

## 617 Identity Protection Policy

The Board of The Library Trustees of the Nippersink Public Library District, McHenry County, Illinois (the "Library"), hereby adopts this Identity Protection Policy pursuant to the Illinois Identity Protection Act 5 ILCS 179/1 *et seq.*

The Identity Protection Act requires each local and State government agency to draft, approve, and implement an Identity-Protection Policy to ensure the confidentiality and integrity of Social Security numbers ("SSNs") that are collected, maintained or used, so as to safeguard SSNs against unauthorized access because SSNs can be used to facilitate identity theft. The goal of the Identity Protection Act and of this Policy is, in part, to require the Library to assess its personal information collection practices and to make any necessary changes to those practices to ensure confidentiality.

### Social Security Number Protection:

Whenever an individual is asked to provide the LIBRARY with a SSN, the LIBRARY shall provide that individual with a statement of the purpose or purposes for which THE LIBRARY is collecting and using the SSN. THE LIBRARY shall also provide such statement of purpose upon request. The format for such Statement of Purpose is appended as an exhibit to this Policy.

THE LIBRARY shall not:

- 1) Publicly post or publicly display in any manner an individual's SSNs. "Publicly post" or "publicly display" means to intentionally communicate or otherwise intentionally make available to the general public.
- 2) Print an individual's SSN on any card required for the individual to access products or services provided by the LIBRARY.
- 3) Require an individual to transmit a SSN over the Internet, unless the connection is secure or the SSN is encrypted.
- 4) Print an individual's SSN on any materials that are mailed to the individual through the U.S. Postal Service, any private mail service, electronic mail, or any similar method of delivery, unless State or federal law requires the SSN to be on the document to be mailed. SSNs may be included in applications and forms sent by mail, including, but not limited to, any material mailed in connection with the administration of the Unemployment Insurance Act, any material mailed in connection with any tax administered by the Department of Revenue, and documents sent as part of an application or enrollment process or to establish, amend, or terminate an account, contract, or policy or to confirm the accuracy of the SSN. A SSN that permissibly mailed will not be printed, in whole or in part, on a postcard or other mailer that does not require an envelope, or be visible on an envelope without the envelope having been opened.

In addition, the LIBRARY shall not:

- a) Collect, use, or disclose a Social Security number from an individual, unless:
  - i. required to do so under State or federal law, rules, or regulations, or the collection, use, or disclosure of the SSN is otherwise necessary for the performance of the Library's duties and responsibilities;
  - ii. the need and purpose for the SSN is documented before collection of the SSN; and
  - iii. the SSN collected is relevant to THE LIBRARY's documented need and purpose.

- b) Require an individual to use his or her Social Security number to access an Internet website.
- c) Use the Social Security number for any purpose other than the purpose for which it was collected.

The prohibitions set forth above in Paragraphs a) through c) do not apply in the following circumstances:

- (1) The disclosure of SSNs to agents, employees, contractors, or subcontractors of a governmental entity or disclosure by a governmental entity to another governmental entity or its agents, employees, contractors, at' subcontractors if disclosure is necessary in order for the LIBRARY to perform its duties and responsibilities; and, if disclosing to a contractor or subcontractor, prior to such disclosure, the LIBRARY must first receive from the contractor or subcontractor a copy of the contractor's or subcontractor's policy that sets forth how the requirements imposed under Illinois Identity this Act on a governmental entity to protect an individual's Social Security number will be achieved.
- (2) The disclosure of SSNs pursuant to a court order, warrant, or subpoena.
- (3) The collection, use, or disclosure of SSNs in order to ensure the safety of State and local government employees; persons committed to correctional facilities, local jails, and other law-enforcement facilities or retention centers; wards of the State; and all persons working in or visiting a State or local government agency facility.
- (4) The collection, use, or disclosure of SSNs for internal verification or administrative purposes.
- (5) The disclosure of SSNs by a State agency to any entity for the collection of delinquent child support or of any State debt or to a governmental agency to assist with an investigation or the prevention of fraud.
- (6) The collection or use of SSNs to investigate or prevent fraud, to conduct background checks, to collect a debt, to obtain a credit report from a consumer reporting agency under the federal Fair Credit Reporting Act, to undertake any permissible purpose that is enumerated under the Federal Gramm Leach Bliley Act, or to locate a missing person, a lost relative, or a person who is due a benefit, such as a pension benefit or an unclaimed property benefit.

#### Requirement to Redact Social Security Numbers:

The LIBRARY shall comply with the provisions of any other State law with respect to allowing the public inspection and copying of information or documents containing all or any portion of an individual's SSN.

The LIBRARY shall redact social security numbers from the information or documents before allowing the public inspection or copying of the information or documents.

When collecting SSNs, the LIBRARY shall request each SSN in a manner that makes the SSN easily redacted if required to be released as part of a public records request. "Redact" means to alter or truncate data so that no more than five sequential digits of a Social Security number are accessible as part of personal information.

#### Employee Access to Social Security Numbers:

Only the LIBRARY employees who are required to use or handle information or documents that contain SSNs will have access, All employees who have access to SSNs shall be trained to protect the confidentiality of SSNs.

Adopted: 9/13/11