

## FORM 3 (AGENCY REPORT)

### (Due on or before July 31, 2022)

<b>Agency:</b>	Taxi & Limousine Commission		
<b>Agency Privacy Officer:</b>	Ewa Sromeke		
<b>Email:</b>	sromeke@tlc.nyc.gov	<b>Telephone:</b>	212-676-1208
<b>Date of Report:</b>	July 5, 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 checked="" type="checkbox"/> Taxpayer ID number (full or last 4 digits)*	<p><b><u>Work-Related Information</u></b></p> <input checked="" type="checkbox"/> Employer information <input checked="" type="checkbox"/> Employment address
<p><b><u>Biometric Information</u></b></p> <input checked="" type="checkbox"/> Fingerprints <input checked="" 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*	<p><b><u>Government Program Information</u></b></p> <input type="checkbox"/> Any scheduled appointments with any employee, contractor, or subcontractor <input type="checkbox"/> Any scheduled court appearances <input checked="" type="checkbox"/> Eligibility for or receipt of public assistance or City services <input checked="" type="checkbox"/> Income tax information <input checked="" type="checkbox"/> Motor vehicle information
<p><b><u>Contact Information</u></b></p> <input checked="" type="checkbox"/> Current and/or previous home addresses <input checked="" type="checkbox"/> Email address <input checked="" type="checkbox"/> Phone number	<p><b><u>Law Enforcement Information</u></b></p> <input checked="" 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
<p><b><u>Demographic Information</u></b></p> <input checked="" type="checkbox"/> Country of origin <input checked="" type="checkbox"/> Date of birth* <input checked="" type="checkbox"/> Gender identity <input checked="" type="checkbox"/> Languages spoken <input checked="" type="checkbox"/> Marital or partnership status <input type="checkbox"/> Nationality <input checked="" type="checkbox"/> Race <input type="checkbox"/> Religion <input type="checkbox"/> Sexual orientation	<p><b><u>Technology-Related Information</u></b></p> <input type="checkbox"/> Device identifier including media access control MAC address or Internet mobile equipment identity (IMEI)* <input checked="" 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
<p><b><u>Other Types of Identifying Information</u></b> (list below):</p> <p>1) <u>Licensing Division</u>: Ethnicity, Country of Citizenship &amp; Place of Birth is collected.</p> <p>2) <u>Education Division</u> collects information as to whether or not the student passed the course. The education providers do not adhere to a uniform policy, but certain of the education providers collect: a) name; b) DMV number; c) TLC license number; d) a copy of the student's photo identification; e) email; f) language preference. None of this information is disclosed by the education providers. These collections are routine.</p> <p>3) <u>Enforcement Division</u>: Date, time, place of occurrence of violation and description of violation. This is collected, retained, and disclosed in certain instances.</p> <p>4) <u>Legal Affairs</u>: Photos/videos/documents, which we collect/retain/discard.</p>	

**Identifying Information Law**

\*Type of identifying information designated by the CPO (see CPO Policies & Protocols § 3.1.1).

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

The purpose of our agency is as described in the New York City Charter, Chapter 65, Section 2303: the regulation and supervision of the business and industry of transportation of persons by licensed vehicles for hire in the City. Such regulation and supervision shall extend to:

