

CITY OF NILES
EMPLOYEE / APPLICANT PRIVACY

POLICY: The City of Niles takes employee and applicant privacy very seriously and strives to keep employee and applicant information secure, to restrict access to such information, and to dispose of such information securely and as prescribed by law. It is the policy and intent of the City of Niles to fully comply with the Michigan Social Security Number Privacy Act (Act 454 of 2004), as well other state or federal laws which seek to reduce the growing threat of identity theft.

IMPLEMENTATION:

The safeguards described below shall apply to both physical and electronic records

- (1) We will ensure to the extent practicable the confidentiality of social security numbers and other personal information, such as telephone numbers, addresses, driver's license numbers, etc., that we collect in the course of employment or prospective employment.
- (2) Social Security numbers will be used only when legally permissible and when absolutely necessary.
 - a. We will not publicly display all or more than 4 sequential digits of an employee or applicant's social security number
 - b. We will not use your social security number as an individual account number
 - c. We will not print your social security number on any identification badge, card, membership card, permit, or license
 - d. We will not print your social security number on the outside of an envelope or package mailed to you.
 - e. We will not require the use or transmission of more than 4 sequential digits of your social security number over the internet or a computer system or network, unless the connection is secure and the transmission is encrypted, or protected by a password or other unique person ID number or authentication device
 - f. We will include all digits of your social security numbers on any mailing or transmission only if certain conditions apply such as:
 - i. A state or federal law or rule or court order authorizes, permits, or requires the social security number's use,
 - ii. The document is sent as part of an application or enrollment initiated by you, or
 - iii. The document is sent to establish, confirm service, amend or terminate an account, contract, policy, or employee or health insurance benefit
- (3) We prohibit the unlawful disclosure of employee and applicant social security numbers or other personal information. Social Security numbers and other personal information will be disclosed only as legally permissible.
- (4) Only authorized individuals can have access to personnel files and other files, including electronic, that contain the social security number or other personal information of employees and applicants. These individuals cannot release, post, or reveal employee or applicant social security numbers or other personal information, except where permissible by law and company policy.
- (5) Prior to discarding records containing Social Security numbers or other personal information, paper records shall be securely shredded or burned and electronic records shall be "smashed or wiped".
- (6) Intentionally violating this policy will result in disciplinary action up to and including termination, as well as civil and criminal penalties.