



## **HARRISBURG TOWNSHIP PARK DISTRICT IDENTITY-PROTECTION POLICY**

### **I. INTRODUCTION AND IDENTIFICATION OF ACT**

This Identity-Protection Policy is adopted pursuant to the Illinois Identity Protection Act, 5 ILCS 179/1 *et seq.*, to protect SSNs from unauthorized disclosure. The Identity Protection Act requires HARRISBURG TOWNSHIP PARK DISTRICT to draft, approve, and implement this Identity-Protection Policy to ensure the confidentiality of Social Security numbers (SSNs) that the District collects, maintains, and uses. It is important to protect SSNs because this private information can be used to facilitate identity theft and fraud. One way to better protect SSNs is to limit access to and distribution of this private information.

All District officers, employees, and agents shall comply with the Identity Protection Act and this Policy at all times.

### **II. DEFINITIONS**

The following words shall have the following meanings when used in this Policy.

“Act” means the Illinois Identity Protection Act, 5 ILCS 179/1 *et seq.*

“Board” means the Board of Commissioners of the District.

“District” means HARRISBURG TOWNSHIP PARK DISTRICT.

“Person” means any individual in the employ of the District.

“Policy” means this Identity-Protection Policy.

“Publicly post” or “publicly display” means to intentionally communicate or otherwise intentionally make available to the general public.

“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.

“SSN(s)” means any Social Security number provided to an individual by the Social Security Administration.

“Statement of Purpose” means the statement of the purpose or purposes for which the District is collecting and using an individual’s SSN that the Act requires the District to provide when collecting a SSN or upon request by an individual. An example of a Statement of Purpose for the District is attached to this Policy.

### III. STATEMENT OF PURPOSE

The District shall provide an individual with a Statement of Purpose anytime an individual is asked to provide the District with his or her SSN or if an individual requests it.

### IV. PROHIBITED ACTIVITIES

(a) Neither the District nor any Person may:

1. Publicly post or publicly display in any manner an individual's SSN.
2. Print an individual's SSN on any card required for the individual to access products or services provided by the person or entity.
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. Notwithstanding the foregoing, SSNs may be included in applications and forms sent by mail, including, but not limited to: (i) any material mailed in connection with the administration of the Unemployment Insurance Act; (ii) any material mailed in connection with any tax administered by the Department of Revenue; and (iii) 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 pursuant to this paragraph 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.

(b) Except as otherwise provided in paragraph (c) below or unless otherwise provided in the Act, neither the District nor any Person may:

1. Collect, use, or disclose a SSN 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 District'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 documented need and purpose.
2. Require an individual to use his or her SSN to access an Internet website.
3. Use the SSN for any purpose other than the purpose for which it was collected.

(c) The prohibitions in paragraph (b) above 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, or subcontractors if disclosure is necessary in order for the entity to perform its duties and responsibilities; and, if disclosing to a contractor or subcontractor, prior to such disclosure, the governmental entity first receives from the contractor or subcontractor a copy of the contractor's or

subcontractor's policy that sets forth how the requirements imposed under this Act on a governmental entity 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 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 the District for the collection of delinquent child support or of any State debt or to the District 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.

#### **V. COORDINATION WITH THE FREEDOM OF INFORMATION ACT AND OTHER LAWS**

The District shall comply with the provisions of the Illinois Freedom of Information Act, 5 ILCS 140/1 *et seq.*, and 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. However, the District shall redact SSNs from the information or documents before allowing the public inspection or copying of the information or documents.

When collecting SSNs, the District shall request each SSN in a manner that makes the SSN easy to redact if required to be released as part of a public records request.

#### **VI. LIMITED EMPLOYEE ACCESS TO SOCIAL SECURITY NUMBERS**

Only 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 first be trained to protect the confidentiality of SSNs. The training will include instructions on the proper handling of information that contains SSNs from the time of collection through destruction of the information.

#### **VII. EMBEDDED SOCIAL SECURITY NUMBERS**

Neither the District nor any Person shall encode or embed a SSN in or on a card or document, including but not limited to, using a bar code, chip, magnetic strip, RFID technology, or other technology, in place of removing the SSN as required by the Act and this Policy.



**VIII. APPLICABILITY**

If any provision of this Policy conflicts with any provision of the Act, the provisions of the Act shall prevail.

This Policy does not apply to:

1. the collection, use, or disclosure of a SSN as required by State or federal law, rule, or regulation; or
2. documents that are recorded with a county recorder or required to be open to the public under a State or federal law, rule, or regulation, applicable case law, Supreme Court Rule, or the Constitution of the State of Illinois; provided, however, that the District shall redact the SSN from such document if such law, rule, or regulation permits.

**IX. AVAILABILITY OF POLICY**

The Policy shall be filed with the Board within 30 days of its approval. All District employees shall be advised of the existence of this Policy.

District employees who are required to use or handle information or documents that contain SSNs have been provided a copy of this Policy, which each shall maintain at all times. A copy of the Policy is available to all other employees and any member of the public by requesting a copy from: Harrisburg Township Park District – 921 W. Poplar Street, Harrisburg, IL 62946 – (618) 252-2111.

**X. AMENDMENTS**

This Policy may be amended by the District at any time. If the Policy is amended, the District shall file a written copy of the Policy, as amended, with the Board and shall also advise all District employees of the existence of the amended Policy. A copy of the amended Policy will be made available to District employees and the public as set forth in the preceding section above.

**XI. EFFECTIVE DATE**

This Policy becomes effective AUGUST 16, 2019.

Richard R Rumsey  
Richard Rumsey, President

Doug Emery  
Doug Emery, Vice President

ATTEST:

8/16/19  
Date Signed

Michael Williams  
Michael Williams, Secretary / Treasurer



## ATTACHMENT

### STATEMENT OF PURPOSE FOR COLLECTION OF SOCIAL SECURITY NUMBERS BY THE HARRISBURG TOWNSHIP PARK DISTRICT

The Identity Protection Act, 5 ILCS 179/1 *et seq.*, and the Identity-Protection Policy of the HARRISBURG TOWNSHIP PARK DISTRICT (“District”) require the District to provide an individual with a statement of the purpose or purposes for which the District is collecting and using the individual’s Social Security number (“SSN”) anytime an individual is asked to provide the District with his or her SSN or if an individual requests it. This Statement of Purpose is being provided to you because you have been asked by the District to provide your SSN or because you requested a copy of this statement.

#### **Why are we collecting your Social Security number?**

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

- Administrative services: employment eligibility verification, payroll and tax purposes, retirement and pension plan purposes, employment benefit plan purposes, and background checks

#### **What will we do with your Social Security number?**

We will only use your SSN for the purpose 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. If mailed, your SSN will not be visible without opening the envelope in which it is contained.

**If you have questions or complaints about this Statement of Purpose submit them to:**

HARRISBURG TOWNSHIP PARK DISTRICT  
921 W. Poplar Street  
Harrisburg, IL 62946  
(618) 252-2111