

FORM 3 (AGENCY REPORT) (Due on or before July 31, 2022)

Agency:	The Office of Brooklyn Borough President Antonio Reynoso		
Agency Privacy Officer:	Corina M. Lozada, Esq.		
Email:	Corina.lozada@brooklynbp.nyc.gov	Telephone:	718-802-3883
Date of Report:	8/2/2022		

1. Specify the type of identifying information collected or disclosed (check all that apply):	
<input checked="" type="checkbox"/> Name <input checked="" type="checkbox"/> Social security number (full or last 4 digits)* <input type="checkbox"/> Taxpayer ID number (full or last 4 digits)*	<u>Work-Related Information</u> <input checked="" type="checkbox"/> Employer information <input checked="" type="checkbox"/> Employment address
<u>Biometric Information</u> <input checked="" type="checkbox"/> Fingerprints <input type="checkbox"/> Photographs <input type="checkbox"/> Palm and handprints* <input type="checkbox"/> Retina and iris patterns* <input type="checkbox"/> Facial geometry* <input type="checkbox"/> Gait or movement patterns* <input type="checkbox"/> Voiceprints* <input type="checkbox"/> DNA sequences*	<u>Government Program Information</u> <input type="checkbox"/> Any scheduled appointments with any employee, contractor, or subcontractor <input type="checkbox"/> Any scheduled court appearances <input type="checkbox"/> Eligibility for or receipt of public assistance or City services <input type="checkbox"/> Income tax information <input type="checkbox"/> Motor vehicle information
<u>Contact Information</u> <input checked="" type="checkbox"/> Current and/or previous home addresses <input checked="" type="checkbox"/> Email address <input checked="" type="checkbox"/> Phone number	<u>Law Enforcement Information</u> <input type="checkbox"/> Arrest record or criminal conviction <input type="checkbox"/> Date and/or time of release from custody of ACS, DOC, or NYPD <input type="checkbox"/> Information obtained from any surveillance system operated by, for the benefit of, or at the direction of the NYPD
<u>Demographic Information</u> <input checked="" type="checkbox"/> Country of origin <input checked="" type="checkbox"/> Date of birth* <input type="checkbox"/> Gender identity <input type="checkbox"/> Languages spoken <input type="checkbox"/> Marital or partnership status <input type="checkbox"/> Nationality <input type="checkbox"/> Race <input type="checkbox"/> Religion <input type="checkbox"/> Sexual orientation	<u>Technology-Related Information</u> <input type="checkbox"/> Device identifier including media access control MAC address or Internet mobile equipment identity (IMEI)* <input type="checkbox"/> GPS-based location obtained or derived from a device that can be used to track or locate an individual* <input type="checkbox"/> Internet protocol (IP) address* <input type="checkbox"/> Social media account information
<u>Status Information</u> <input type="checkbox"/> Citizenship or immigration status <input type="checkbox"/> Employment status <input type="checkbox"/> Status as victim of domestic violence or sexual assault <input type="checkbox"/> Status as crime victim or witness	
<u>Other Types of Identifying Information</u> (list below): <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	
<small>*Type of identifying information designated by the CPO (see CPO Policies & Protocols § 3.1.1).</small>	

3. Describe the following types of collections and disclosures: (1) pre-approved as routine, (2) pre-approved as routine by the APOs of two or more agencies, or (3) approved by the APO on a case-by-case basis. Appendix B of the Agency Guidance on the 2022 Biennial Compliance Process includes examples of routine and non-routine collections and disclosures.

Add additional rows as needed.

Describe the Collection or Disclosure	Classification Type
Collection of personal, biometric, and/or demographic information of new hires to DCAS as required	<input checked="" type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input type="checkbox"/> Approved by APO on a case-by-case basis
We collect the contact information of Constituents regularly. We sometimes send Constituent contact information to other Agencies like NYCHA during advocacy when a Constituent brings an issue to us.	<input type="checkbox"/> Pre-approved as routine <input type="checkbox"/> Approve as routine by two or more agencies <input checked="" type="checkbox"/> Approved by APO on a case-by-case basis

N.Y.C. Admin. Code §23-1205(a)(1)(b)

2. Explain why the collection and retention of identifying information described in Question 1 furthers the purpose or mission of your agency.

-The information checked is all information that the City of New York requires each City agency to collect and when we disclose this information it is either to DCAS for processing or through the many databases that the City uses to track the information.

-When we receive requests from constituents of Brooklyn to advocate on their behalf at times we must disclose identifying information with the Constituent's permission to other agencies, such as NYCHA.

-The Budget department accesses vendor information from FMS and/or Passport, this information is not disclosed.

N.Y.C. Admin. Code §23-1205(a)(1)(f)

4. If applicable, describe the types of collections and disclosures of identifying information involving your agency that have been approved by the Chief Privacy Officer as being in the best interests of the City.

Add additional rows as needed.

Describe Type of Collection or Disclosure

N/A

5. Describe the agency's current policies regarding requests for disclosures from other City agencies, local public authorities or local public benefit corporations, and third parties. Be as specific as possible.