1. The regulation and supervision of rates of fare to be charged and collected.
2. The regulation and supervision of standards and conditions of service.
3. The revocation and suspension of licenses for vehicles, other than licenses issued pursuant to state law, provided, however, that taxicab licenses represented by medallions heretofore issued shall in all respects remain valid in accordance with their terms and transferable according to law.
4. Taxicab licenses represented by medallions which have heretofore been surrendered are hereby revoked. Additional taxicab licenses may be issued from time to time only upon the enactment of a local law providing therefor. Any nontransferable licenses shall be deemed revoked upon the surrender by or death of the holder thereof.
5. The issuance, revocation, suspension of licenses for drivers, chauffeurs, owners or operators of vehicles, other than licenses issued pursuant to state law, and for taxicab brokers and the establishment of qualifying standards required for such licensees.
6. Requirements of standards of safety, and design, comfort, convenience, noise and air pollution control and efficiency in the operation of vehicles and auxiliary equipment.
7. Requirements for the maintenance of financial responsibility, insurance and minimum coverage.
8. The establishment of, and the requirement of adherence to, uniform system of accounts, with the right of the commission to inspect books and records and to require the submission of such reports as the commission may determine.
9. The development and effectuation of a broad public policy of transportation affected by this chapter as it relates to forms of public transportation in the city, including innovation and experimentation in relation to type and design of equipment, modes of service and manner of operation, which for limited purposes and limited periods of time may depart from the requirements otherwise established for licensed vehicles pursuant to this chapter.
10. Assistance to the business and industry of public transportation affected by this chapter in aid of the continuation, development and improvement of service and the safety and convenience of the public, including assistance in securing federal and state grants.
11. The formulation, promulgation and effectuation of rules and regulations reasonably designed to carry out the purposes, terms and provisions of this chapter.

The collections and disclosures of the Education, Enforcement, Finance, Legal, Licensing, Information Technology (MIS), Personnel/Human Resources, Public Affairs, Policy, Programs and Safety & Emissions Divisions all further the mission of the Taxi & Limousine Commission. The rationale for each division's collections and disclosures are explained in Box 3, below.

N.Y.C. Admin. Code §23-1205(a)(1)(f)

**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
<p>The <b>Education Division</b> oversees the TLC-authorized providers of driver education courses. The unit also oversees the vendor that administers exams at separate locations throughout the city.</p> <p>These education providers do not adhere to a uniform policy, but certain of the education providers collect: 1) name; 2) DMV number; 3) TLC license number; 4) a copy of the student's photo identification; 5) email; 6) language preference. None of this information is disclosed. These collections have been pre-approved as routine.</p> <p>The test vendor receives the following information about each applicant that is eligible to take the exam: 1) name; 2) DMV #; 3) TLC application#.</p> <p>Each applicant registers for the exam on the vendor's online platform. When the driver arrives at the testing facility, the test vendor also takes a picture of the applicant's government issued ID and their electronic signature. They retain these records.</p> <p>After the applicant completes the exam, the test vendors transmit the test data to the TLC via secure file transfer. These collections have been pre-approved as routine.</p> <p>The Education Division has disclosed identifying information in response to suspected fraud that occurred at a series of examinations for licensees. In response, the Education Division provided certain identifying information to the New York State Office of the Inspector General, to the New York City Department of Investigation and to the Office of Administrative Trials and Hearings. Disclosure in response to such requests have been preapproved as routine.</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine</p> <p><input type="checkbox"/> Approve as routine by two or more agencies</p> <p><input type="checkbox"/> Approved by APO on a case-by-case basis</p>
<p>The <b>Enforcement Division of the Uniformed Services Bureau</b> collects information from any individual that is the subject of a summons, notice of violation, or arrest. Information is also collected after base inspections and field inspections. This information is typically contained in a summons and/or a memo book of the issuing TLC officer.</p> <p>Typical information that is gathered includes the individual's name, date of birth, the make and model of the vehicle that was being operated at the time of summons, and the address of the individual.</p> <p>We disclose the information collected when issuing the summons when we cooperate with TLC's prosecution and legal divisions and when we testify before hearings at OATH.</p> <p>We also disclose certain information through our Investigations sub-division, a unit that is dedicated to assisting other law enforcement agencies as they pursue criminal investigations. The other enforcement agencies that we work with include the NYPD, the Port Authority of New York and New Jersey, the Metropolitan Transportation Authority Police and the Sherriff's Office. The data that we would disclose to such an organization, in furtherance of their investigation, would include licensee contact information and/or data generated by the taxicab technology system that is installed in yellow and green taxis. We also disclose credit card information to aid in fraud investigations.</p> <p>Certain data is also collected by cameras that are installed in the vehicles operated by TLC officers. For example, that camera could record the license plate of a vehicle that has been pulled over by a TLC officer.</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine</p> <p><input type="checkbox"/> Approve as routine by two or more agencies</p> <p><input type="checkbox"/> Approved by APO on a case-by-case basis</p>

