

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

Reporting Period: March 16, 2020 through June 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))	2
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))	10

For the reporting period March 16, 2020 through June 15, 2020, City agencies and offices have reported 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 employee inadvertently disclosed to a partner organization more identifying information than had been authorized. Agency confirmed that the additional identifying information was promptly deleted and was not shared further.
Disclosure in Violation of the Identifying Information Law	Agency employee posted video of an agency client to an online platform. The video was removed and disciplinary action was taken against the employee responsible for the disclosure. Agency made the required notifications.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently emailed a document containing identifying information to another agency. The sending agency immediately notified the other agency, which promptly deleted the document. The agency reported implementing additional safeguards to prevent similar disclosures.
Disclosure in Violation of the Identifying Information Law	Agency inadvertently disclosed identifying information due to a technical error on the agency's website. The agency promptly corrected the technical error.
Disclosure in Violation of the Identifying Information Law	Agency received an allegation that it improperly disclosed identifying information to a third party landlord. The agency's legal department is investigating the allegation.
Disclosure in Violation of the Identifying Information Law	Agency employee, in an attempt to email a report containing identifying information to their supervisor, inadvertently emailed a third party. The agency is investigating remedial steps.

Disclosure in Violation of the Identifying Information Law	Agency inadvertently included references to identifying information in a document it shared with a service provider. The agency has directed the service provider to destroy this document and is replacing it with the subject identifying information removed.
Disclosure in Violation of the Identifying Information Law	Agency inadvertently disclosed additional client identifying information to a City contractor than had been authorized. The contractor promptly destroyed the additional data on request.
Disclosure in Violation of the Identifying Information Law	In two instances, agency mailed documents to one person that were intended for another person. In one instance the documents were returned. The agency is notifying the individuals whose identifying information was disclosed.
Disclosure under Exigent Circumstances	Agency disclosed identifying information to a state governmental agency to expedite emergency client services during the pandemic. The agency's privacy officer subsequently approved future disclosures of this type to this agency as furthering its mission or purpose.
Disclosure under Exigent Circumstance	To address emergency client needs as a result of the COVID-19 pandemic, agency collected client identifying information from other agencies to help enroll clients in an emergency relief program. The agency also received information from clients who voluntarily entered their information into an online platform. This identifying information was shared with contractors who provided relief services. A data sharing agreement is now in place for this initiative.

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

Date: June 26, 2020