

IDENTITY PROTECTION POLICY

The Lincolnwood Public Library District (the "Library") adopts this Identity Protection Policy pursuant to the Identity Protection Act, 5 ILCS 179/1et seq. The Identity Protection Act requires units of local government in Illinois to approve and implement an Identity Protection Policy to insure the confidentiality and integrity of Social Security Numbers ("SSNs") that agencies collect, maintain, and use. It is important to safeguard SSNs against unauthorized access because they can be used to facilitate identity theft. One way to better protect SSNs is to limit their widespread dissemination. The Identity Protection Act was passed in part to require government agencies to reassess their personal information collection practices in order to make changes to better insure the confidentiality of SSNs.

Protection of Social Security Numbers

Whenever an individual is asked to provide the Library with a Social Security Number ("SSN"), the Library shall provide that individual with a written statement indicating the purpose(s) for which the Library is collecting and using the SSN. The Library shall also provide such statement upon request. A sample "Statement of Purpose(s)/Disclosure Form" is appended to this policy.

The Library shall not:

1. Publicly post or display in any manner an individual's SSN. "Publicly post or display" means to intentionally communicate or otherwise intentionally make something 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 person or 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 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 is permissibly mailed will not be printed, in whole or in part, on a postcard or other mailer that does not require an envelope. Nor will an SSN be visible on (or through) an envelope without the envelope having been opened.

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In addition, the Library shall not:¹

1. Collect, use, or disclose an individual's SSN 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 of the SSN is documented before it is collected; and
 - (iii) The SSN collected is relevant to the documented need and/or purpose.
2. Require any individual to use his or her SSN to access an internet website;
3. Use the SSN for any purpose other than that for which it was collected.

Requirement to Redact Social Security Numbers

The library shall comply with 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 SSNs from the information or documents before allowing public inspection or copying of the information or documents.

When collecting SSNs the library shall request and/or transcribe each SSN in a manner that makes the SSN easily redacted from any document or portion of a document that is 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 SSN are accessible as part of personal information.

Employee Access to Social Security Numbers

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

¹ These prohibitions do not apply in the following circumstances:

- (1) The disclosure of an SSN 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, or subcontractors if disclosure is necessary in order for the entity to perform its duties and responsibilities; and, if before disclosing a SSN to a contractor or subcontractor, the governmental entity must first receive from the contractor or subcontractor a copy of its policy that sets forth how the requirements imposed under the Identity Protection Act to protect an individual's SSN 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 enforcement facilities or retention centers; wards of the State; and all persons working in or visiting the facility of a State or local government agency.
- (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 any State debt, or disclosure of SSNs 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 unclaimed property benefit.

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**Statement of Purpose(s)/Disclosure Form:
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/disclosure form 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 of purpose.

Why does the Library collect your SSN?

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 contracts and/or billing.
- Law enforcement investigation.
- Child support collection.
- Internal verification.
- Administrative purposes(e.g., payroll reporting requirements)
- Criminal background check
- Other _____

What does the Library do with your SSN?

- We will only use your SSN for the 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 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 SSN to be on documents mailed to you, or unless we are confirming the accuracy of your SSN.

Questions or Complaints about this Statement of Purpose/ Disclosure Form

Write to the Library, Attn: Library Director.