



## Identity Protection Policy

The purpose of this policy is to protect social security numbers from unauthorized disclosure. Regarding the use of social security numbers, the Three Rivers Public Library District intends to comply with the provisions of the Identity Protection Act (5 ILCS 179/1 et seq.).

- A. All employees who have access to social security numbers in the course of performing their duties must be trained to protect the confidentiality of social security numbers. Training will include instructions on the proper handling of information that contains social security numbers from the time of collection through the destruction of the information.
- B. Only employees who are required to use or handle information or documents that contain social security numbers will have access to such information or documents.
- C. Social security numbers requested from an individual will be provided in a manner that makes the social security number 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 for a social security number are accessible as part of personal information.
- D. When collecting a social security number, or upon request by the individual, a statement of the purpose or purposes for which the social security number is being collected and used must be provided. Exhibit A, attached.

No employee may do any of the following:

- A. Publicly post or publicly display in any manner an individual's social security number. "Publicly post" or "publicly display" means to intentionally communicate or otherwise intentionally make available to the general public.
- B. Print an individual's social security number on any card required for the individual to access products or services.
- C. Encode or embed an individual's social security number in or on any cards or documents, including, but not limited to, using a bar code, chip, magnetic strip, RFID technology, or other technology.
- D. Require an individual to transmit his or her social security number over the Internet, unless the connection is secure or the social security number is encrypted.
- E. Print an individual's social security number 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 social security number to be on the document to be mailed. Notwithstanding any provision in this Section to the contrary, social security numbers 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 social security number. A social security number that may

permissibly be mailed under this Section may 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.

- F. 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 social security number is otherwise necessary for the performance of that agency's duties and responsibilities;
  - ii. The need and purpose for the social security number is documented before collection of the social security number; and
  - iii. The social security number collected is relevant to the documented need and purpose.
- G. Require an individual to use his or her social security number to access an Internet website.
- H. Use the social security number for any purpose other than the purpose for which it was collected.

The prohibitions listed immediately above do not apply in the following circumstances:

- A. The disclosure of social security numbers pursuant to a court order, warrant, or subpoena.
- B. The collection, use, or disclosure of social security numbers in order to ensure the safety of other employees.
- C. The disclosure of social security numbers 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.
- D. The collection, use, or disclosure of social security numbers for internal verification or administrative purposes.
- E. The collection or use of social security numbers 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.

Notwithstanding any other provision of this policy to the contrary, all employees must 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 social security number. This includes requests for information or documents under the Illinois Freedom of Information Act.

Employees must redact social security numbers before allowing the public inspection or copying of the information or documents.

A copy of this policy shall be made available to the public upon request.

This policy does not apply to the collection, use, or disclosure of a social security number as required by state or federal law, rule, or regulation.

Exhibit A  
Identity Protection Policy

**STATEMENT OF PURPOSE FOR COLLECTION OF SOCIAL SECURITY NUMBERS**

The Identity Protection Act, 5 ILCS 179/1 *et seq.*, requires each unit of local government to approve and implement an Identity Protection Policy that includes a statement of the purpose or purposes for which the agency is collecting and using an individual's Social Security Number (SSN).

This statement of purpose is being provided to you because you have been asked by the Library to provide your SSN or because you requested a copy of this statement.

**Why does the Library collect your Social Security Number?**

You are being asked for your SSN for one or more of the following reasons:

- Complaint mediation or investigation;
- Crime victim compensation;
- Vendor services, such as executing contract and/or billing;
- Law enforcement investigation;
- Child support collection;
- Internal verification;
- Administrative services; and/or
- Other \_\_\_\_\_

**What does the Library do with your Social Security Number?**

- We will only use your SSN for purpose(s) for which it was collected;
- We will not:
  - Sell, lease, loan, trade, or rent your SSN to a third party for any purpose;
  - Publicly post or publicly display your SSN;
  - Print your SSN on any card required for you to access our services;
  - Require you to transmit your SSN over the Internet, unless the connection is secure or your SSN is encrypted; or
  - Print your SSN on any materials that are mailed to you, unless State or Federal law requires that number to be on documents mailed to you, or unless we are confirming the accuracy to your SSN.

**Questions or Complaints about this Statement of Purpose**

Write to the Library, Attn: Executive Director