**Identifying Information Law**

<p>These collections and disclosures have been pre-approved as routine.</p> <p>The <b>Office of Financial Administration</b> collects the following information for the purposes of purchasing goods or services and processing payments: 1) Name. 2) Current/previous home and work addresses. 3) Contact information such as phone number and email address. 4) Social security numbers and/or tax identification numbers (as needed to process payments).</p> <p>In some instances, the following information may also be gathered:</p> <p>1) Gender identity and race may be gathered in our work with Minority and Women Owned Business Enterprise firms. In practice, we only confirm if a vendor is registered as an MWBE, rather than specifically asking the owner's gender or race.</p> <p>2) Motor vehicle information or license plate number information would be considered TLC licensing data. We access this information in the management of accessibility programs, such as Taxicab Improvement Fund and Citywide Accessible Dispatch.</p> <p>3) Arrest record or criminal conviction may come up in the course of a vendor background check.</p> <p>Finance disclosures: we would not have significant concern sharing vendor information that is available publicly such as name, work address, and contact information. We would also share whether a firm is a registered Minority and Women Owned Business Enterprise or if they offer a particular area of expertise, such as language translation.</p> <p>The TLC Business Practices Accountability Unit (BPAU) is dedicated to the oversight of broker and business practices that affect TLC licensees. Based on local law, BPAU requires information on the business interests of certain TLC licenses (brokers, agents) and the affiliated businesses of medallion brokers.</p> <p>These collections and disclosures have been pre-approved as routine.</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine</p> <p><input type="checkbox"/> Approve as routine by two or more agencies</p> <p><input type="checkbox"/> Approved by APO on a case-by-case basis</p>
<p>The Prosecution Unit of the <b>Office of Legal Affairs</b> collects information from passengers and members of the public that file complaints against the TLC's licensees. In processing those complaints, the Prosecution Unit collects personal identifying information from both the complainant and from the licensee that is the subject of the complaint. That information is stored in the agency's Electronic Summoning and Administration Program.</p> <p>Legal Affairs also collects personal information when:</p> <p>1) a licensee applies for a grant under our Agency's Accessibility program (a program through which we incentivize drivers to provide rides in vehicles that can be used by passengers reliant on a wheelchair). In processing a grant application, TLC collects: name, address, contact info, VIN, Plate#, SSN/TIN/EIN. The Department of Finance receives name, address, contact info, SSN/TIN/EIN, banking info;</p> <p>2) when we assist with medallion foreclosure auctions, we provide info related to the Medallion only: Taxi Improvement Fund amounts owed, Open Items (summons, penalties, etc.), License Expiration Date, Type of Medallion;</p> <p>3) when entering into contracts and certain data-sharing agreements;</p> <p>4) when prosecuting and settling consumer complaints (since the lockdown caused by COVID-19, we have started requesting for the copy of TLC driver's license or the OMV chauffeur's license of the respondent before settling cases);</p> <p>5) when seizing vehicles;</p> <p>6) when taking comments from the public. Those comments (and records created by members of the public that testify at agency hearings) are collected and made public pursuant to the City Administrative Procedure Act;</p> <p>7) when reviewing requests for vehicle retirement extensions.</p> <p>Legal Affairs discloses and retains various records: 1) in response to litigation efforts;</p> <p>2) in response to information requests under FOIL;</p> <p>3) in response to subpoenas (governed by the CPLR);</p> <p>4) at Office of Administrative Trials Hearing; and to the Department of Investigation and the</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine</p> <p><input type="checkbox"/> Approve as routine by two or more agencies</p> <p><input type="checkbox"/> Approved by APO on a case-by-case basis</p>

