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PURPOSE AND SCOPE

The City of Milford recognizes its need to maintain the confidentiality of Personally Identifiable Information (PII) and understands that such information is unique to each individual. The PII covered by this policy may come from various types of individuals performing tasks on behalf of the City and includes that of employees, elected and appointed officials, members of City committees and boards, applicants, independent contractors, taxpayers and utility users. The scope of this policy is intended to be comprehensive and will include City requirements for the security and protection of such information throughout the City and its approved vendors both on and off city premises.

DEFINITIONS

Personally Identifiable Information (PII): Any information pertaining to an individual that can be used to distinguish or trace a person's identity. PII may reside in hard copy or electronic records; both forms of PII fall within the scope of this policy.

Public PII: Information that is considered PII that is available in public sources such as telephone books, public websites, etc. Public PII includes:

1. First and last name
2. Address
3. Work telephone number
4. Work e-mail address
5. Home telephone number
6. General educational credentials
7. Photos and video

Private PII: Any one or more information including, but not limited to:

1. U.S. Social Security number (or foreign equivalent)
2. Username and password
3. Passport number
4. State or foreign driver's license number
5. State issued ID
6. Credit or debit card number (including PIN or access numbers)
7. Clearances
8. Banking information
9. Biometrics
10. Date and place of birth
11. Mother's maiden name
12. Criminal, medical and financial records
13. Educational transcripts
14. Personnel records

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- 15. U.S. Taxpayer Identification Numbers (or foreign equivalent)
- 16. U.S. Employer Identification Numbers (or foreign equivalent)
- 17. Photos and video containing images of any Private PII

Vendors: Individual(s) or companies that have been approved by the City as a recipient of organizational PII and from which the City has received certification of their data protection practices conformance with the requirements of this policy. Vendors include all external providers of services to the City and include proposed vendors. No PII information can be transmitted to any vendor in any method unless the vendor has been pre-certified for the receipt of such information.

APPLICABILITY

This policy applies to all City of Milford elected and appointed officials, committee and board members, employees and other system users including, but not limited to, full-time, part-time, casual, seasonal, temporary and other special employees, and any vendors/independent contractors with access to City systems.

GENERAL GUIDELINES

Procedures

This section provides guidelines on how to maintain Personally Identifiable Information. All electronic files that contain Private PII shall reside within a secure, limited-access location of the City’s information system. All physical files that contain Private PII shall be protected with at least two forms of physical security measures, such as building security, building access controls, individual office access controls, and locks or other security for individual filing cabinets, safes, etc, when not being actively viewed or modified. All users are expressly prohibited from downloading Private PII to any personal or organization-owned workstations or mobile devices (such as laptops, personal digital assistants, mobile phones, tablets or removable media). . All applicable users are expressly prohibited from distributing any Private PII through any form of insecure electronic communication, including e-mail or instant messaging systems. Significant security risks emerge when PII is transferred from a secure location to a less secure location or is disposed of improperly.

Paper, materials, data and all other records containing PII awaiting disposal must be secured with the same standards as all other PII until the moment of destruction. For instance, purged paper records awaiting destruction must be locked in a secured container or maintained in the original, secure location until destruction.

PII Retention

The City of Milford maintains organizational records in accordance with the Delaware Public Archives State Agency General Records Retention Schedule.

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PII Training

All department directors, supervisors and City employees are provided with training to introduce and reinforce this policy and procedures for the maintenance of PII data and shall receive biannual training regarding the security and protection of PII data and City proprietary data. All City employees are provided with a copy of this Policy and are required to acknowledge that they have received and read the document.

PII Audits

The City of Milford conducts audits of PII information maintained by the organization in conjunction with fiscal year closing activities to ensure that this policy remains strictly enforced and to ascertain the necessity for the continued retention of PII information.

Data Access

The City of Milford maintains multiple IT systems where PII data may reside; thus, user access to such IT systems is the responsibility of the IT department. The IT department has created internal controls for such systems to establish legitimate access for users of data, and access shall be limited to those approved by City Administration. Any change in vendor status or the termination of an employee or independent contractor with access will immediately result in the termination of the user's access to all systems where the PII may reside.

Data Transmission and Transportation

1. **City Premises Access to PII:** Human Resources and IT have defined responsibilities for on-site access of data that may include access to PII; IT has oversight responsibility for all electronic records and data access capabilities. Human Resources has the operational responsibility for designating initial access and termination of access for individual users within their organizations and providing timely notice to IT.
2. **Vendors:** The City of Milford may share data with vendors who have a business need to have PII data. Where such inter-organizational sharing of data is required, the IT department is responsible for creating and maintaining data encryption and protection standards to safeguard all PII data that resides in the databases provided to vendors.
3. **Portable Storage Devices:** The City of Milford reserves the right to restrict PII data it maintains in the workplace. In the course of doing business, PII data may also be downloaded to laptops or other computing storage devices to facilitate City business. To protect such data, the City will also require that any such devices use IT department encryption and security protection software while such devices are in use on or off City premises. The IT department has responsibility for maintaining data encryption and data protection standards to safeguard PII data that resides on these portable storage devices.
4. **Off-Site Access to PII:** The City of Milford understands that employees and City committees and board members may need to access PII while off site or on business travel, and access to such data shall not be prohibited, subject to the provision that the data to be accessed is minimized to the degree possible to meet business needs and that

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such data shall reside only on assigned laptops/approved storage devices that have been secured in advance by the IT department.

Data Breaches/Notification

Databases or data sets that include PII may be breached inadvertently or through wrongful intrusion.

The City Solicitor or another legal resource having subject matter expertise shall be consulted prior to making any notification of any actual or suspected breach to the public or any affected individual or organization in accordance with prevailing regulatory requirements. Once the required content, timing and audience/recipients for such communication is determined through legal consultation, the City will notify all affected individuals whose PII data may have been compromised, and the notice will be accompanied by a description of action being taken to reconcile any damage as a result of the data breach. Notices will be provided as expeditiously as possible and in no event be later than the commencement of the payroll period after which the breach was discovered.

The IT Director must be informed of a real or suspected disclosure of Personal PII data within 24 hours after discovery. Examples of disclosure incidents include misplacing a paper report, loss of a laptop, mobile device or removable media containing PII, accidental email of PII, suspicion of a possible virus or malware infection on a computer containing PII, etc.

Regulatory Requirements

It is the policy of the City to comply with any international, federal or state statute and reporting regulations.

Confirmation of Confidentiality

All City employees and City committees and board members must maintain the confidentiality of PII as well as City proprietary data to which they may have access and understand that such PII is to be restricted to only those with a business need to know.

PUBLIC RECORDS

Public records will be managed in compliance with applicable local, state and federal laws, regulations, and policies including the Delaware Freedom of Information Act (covering Open Meeting Law, Public Records Law), and Public Records retention schedules, Copyright Law and other applicable City policies.

VIOLATIONS

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The City of Milford views the protection of PII data to be of the utmost importance. Infractions of this policy or IT procedures will result in disciplinary action up to and including termination.

If you have questions regarding appropriate use of this policy, please contact your supervisor, the Human Resources Administrator or your respective Appointing Authority.

Appointing Authority Signature

Date

I, _____, acknowledge that I have received and read a copy of this policy.

Employee/System User Signature

Date