



## Personally Identifiable Information (PII) Policy

**Effective:** December 1, 2016

**Revised:** November 17, 2021; July 1, 2022

**Reference:** USDOL TEGL 39-11; Privacy Act of 1974; Computer Security Act of 1987; NYS OTDA 14-LCM-15; OMB Memoranda M-07-16, M-06-15, and M-06-19

### **Policy:**

The Oswego County WDB will require all staff to take all reasonable measures to ensure the privacy and confidentiality of all PII including social security numbers (SSNs). When handling PII, the following principles will be observed:

1. Oswego County Workforce New York (OCWNY) will collect, use, record, and/or retain PII only as necessary to comply with requirements of the law or to carry out necessary business functions;
2. OCWNY will protect the confidentiality of PII and limit access to such information only for legitimate business purposes. OCWNY will use PII only for the purposes for which the information was originally obtained. OCWNY will obtain the consent of the person concerned before externally disclosing PII, except to the extent necessary to (i) respond to judicial orders or subpoenas; (ii) investigate, prevent or act regarding suspected illegal activities, fraud, claims against OCWNY or to ensure the safety of agency persons or property; or (iii) as otherwise authorized or required by law or contract. OCWNY will not communicate any PII to the public;
3. Where a unique identification number is required for a purpose not based in law, OCWNY will attempt to use a number other than an SSN, in most cases the OSOS ID number or, if there is no current reasonably feasible alternative, will make special efforts to ensure that SSNs are maintained in files which are protected from unauthorized disclosure. This includes, but is not limited to customer case files, email communications, and other correspondence;
4. OCWNY staff will remove files or technology containing PII from the One-Stop center only as necessary in conducting business and will remain conscious of and avoid any potential security breaches; and
5. OCWNY will use appropriate methods for destroying sensitive PII in paper files (i.e. shredding or burning).

### **Incident Reporting:**

OCWNY staff or contractors will report any breach or suspected breach of PII to their immediate supervisor and the Senior Computer Services Assistant within one business day of the incident. Staff or contractors should be prepared to provide details as to the nature, location, date, time, individuals, and PII involved in the incident. Additional information may be requested as needed. The supervisor and Senior Computer Services Assistant will investigate and keep the Coordinator of Client Services and the Director of Employment & Training apprised of the situation.