<p>New York Police Department in response to their investigations;  5) pursuant to City Administrative Procedure Act;  6) proceedings before the Office of Labor Relations/Office of Collective Bargaining.  7) in response to other law enforcement and regulatory agencies such as the FBI, NYPD, the Special Commissioner's Office (NYC DOE) and others.</p> <p>Legal Affairs also provides the disciplinary histories of TLC Enforcement Personnel who may be required to testify in criminal proceedings. These disclosures are only made in response to requests from ADAs and pursuant to the Discovery Laws that took effect on 1/1/20.</p> <p>The collections and disclosures described above have been pre-approved as routine.</p>	
<p>The <b>Licensing and Standards Division</b> collects: Name, SSN/TIN/EIN, gender identity, languages spoken, race, motor vehicle information/license plate number, fingerprints, photographs, country of origin, place of birth, current/previous home and work addresses, phone number, email address, scheduled court appearances for TLC personnel, certain child support information.</p> <p>Licensing information is also disclosed by making it publicly available on OpenData and our website. Certain licensing information is also disclosed to the Office of Child Support Enforcement, Department of Motor Vehicles, New York City Human Resources Administration, to City Hall, to the New York State Department of Health, to LabCorp (private entity that performs drug testing of licensees), to the Redlight Camera Program (program to catch drivers that run red lights), to the New York State Department of Taxation, to Creative Mobile Technologies and Verifone (providers of taxicab technology systems that allow meters, among other things, to function in taxis) and the New York State Department of Motor Vehicles.</p> <p>The Call Center will in certain circumstances take the contact information of a passenger that has lost property in a taxicab or Street Hail Livery. This contact information is never disclosed.</p> <p>Licensing has partnered with a private company, Canadian Bank Note (CBN), in order to outsource and expedite the printing of licenses for our licensed Drivers. The data is shared with CBN and used solely for the purpose of printing licenses. CBN has information from the DMV (the licensee's photo) and links that PII with information from TLC in order to print the licenses.</p> <p>Licensing gathered PII in response to the Mayor's Executive Order 45, dated May 8, 2019, in order to prepare its Social Indicators Report. This data is not disclosed except as needed to the Mayor's Office of Operations.</p> <p>These collections and disclosures have been pre-approved as routine.</p>	<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
<p>The <b>Management Information Systems Division</b> discloses information to the NYC Human Resource Administration for purposes of child welfare enforcement efforts.</p> <p>It discloses certain vehicle trip sheet data to the Office of the Inspector General of the Metropolitan Transit Authority for the purposes of investigating Medicaid fraud.</p> <p>It discloses information to the Law Department that details individuals that owe the TLC a monetary debt.</p> <p>It discloses to the New York State Department of Taxation and Finance to help the state collect taxes.</p> <p>MIS processes licensee PII trip data that Policy and Legal specified and required via the Agency rulemaking process. The proper collection and storage of that data supports the Agency's cloud initiative. After ensuring its proper collection, MIS places that PII data on the</p>	<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

