

SOCIAL SECURITY NUMBER PRIVACY

1. Purpose

The County of Cass is required by the Michigan Social Security Number Privacy Act, Public Act 454 of 2004, MCL 445.81 et seq., (the "act") to create a privacy policy concerning the Social Security numbers that it possesses or obtains.

Pursuant to the Act, the privacy policy must at least:

- a. Ensure to the extent practicable the confidentiality of the Social Security numbers.
- b. Prohibit unlawful disclosure of the Social Security numbers.
- c. Limit who has access to information or documents that contain the Social Security numbers.
- d. Describe how to properly dispose of documents that contain the Social Security numbers.
- e. Establish penalties for violation of the privacy policy.

This Privacy Policy sets forth the County's policies and procedures regarding how Social Security numbers are obtained, stored, transferred, used, disclosed, and disposed of.

2. Policy

It is the policy of the County to protect the confidentiality of Social Security numbers obtained in the ordinary course of County 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 County 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 County 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, timecards, 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.** County 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 secured 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 heads having access to records containing Social Security numbers shall determine which other personnel within their departments have a legitimate reason in the County'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 numbers will be retained in accordance with the requirements of state and federal laws. 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 County shall take reasonable measures to enforce his Privacy Policy and to correct and prevent the 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 the Privacy Policy shall be subject to discipline up to and including discharge. Additionally, certain violations of the Act carry criminal and/or civil sanctions. The County 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 County for unlawful purposes.

ADOPTED: 12/15/05