

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

Reporting Period: June 16, 2019 through September 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)(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))	17

For the reporting period June 16, 2019 through September 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	Two (2) instances in which agency contractor employees inadvertently provided client information to incorrect client. The agency worked with the contractor to prepare notification of the disclosures to the affected individuals. The contractor retrained its staff regarding the protection of client information and adopted a new policy to verify a client's identity before records are provided to the client.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently emailed client information to an agency contractor employee. The recipient promptly informed the sender of the disclosure and deleted the email.
Disclosure in Violation of the Identifying Information Law	Agency contractor inadvertently provided client information to incorrect client. The agency worked with the contractor to prepare notification of the disclosure to the affected individual and to provide credit monitoring to the affected individual. The contractor also reported retraining its staff regarding the protection of client information.
Disclosure in Violation of the Identifying Information Law	Agency employees accessed client information without proper authorization. The agency notified the client's next of kin of the disclosure.
Disclosure in Violation of the Identifying Information Law	Agency employee reported missing a computing device containing client information of multiple clients. All affected individuals were provided notice of the incident and certain individuals were offered credit monitoring.

**Total adjusted by CPO to appropriate category.

Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently sent and disclosed online an unredacted document containing personal information of an individual to another individual who requested records. The agency prepared and was sending notification to the affected individual.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently emailed multiple home addresses to two (2) incorrect recipients. The agency promptly requested that the unauthorized recipients delete the emails and provided corrected emails without the information of other individuals.
Disclosure in Violation of the Identifying Information Law	Four (4) instances in which agency employees inadvertently mailed letters with identifying information to an incorrect recipient. The documents were returned to the agencies in each instance. Source agency notified the affected individuals of the disclosures. The CPO and Agency Privacy Officer will further discuss the circumstances around these disclosures.
Disclosure in Violation of the Identifying Information Law	Four (4) instances in which agency inadvertently collected and published online identifying information of an individual that was provided by a third party seeking information about the individual. The agency plans to notify the individuals whose identifying information was published online. The agency developed an automated tool to identify and redact certain information, and has explored other measures to prevent similar disclosures.
Disclosure in Violation of the Identifying Information Law	Agency employee improperly accessed internal database and subsequently disclosed identifying information of another agency employee to an unauthorized third party individual. Agency reported taking disciplinary steps.

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

Date: September 25, 2019