.
Disclosure in Violation of the Identifying Information Law (3)	In three instances, agency mailed documents to one client that were intended for another client. In one additional instance, an agency employee handed documents containing client information to an improper recipient. The agency notified the individuals whose identifying information was disclosed.
Disclosure in Violation of the Identifying Information Law (5)**	In five instances, agency employee used an agency database to conduct unauthorized searches on individuals and disclosed the information to unauthorized parties. The agency reported remedial measures and an internal investigation, and review to mitigate any risk of harm or future disclosure.
Disclosure in Violation of the Identifying Information Law (2)	In two instances, agency employee recorded agency video footage, which was subsequently shared with other employees, third parties, the media, and the public. The agency reported remedial measures and an internal investigation and review to mitigate any risk of harm or future disclosure.

**Past instances reported by agency in current quarter

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

Date: March 22, 2021