

## **SOCIAL SECURITY NUMBER PRIVACY POLICY**

Motion by Mayor Pro-Tem Owen to adopt the following Social Security Number Privacy Policy:

### **CITY OF OWOSSO SOCIAL SECURITY NUMBER PRIVACY POLICY**

#### **1. Purpose.**

The City of Owosso is required by the Michigan Social Security Number Privacy Act, Public Act 454 of 2004, MCL 445.81, *et seq.*, to create a privacy policy concerning the Social Security numbers that it possesses or obtains.

#### **2. Policy.**

It is the policy of the City to protect the confidentiality of the Social Security numbers obtained in the ordinary course of business from employees, vendors, contractors, customers or others. No person shall knowingly obtain, store, transfer, use, disclose, or dispose of a Social Security number that the City obtains or possesses except in accordance with the Act and this Privacy Policy.

#### **3. Procedure.**

- a. Obtaining Social Security Numbers.** Social Security numbers should be collected only where required by federal and state law, or as otherwise permitted by federal and state law for legitimate reasons consistent with this Privacy Policy.

Legitimate reasons for collecting a Social Security number include, but are not limited to:

- Applicants may be required to provide a Social Security number for purposes of a pre-employment background check.
  - Copies of Social Security cards may be obtained for purposes of verifying employee eligibility for employment.
  - Social Security numbers may be obtained from employees for tax reporting purposes, for new hire reporting or for purposes of enrollment in any City employee benefit plans.
  - Social Security numbers may be obtained from creditors or vendors for tax reporting purposes.
- b. Public Display.** All or more than four sequential digits of a Social Security number shall not be placed on identification cards, badges, time cards, employee rosters, bulletin boards, permits, licenses or any other materials or documents designed for public display. Documents, materials or computer screens that display all or more than four sequential digits of a Social Security number shall be kept out of public view at all times.
- c. Account Numbers.** All or more than four sequential digits of a Social Security number shall not be used as a primary account number for an individual.
- d. Computer Transmission.** All or more than four sequential digits of a Social Security number shall not be used or transmitted on the Internet or on a computer system or network unless the connection is secure or the transmission is encrypted.

- e. **Mailed Documents.** City documents containing all or more than four sequential digits of a Social Security number shall only be sent in cases where state or federal law, rule, regulation, or court order or rule authorizes, permits or requires that a Social Security number appear in the document. Documents containing all or more than four sequential digits of a Social Security number, that are sent through the mail, shall not reveal the number through the envelope window or otherwise be visible from outside the envelope or package.
- f. **Freedom of Information Act.** Where all or more than four sequential digits of a Social Security number are contained within a document subject to release under the Freedom of Information Act, the Social Security number shall be redacted or otherwise rendered unreadable before the document or copy of a document is disclosed.
- g. **Storage.** All documents containing Social Security numbers shall be stored in a physically secure manner. Social Security numbers shall not be stored on computers or other electronic devices that are not secure against unauthorized access.
- h. **Access to Social Security Numbers.** Only personnel who have legitimate business reasons to know will have access to records containing Social Security numbers. The department head having access to records containing Social Security numbers shall determine which other personnel within their department have legitimate reason in the City's ordinary course of business to have access to such Social Security numbers. Personnel using records containing Social Security numbers must take appropriate steps to secure such records when not in immediate use.
- i. **Disposal.** Documents containing Social Security number will be retained in accordance with the requirements of state and federal laws and the City's retention policy. At such time as documents containing Social Security numbers may be disposed of, such disposal shall be accomplished in a manner that protects the confidentiality of the Social Security numbers, such as shredding.
- j. **Unauthorized Use or Disclosure of Social Security Numbers.** The City shall take reasonable measures to enforce this Privacy Policy and to correct and prevent reoccurrence of any known violations. Any employee who knowingly obtains, uses or discloses Social Security numbers for unlawful purposes or contrary to the requirements of this Privacy Policy shall be subject to discipline up to and include discharge. Additionally, certain violations of the Act carry criminal and/or civil sanctions. The City will cooperate with appropriate law enforcement or administrative agencies in the apprehension and prosecution of any person who knowingly obtains, uses or discloses Social Security numbers through the City for unlawful purposes.
- k. **Guidance.** If any questions regarding Social Security number privacy and security should arise, contact the office of the City Manager for policy clarification and guidance.

Motion supported by Councilperson Horvath.

Roll Call Vote.

AYES: Councilpersons Cline, Harvey, Mayor Pro-Tem Owen, Councilpersons Bruff, Horvath, Ford, and Mayor Robertson.

NAYS: None.

I hereby certify that the foregoing is a true and complete copy of a policy adopted by the Owosso City Council at their regular meeting on December 5, 2005.

Gail L. Schultz, Owosso City Clerk