**Identifying Information Law**

<p>Microsoft Azure portal on behalf of the agency.</p> <p>In addition to supporting Policy and Legal, MIS also works with Licensing to ensure the proper collection and retention of data that Licensing collects from licensees (e.g. storing licensee data on Salesforce). MIS performs this support function across Agency divisions.</p> <p>Further, MIS maintains the servers and the equipment used to retain all agency data. MIS adjusts the retention of that data/PH based on consultation with Legal and the needs of the respective divisions.</p> <p>These disclosures have been ore-approved as routine.</p>	
<p>The <b>Human Resources Division</b> collects: 1) Name. 2) Race. 3) Marital or Partnership Status. Eligibility/receipt of public assistance or city services. 4) Motor Vehicle Information or license plate number. 5) Fingerprints and photographs. 6) Languages spoken. 7) Place of birth. 8) Arrest record or criminal conviction. 9) Employment status. 10) Current and previous home and 11) phone number/email address.</p> <p>This information would be disclosed for any of the following reasons: trainings, court mandated requests, verification requests; at the request of the Federal or State Equal Employment Opportunity Agencies; information provided for health plans and pension benefits; information released to the NYC Department of Citywide Services for waiver of processing fees; where mandated by Law; released for purposes of Peace Officer status.</p> <p>These collections and disclosures have been pre-approved as routine.</p>	<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
<p>The TLC's <b>Office of Public Affairs</b> supports the agency by taking the lead on social media monitoring and content, and reviewing/approving web content. Primarily, however, Public Affairs interacts with all forms of media, and acts as liaison to the Mayor's Press Office. Public Affairs helps ensure the agency's transparency through the dissemination of accurate and relevant public information, and the facilitation of its public posting.</p> <p>Public Affairs collects no data of its own and relies on its fellow agency divisions to provide data for research or potential use in a response to a member of the media. Data requested by Public Affairs varies widely and is most often requested in response to media request. Some popular examples include license status for individuals accused of crimes or involved with crashes, licensing photos of same, trip data, and agency performance statistics.</p> <p>These disclosures have been pre-approved as routine.</p>	<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
<p>The <b>Office of Policy and External Affairs</b> oversees the collection of trip data from the following four industries:</p> <ol style="list-style-type: none"> <li>1) Yellow Taxi (MED)</li> <li>2) Street Hail Livery (SHL)</li> <li>3) For-Hire Vehicle (FHV)</li> <li>4) High Volume For-Hire Vehicle (HVFHV)</li> </ol> <p>For Yellow Taxi, Street Hail Livery, and High Volume For-Hire Vehicle industries, TLC collects the following trip information:</p> <ol style="list-style-type: none"> <li>1) The date, the time, and the location of the passenger pickup and drop-off</li> <li>2) The driver's TLC driver's license number (hack number)</li> <li>3) The dispatched Vehicle's license number (medallion or permit numbers)</li> <li>4) Trip time in seconds and trip distance in miles</li> <li>5) The date and time the passenger requested the trip (HVFHV only)</li> <li>6) The TLC license number of the For-Hire Base that dispatched the Vehicle (HVFHV only)</li> <li>7) The TLC License number of the For-Hire Base affiliated to the dispatched Vehicle (HVFHV only)</li> <li>8) Whether the passenger is sharing the Vehicle for part or all of the trip with a passenger</li> </ol>	<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

