

## 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: September 16, 2022, through December 15, 2022**

\*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)(2))	2
<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))	21

For the reporting period September 16, 2022, through December 15, 2022, 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
Collection Under Exigent Circumstances (2)	In two instances, an agency collected identifying information from another agency for an urgent public health need.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently emailed more client identifying information than intended to a vendor. The vendor agreed to delete the information and the agency is confirming the deletion.
Disclosure in Violation of the Identifying Information Law (3)	In three instances, agency employees inadvertently sent client identifying information to other clients. The agency notified the individuals whose identifying information was inadvertently disclosed.
Disclosure in Violation of the Identifying Information Law (2)	In two instances, physical property containing client identifying information was stolen. The agencies notified affected clients where appropriate.
Disclosure in Violation of the Identifying Information Law	Agency employee improperly stored client identifying information in a non-agency-approved system. The information was deleted from the non-approved system and entered into the agency's approved system. The employee was retrained in privacy and data handling procedures.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently provided access to a database containing identifying information to employees of other agencies. The intended access settings have been restored.
Disclosure in Violation of the Identifying Information Law	Agency employee inadvertently emailed a complainant's identifying information to a respondent in a dispute resolution proceeding. The agency instructed the respondent to delete the identifying information and notified the affected complainant.
Disclosure in Violation of the Identifying Information Law	Agency was notified internal identifying information of employees was posted on a publicly accessible website. The agency notified the website, which removed the identifying information. The agency will notify the affected employees.

Disclosure in Violation of the Identifying Information Law	Agency employee was inadvertently emailed another employee's identifying information. The email was retracted and deleted.
Disclosure in Violation of the Identifying Information Law	Agency employee did not encrypt an email to a vendor containing a client's identifying information. The agency notified the affected client.
Disclosure in Violation of the Identifying Information Law	Agency employees received a phishing email which resulted in access to an email account. The agency remediated and reset the affected email accounts.
Disclosure in Violation of the Identifying Information Law	Agency employee disclosed identifying information to a third party.
Disclosure in Violation of the Identifying Information Law	Identifying information possessed by an agency was improperly disclosed to a third party after being shared among agency employees.
Disclosure in Violation of the Identifying Information Law	Agency employee improperly accessed agency database and disclosed identifying information to a third party.
Disclosure in Violation of the Identifying Information Law	Agency employee received a phishing email which may have allowed access to the employee's email account. The agency disabled the account and is investigating.
Disclosure in Violation of the Identifying Information Law	Agency employee's identifying information was inadvertently included on a contact list the agency sent to a third party. The employee notified the agency, and the agency removed the identifying information from the list.
Disclosure in Violation of the Identifying Information Law (2)	In two instances, a third party made unauthorized changes to identifying information in an agency client's online account containing information about multiple individuals. The agency remediated and is notifying affected individuals.
Disclosure in Violation of the Identifying Information Law	Agency vendor experienced a cyber event where the identifying information of current and former agency employees was accessed. The agency notified the current employees and will notify former employees. The vendor is providing identity theft protection to affected employees.

Submitted by: *Michael Fitzpatrick*  
[Michael Fitzpatrick \(Dec 27, 2022 16:44 EST\)](#)

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