

**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, 2019 through December 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
<b>Total number of disclosure(s) reported by agencies as made under exigent circumstance(s):</b> (N.Y.C. Admin. Code § 23-1202(d)(2))	0
<b>Total number of disclosure(s) reported by agencies as made in violation of the Identifying Information Law:</b> (N.Y.C. Admin. Code § 23-1202(c)(4))	19**

\*\* Note: This number includes incidents that occurred during prior reporting periods, but were reported this period.

For the reporting period September 16, 2019 through December 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	Agency mailed a client an envelope that inadvertently contained a letter with identifying information of another client. The agency requested that the client who received the mailing either return or destroy the information, and reported preparing notification to the client whose information was disclosed.
Disclosure in Violation of the Identifying Information Law	By using the “reply all” email function, agency employee inadvertently emailed an individual’s identifying information to a third party who had previously been in contact with the agency. The agency requested that the third party delete the emails, and has reported taking steps with employees to ensure appropriate email practices.
Disclosure in Violation of the Identifying Information Law	Agency system automatically reproduced, online, certain identifying information submitted via an online portal by a member of the public. The agency reported notifying the affected individual of the redisclosure. Following discussion with CPO, the agency has modified its automation practices to prevent similar occurrences.
Disclosure in Violation of the Identifying Information Law	Agency contractor inadvertently mailed a client’s document, which included identifying information, to a different client. The client who received the document later returned it to the agency.
Disclosure in Violation of the Identifying Information Law	Agency contractor inadvertently included a client’s identifying information in photocopied letters intended to be blank, which were sent to other clients. The agency contacted the other clients to request that they destroy the letter. The agency reported preparing a notification letter to the client whose identifying information was disclosed.

Disclosure in Violation of the Identifying Information Law	Certain agency contractor employees improperly accessed agency program participants' identifying information in order to obtain benefits for themselves. A criminal investigation was commenced and remains ongoing. The agency understands that affected individuals have been notified during the course of the investigation. The agency noted that the contractor has taken steps to improve its internal procedures to prevent a recurrence.
Disclosure in Violation of the Identifying Information Law	Agency subcontractor improperly emailed identifying information of individual applicants for agency services, by including their respective emails in the "TO" line of the email. The agency will notify recipients of the email and discuss any questions raised by the email content.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently emailed the identifying information of an applicant for agency services to another applicant. The recipient of the email notified the agency of the error.
Disclosure in Violation of the Identifying Information Law	Certain agency employees were alleged to have disclosed, for personal gain, identifying information of individuals to third parties who were not entitled to access the information. This matter is under criminal investigation. The agency is working with investigators to identify affected individuals for notification purposes.
Disclosure in Violation of the Identifying Information Law	Agency employees inadvertently mailed an employee's personnel records, including identifying information, to another agency, which returned the records. The disclosing agency notified the individual whose identifying information was disclosed.
Disclosure in Violation of the Identifying Information Law	Agency employee visiting a residential building lost a document containing identifying information of other residents to be contacted by the agency. A resident found the document and provided it a building security guard, who returned it to the agency.
Disclosure in Violation of the Identifying Information Law	Eight (8) instances in which agency employees inadvertently mailed documents with identifying information to an incorrect recipient. The documents were returned to the agency in each instance. The agency notified the individuals whose identifying information was disclosed. The CPO and Agency Privacy Officer will further discuss the circumstances around these disclosures.

**Submitted by:** \_\_\_\_\_

Laura Negrón  
Chief Privacy Officer, City of New York

**Date:** December 26, 2019