

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

**Reporting Period: March 16, 2023 through June 15, 2023**

\*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 agency collections and disclosures of identifying information made under exigent circumstances or in violation of the Identifying Information Law to the Speaker of the City Council.

Description	Total
<b>Total number of collections and disclosures of identifying information reported by agencies made under exigent circumstances:</b> (N.Y.C. Admin. Code § 23-1202(d))	0
<b>Total number of disclosures of identifying information reported by agencies made in violation of the Identifying Information Law:</b> (N.Y.C. Admin. Code § 23-1202(c)(4))	27

For the reporting period March 16, 2023, through June 15, 2023, City agencies and offices have reported collections and 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 (2)	In two instances, agency employees inadvertently emailed client identifying information to third parties. The agencies instructed the third parties to delete the emails and notified the affected clients.
Disclosure in Violation of the Identifying Information Law	Agency contractor inadvertently mailed client identifying information to the wrong client. The contractor notified the affected individual and told the recipient to delete the identifying information.
Disclosure in Violation of the Identifying Information Law (3)	In three instances, agency employees inadvertently sent client identifying information to the wrong agency clients. The agency notified the clients whose identifying information was inadvertently disclosed.
Disclosure in Violation of the Identifying Information Law (2)	In two instances, agency employees inadvertently sent the wrong client's identifying information to another agency. The receiving agencies deleted the identifying information.
Disclosure in Violation of the Identifying Information Law	Agency contractor inadvertently emailed client identifying information to the wrong clients. The contractor notified the affected clients and instructed the recipients to delete the identifying information.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently emailed client identifying information to a third party. The third party confirmed that the email containing client identifying information was deleted.
Disclosure in Violation of the Identifying Information Law	Agency inadvertently sent client identifying information to a third party. The third party notified the agency and confirmed that the information was destroyed.
Disclosure in Violation of the Identifying Information Law (4)	In four instances, agency vendors experienced cyber events which yielded possible disclosures of identifying information. The agencies are working with the vendors to investigate and engage in remediation.

Disclosure in Violation of the Identifying Information Law	Agency employee sent clients' identifying information to a third party in violation of agency policy. The agency instructed the third party to delete the information and to confirm deletion. The agency will notify the affected clients.
Disclosure in Violation of the Identifying Information Law	Agency inadvertently mailed an unsealed envelope to a client containing the client's identifying information. The agency corrected a mechanical issue in its mailroom that caused the envelope to be unsealed and notified the affected client.
Disclosure in Violation of the Identifying Information Law	Agency employee removed identifying information in violation of agency policy. The employee returned the identifying information to the agency and certified that they destroyed all identifying information in their possession.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently disclosed identifying information to third parties. The third parties deleted the information.
Disclosure in Violation of the Identifying Information Law	Agency vendor's online platform inadvertently disclosed non-client information to agency clients. The agency is investigating and reviewing remediation steps.
Disclosure in Violation of the Identifying Information Law	Agency vendor experienced a cyber event that disclosed current and former employee and contractor identifying information. The agency remediated the event and notified affected individuals.
Disclosure in Violation of the Identifying Information Law	Agency inadvertently displayed clients' identifying information to an oversight body. The agency ended the display and is investigating.
Disclosure in Violation of the Identifying Information Law (5)	In five instances, agency employees improperly disclosed identifying information to third parties.

Submitted by: Michael Fitzpatrick

Date: June 30, 2023

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