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<p>from another dispatched call (HVFHV only)</p> <ol style="list-style-type: none"> <li>9) Detailed fare information, including base fare, fees, taxes, tools, and tips</li> <li>10) The payment the driver received for the trip (HVFHV only)</li> <li>11) The data that reflects entrance of the Congestion Zone</li> <li>12) Access-a-Ride flag (HVFHV only), Wheelchair Accessible Vehicle flag (HVFHV only)</li> </ol> <p>For For-Hire Vehicle, the TLC requires that each FHV base collect and transmit to the TLC the following information for each trip dispatched by an FHV base:</p> <ol style="list-style-type: none"> <li>1) The date, the time, and the location of the passenger pickup and drop-off</li> <li>2) The driver's TLC driver's license number</li> <li>3) The dispatched Vehicle's license number</li> <li>4) The TLC license number of the For-Hire Base that dispatched the Vehicle</li> <li>5) The TLC License number of the For-Hire Base affiliated to the dispatched Vehicle</li> <li>6) Whether the passenger is sharing the Vehicle for part or all of the trip with a passenger from another dispatched call</li> </ol> <p>This data, once collected by TLC, is not disclosed except in instances in which it has been aggregated. Such aggregated data is generally disclosed for the purposes of various industry reports and public-facing dashboards. This data has also been used when performing Environmental Impact Studies that were demanded by local law. This data may also be disclosed in response to a request from law enforcement or FOIL statute, as noted above.</p> <p>The Policy Division also, at times, discloses identifying information pursuant to data sharing agreements. Such disclosures are made during the normal course of city agency business and furthers the purpose of the TLC. These disclosures have been pre-approved as routine.</p>	
<p><b>The Programs Division</b> runs six programs.</p> <p><u>The Taxi Improvement Fund Team</u> disburses funds that have been set aside for drivers and vehicle owners that use wheelchair accessible vehicles. In order to receive these funds, program participants must submit certain demographic and contact information to the TLC, which Programs checks against existing TLC records. All applicants submit their name, contact information, license number, and SSN/TIN. In addition, vehicle owners/agents must submit their banking information (routing number, account number) to Bank of America to receive payment by direct deposit. For drivers, the bank generates a debit card file for each participant that includes the participant's name, social security number/tax identification number, account and card number, and hack/license number. This information is never disclosed.</p> <p>As part of the enrollment process, TLC re-submits the name, medallion number and social security number or tax identification number to the NYC Department of Finance and Comptroller to verify the information and to check for outstanding debt.</p> <p>The Programs team also includes the following program participant data in a monthly update to OpenData: 1) medallion owners and agents that are participating, 2) medallions that are participating in the TIF program and 3) the dollar amount disbursed under the Taxi Improvement Fund program.</p> <p><u>The Accessible Dispatch Team</u>: Pursuant to contract with Medical Transportation Management, the Accessible Dispatch team collects passenger data, including name and phone number, for riders requesting accessible taxis through the program. Further, the Mayor's Office for People with Disabilities and the NYC Office of Emergency Management have asked for contact information of base and medallion owners that participate in this program.</p>	<p><input checked="" type="checkbox"/> Pre-approved as routine</p> <p><input type="checkbox"/> Approve as routine by two or more agencies</p> <p><input type="checkbox"/> Approved by APO on a case-by-case basis</p>

<p><u>The Access-A-Ride Partnership:</u> Data sharing occurs with MTA AAR to resolve consumer complaints lodged by AAR participants that used a taxicab for transportation under an MT A AAR pilot program. The name and contact information of both passenger and driver could be shared between agencies as resolution of the complaint is sought. Certain trip data is collected from taxicab technology providers in order to help with the resolution of these complaints.</p> <p><u>For-Hire Vehicle Accessibility:</u> The TLC collected name and contact information of applicants that applied to serve as Wheelchair Accessible Vehicle Dispatchers.</p> <p><u>The Driver Resource Center:</u> Provides financial and mental health resources to our licensees. It collects name and demographic information of drivers and medallion owners that scheduled an appointment through the Driver Resource Center. The TLC partners with the Department of Consumer and Worker Protection and their vendors to provide financial counseling and legal services for TLC drivers and medallion owners. Our partners have access to demographic information, but it is not shared outside TLC's scheduling system</p> <p><u>The Medallion Relief Program Team</u> processes grants to eligible medallion owners who are struggling with medallion debt. In order to receive a grant, medallion owners submit their name, contact information, license number, and SSN/TIN. TLC staff checks this information against existing TLC records. Pursuant to a contract with vendor, details on medallion loans, such as the name of the lender, the original and current unpaid principal balance, and interest rates, are also collected in a web-based portal (Cirrus) through which grant payments are reviewed and approved for payment.</p> <p>These collections and disclosures have been pre-approved as routine.</p>	
<p>The <u>Safety and Emissions Division of the Uniformed Services Bureau</u> generates and then collects vehicle inspection records. It discloses in response to subpoenas or other requests from the Legal division.</p> <p>These collections and disclosures have been pre-approved as routine.</p>	<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

N.Y.C. Admin. Code §23-1205(a)(1)(b)

<p><b>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.</b></p>	
<p>Add additional rows as needed.</p>	
<p><b>Describe Type of Collection or Disclosure</b></p>	
<p>Not Applicable.</p>	

N.Y.C. Admin. Code §23-1202(b)(2)(b); 23-1205(a)(1)(b)



**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.**

The agency follows the Model Protocol for handling third party requests for information held by City agencies.

