

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

Reporting Period: September 16, 2021 through December 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))	9

For the reporting period September 16, 2021 through December 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 employee inadvertently emailed sensitive information about another employee to unintended recipients. The affected employee was notified, and the agency reported taking remedial actions with staff to remind them of their confidentiality obligations and protocols for handling sensitive information.
Disclosure in Violation of the Identifying Information Law	Agency contractor employee, during and after employment, improperly used database to access client information. The agency reported that the contractor is notifying affected individuals and that the employee is no longer employed by the contractor.
Disclosure in Violation of the Identifying Information Law	Unauthorized third parties impersonated agency clients and accessed online accounts containing information about those clients. The agency reported the matter to relevant agency partners and local and federal authorities. The agency has restricted access to affected online accounts and notified affected clients.
Disclosure in Violation of the Identifying Information Law	Agency contractor employee used a shared password to improperly obtain client information from agency database, which was then posted on the Internet. The agency terminated the contractor's access to its database and has taken remedial actions with staff to remind them of their confidentiality obligations and protocols for handling sensitive information. The agency is notifying the affected client.
Disclosure in Violation of the Identifying Information Law	Agency contractor employee inadvertently emailed client information to an improper recipient. The agency confirmed that the improper recipient deleted the client information and is notifying the affected clients.



Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently forwarded client information to an improper recipient. The agency notified the affected client and deleted the information.
Disclosure in Violation of the Identifying Information Law	Agency contractor reported data security incident affecting agency system containing client information. The agency contractor has engaged relevant authorities and the investigation remains ongoing. The agency contractor will notify any affected individual.
Disclosure in Violation of the Identifying Information Law	Agency inadvertently made sensitive employee information in its database available to more internal users than intended. The agency reported removing the sensitive employee information from the database and audited the database's access records to determine what sensitive employee information was viewed by unauthorized internal users. The agency notified the affected users.
Disclosure in Violation of the Identifying Information Law	Agency emailed client information to an unintended third party instead of to the client. The agency determined that the client's representative had provided an incorrect email address. The agency corrected the email address, requested that the incorrect recipient destroy the information, and is notifying the affected client.

Submitted by: Laura Negron (Dec 20, 2021 16:02 EST)

Laura Negrón Chief Privacy Officer, City of New York

Date: December 20, 2021