NOTE: For questions 5 – 11, refer as necessary to the Model Citywide Protocol for Handling Third Party Requests for Information Held by City Agencies (on file with the Office of Information Privacy) and the Identifying Information Rider.

Any requests are brought to the Agency Privacy Officer for determination of whether disclosure is permissible i.e., as routine, on case-by-case basis pursuant to the law or in the best interest of the City. For routine disclosures, the agency simply keeps track, but for case by case inquiries the Agency Privacy Officer determines whether disclosure should be made

6. Do the above policies address access to or use of identifying information by employees, contractors, and subcontractors? Yes No

7. If YES, do those policies specify that access to identifying information must be necessary to perform their duties? Yes No

8. Describe whether the policies are implemented in a manner that minimizes access to the greatest extent possible while furthering the purpose or mission of the agency.

Depending on the type of collection, it is only accessible to the department that needs the information to perform its duties. For example, the personal identifying information of new hires is maintained and accessible only by HR. The personal identifying information of constituents is maintained and kept by Constituent Affairs.

9. Describe the agency's current policies for handling proposals for disclosures of identifying information to other City agencies, local public authorities or local public benefit corporations, and third parties. Be as specific as possible.

The Agency determines whether the proposal is a FOIL request to be handled by the FOIL Officer, if not we utilize the protocol described above to determine on a case-by-case basis whether the disclosure should be made.

10. Describe the agency's current policies regarding the classification of disclosures as necessitated by the existence of exigent circumstances or as routine. Be as specific as possible.

Routine disclosures are those disclosures that happen on a regular basis.

Exigent circumstances are rare occasions that may be necessary or warranted based on the facts at hand, ex. Fire or police investigation.

N.Y.C. Admin. Code §23-1205(a)(1)(c)(3)

11. Describe the agency's current policies regarding which divisions and categories of employees have been approved by the agency privacy officer to disclose identifying information. Be as specific as possible.

Only those departments that must collect identifying information may in order to conduct its job duties may collect and disclose on a regular basis such as: HR, Counsel's Office (including FOIL), IT, Constituent Services, and Programs

N.Y.C. Admin. Code §23-1205(a)(1)(c)(4)

12. Describe whether the agency has considered or implemented, where applicable, any alternative policies since 2020 that minimize the collection, retention, and disclosure of identifying information to the greatest extent possible while furthering the agency's purpose or mission.

Because this is a new administration, it is unclear how the last administration collected or disclosed information in 2020, other than routine collections/disclosures.

N.Y.C. Admin. Code §23-1205(a)(4)

13. Describe the agency's use of agreements for any use or disclosure of identifying information.

Agency only collects identifying information that is necessary to effectuate its work and most disclosures are routine disclosures or required by law. Any disclosures made on a case-by-case basis is made with the knowledge of the person or in exigent circumstances, as approved by the privacy officer.

N.Y.C. Admin. Code §23-1205(a)(1)(d)

14. Using the table below, describe the types of entities requesting the disclosure of identifying information or proposals for disclosures of identifying information. For each entity, describe (1) why the agency discloses identifying information to the entity, and (2) why any disclosures further the purpose or mission of the agency.

Add additional rows as needed.

Type of Entity	Description of Reason for Disclosure	Description of how disclosure furthers the agency's purpose or mission
DCAS	Personnel information	Processing of employees
City of New York	Budget/Vendor Information	Registration of Contracts/Expenditure of Govt Funds
City Comptroller's Office	Contracts/Vendor Information	Registration of Contracts and Grants of Discretionary Funding

N.Y.C. Admin. Code §23-1205(a)(1)(e)

- Proceed to Next Question on Following Page -

15. Describe the impact of the Identifying Information Law and other local, state, or federal laws upon your agency's practices in relation to collecting, retaining, and disclosing identifying information (i.e., if such practices would differ in the absence of these laws).

Most collections and disclosures are due to City and legal requirements such as City databases and the Freedom of Information

N.Y.C. Admin. Code §23-1205(a)(2)

16. Describe the impact of the privacy policies and protocols issued by the Chief Privacy Officer, or by the Citywide Privacy Protection Committee, as applicable, upon your agency's practices in relation to collecting, retaining, and disclosing identifying information (i.e., if they have affected such practices).


N.Y.C. Admin. Code §23-1205(a)(3)

APPROVAL SIGNATURE FOR AGENCY REPORT

Preparer of Agency Report:

Name:	Corina M. Lozada, Esq.		
Title:	Deputy General Counsel/Agency Privacy Officer		
Email:	Corina.lozada@brooklynbp.nyc.gov	Phone:	718-802-3883

ELECTRONIC SIGNATURE OF AGENCY HEAD OR DESIGNEE REQUIRED BELOW

Agency Head (or designee):			
Name:	Asher Freeman		
Title:	Chief of Staff		
Email:	asher.freeman@brooklynbp.nyc.gov	Phone:	718-802-3757
Electronic Signature:		Date:	4/6/2022

— End of Document —