**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.**

The agency utilizes secure data transfer methods to ensure confidentiality.

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

**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 reviews whether it is an appropriate use of agency resources and of the data requested, and whether the data requested is restricted from disclosure because of federal, state or city law.

N.Y.C. Admin. Code §23-1205(a)(1)(c)(2)

**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.**

The term "exigent" has a component of urgency or immediacy. Such exigent circumstances are usually part of a law enforcement request or compliance with a subpoena. The agency approval of all other requests would be as routine.

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.**

The agency has an organizational chart with a number of bureaus and divisions, each with a managerial structure. Deputy Commissioners, Assistant Commissioners, and Directors oversee employees and make decisions affecting the agency and disclosure of identifying information following the approval of the Office of Legal Affairs and the privacy officer.

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.**

TLC collects, retains and discloses identifying information when necessary; we do not seek to "over collect." We retain in accordance with the guidelines set by the NYC Office of Records and Information Services; litigation preservation orders; and anticipated litigation.

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.**

TLC utilizes contracts, memorandum of understanding and non-disclosure agreements to control the disclosure of information to vendors and to other government agencies and ensure confidentiality.

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
Other city agencies	To further the mission of one or both of the agencies.	TLC maintains electronic trip data for vehicles for hire; other agencies have found the data useful for transportation planning initiatives. We also exchange data with other agencies for enforcement and investigative purposes.
Members of the public	Open government; majority of requests handled under FOIL. Non-FOIL requests that are granted relate to studies undertaken that can provide benefits to the agency.	TLC maintains electronic trip data for vehicles for hire; the data can be used in interesting studies by academics and the results are shared with TLC. Such studies can be useful for policy planning.
Law enforcement	Public protection.	TLC is a licensing and enforcement agency.
Vendors (for goods, services, and consultants)	In order for the vendor to complete the contract deliverables.	Vendor may not be able to fully perform the deliverables without TLC providing identifying information. TLC needs vendors to provide services to support the agency mission.
Insurance providers	To ensure licensed vehicles for hire are properly insured.	Public safety; ensure that only those vehicles for hire that are properly insured are on the road.
Members of the press	Public interest.	TLC provides driver identifying information when it is appropriate, such as after an accident and the driver or vehicle number has been identified by law enforcement, or when a driver has done something noteworthy and we want to call attention to a great driver.

N.Y.C. Admin. Code §23-1205(a)(1)(e)

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**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).**

Not a huge impact; the Law serves as a reinforcement of policies and reviews that we had in place prior to collection, retention, and disclosure of identifying 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).**

Not applicable.

N.Y.C. Admin. Code §23-1205(a)(3)

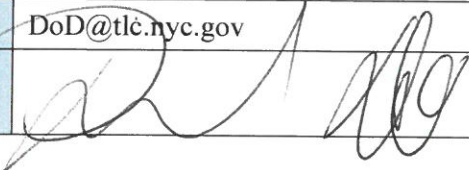
**APPROVAL SIGNATURE FOR AGENCY REPORT**

**Preparer of Agency Report:**

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**ELECTRONIC SIGNATURE OF AGENCY HEAD OR DESIGNEE REQUIRED BELOW**

**Agency Head (or designee):**

<b>Name:</b>	David Do		
<b>Title:</b>	Commissioner/Chair		
<b>Email:</b>	DoD@tlc.nyc.gov	<b>Phone:</b>	212-676-1003
<b>Electronic Signature:</b>		<b>Date:</b>	07/06/2022

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