

**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, 2021 through June 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 |
|--|-------|
| <b>Total number of disclosures reported by agencies as made under exigent circumstance(s):</b><br>(N.Y.C. Admin. Code § 23-1202(d)(2))                   | 0     |
| <b>Total number of disclosures reported by agencies as made in violation of the Identifying Information Law:</b><br>(N.Y.C. Admin. Code § 23-1202(c)(4)) | 30**  |

For the reporting period March 16, 2021 through June 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 reported that an employee improperly emailed client information to a personal email account. The contractor directed the employee to delete the client information and is notifying the affected clients.  |
| Disclosure in Violation of the Identifying Information Law (2) | In two instances, agency reported inadvertently indexing 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 (2) | In two instances, agency mailed documents to one client that were intended for another client. The agency is notifying the individuals whose identifying information was mistakenly disclosed.   |
| Disclosure in Violation of the Identifying Information Law     | Agency employee inadvertently disclosed client information to other employees. The agency reported re-training the employee and enhancing internal security protocols.   |
| 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 agency partners and local authorities. Although no evidence exists to show any data being compromised, the agency disclosed client information as part of the City's investigation to confirm that client information was not improperly accessed or shared.                |
| Disclosure in Violation of the Identifying Information Law (3) | Contractor of three City agencies mistakenly emailed City client information, including certain sensitive information, to other entities doing business with the contractor. The contractor notified the improper recipients of the error and requested that the emails containing client information be deleted immediately. The contractor sent notification letters to the other business clients and |

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|--|---|
|  | requested confirmation of deletion. The City agencies are notifying affected clients and are offering identity protection coverage and credit monitoring.   |
| Disclosure in Violation of the Identifying Information Law       | Agency employee inadvertently revealed the email addresses of subscribers to a public email distribution list when emailing a public calendar update.   |
| Disclosure in Violation of the Identifying Information Law       | Agency employee inadvertently mailed client information to improper recipient. Agency is sending a notification letter to affected client.  |
| Disclosure in Violation of the Identifying Information Law       | Agency reported ransomware attack on a contracted provider of client services. The contractor sent written notifications to all individuals where a notification requirement was triggered, offering free credit monitoring in accordance with state law. The contractor reported implementing security enhancements and is working with the CPO, Law Department, Cyber Command, and the contracting agency to further investigate the attack.                  |
| Disclosure in Violation of the Identifying Information Law (2)   | In two instances, agency shared client information without authorization. The agency notified the individuals whose identifying information was disclosed. In the first instance, client information was intentionally shared orally, and the employee was subject to disciplinary action. In the second, client information was mistakenly handed in-person to the improper recipient, and the employee was provided with additional confidentiality training. |
| 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 investigating remedial measures.  |
| Disclosure in Violation of the Identifying Information Law       | Agency employee inadvertently emailed identifying information to improper recipient. 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       | Agency employee improperly emailed employee medical information to more internal recipients than was intended. The agency recalled the email and verified that each unintended recipient deleted the information.   |
| Disclosure in Violation of the Identifying Information Law       | Agency employee improperly recorded and shared agency video footage via a messaging application. The agency is investigating remedial measures.   |
| Disclosure in Violation of the Identifying Information Law (9)** | In nine (9) instances, agency employees used an agency database to conduct unauthorized searches on individuals and disclosed the information to unauthorized parties. 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 (2)   | In two instances, agency employees inadvertently included more identifying information than intended in responses to requests for disclosure. The agency informed the recipients that the information was provided in error and requested its deletion.   |

\*\*Past instances reported by agency in current quarter

**Submitted by:** \_\_\_\_\_  
 Laura Negrón  
 Chief Privacy Officer, City of New York

**Date:** June 30, 2021