

# ***Policy Statement***

**SUBJECT: City of Detroit Privacy Policy**

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## **I. Overview**

### **A. Purpose:**

The purpose of this Data Privacy Policy is to establish consistent guidelines for collecting, processing, storing, transferring, disclosing, deleting and using personal, privileged and confidential data and information within the municipal government of the City of Detroit. The City of Detroit respects the privacy of its employees, its constituents and business partners (known as “data subjects”) and takes its responsibilities regarding the security of information held on data subjects very seriously.

### **B. Audience/Scope**

This policy applies to all City of Detroit entities, employees, contractors and third party vendors that collect, process, record, store, transfer, disclose, delete and/or use City of Detroit Employee and Constituents and Business Partner Data.

Personal data and information includes any data by which a person can be identified or located, as well as any data to which City of Detroit has access in the constituents or employee systems.

Employment/Employee Data includes any data and information about an identified or identifiable person that is obtained in the context of a person's working relationship with a City of Detroit entity or third party vendor.

Personal information may be collected from covered individuals through a variety of means, including, websites, ordering processes, service or employment processes. City of Detroit may also obtain personal information about covered individuals from other publicly or commercially available sources City of Detroit deem necessary and credible.

All Privacy issues and resolutions are to be addressed through The City of Detroit Data Security and Privacy Steering Committee. Note: This committee acts as the City Privacy Office.

### **C. Legal Requirements**

This policy provides a global standard for every City of Detroit entity with respect to its protection of personal data and information. International, National, State or Local laws may require stricter standards. Therefore, City of Detroit will handle this data in accordance with applicable laws and regulations at the place where the data and information is processed. Where applicable laws provide a lower level of protection of personal data and information than established by this Policy, then the requirements of this Policy apply. Questions about compliance with applicable laws must be addressed to City of Detroit legal counsel. A table of applicable laws can be found in the City of Detroit Data Security Policy.

## **II. Policy**

1. Personal Information will be collected, stored, transferred, processed, analyzed and used in accordance to City of Detroit established guidelines and in compliance with International National, State and Local laws/regulations in the territory where those activities occur.
2. Personal Information will be collected for specified, legitimate purposes and not processed in ways incompatible with those purposes.
3. Personal Information will be relevant to and not excessive for the purposes for which they are collected and used.

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4. Personal Information will be current and accurate with reasonable steps taken to rectify or delete inaccurate personal information.
5. Personal Information will be kept only as long as necessary for the purposes for which it was collected and processed.
6. Appropriate measures will be taken to prevent unauthorized access, unlawful processing, and unauthorized or accidental loss, destruction, or damage to data. City of Detroit is committed to taking appropriate technical and administrative measures to protect personal information against unauthorized access or disclosure. These measures include:
  - Classifying personal information into its rightful category. Please refer to the Information Classification Policy
  - Personal information files and databases are maintained on systems that are protected by secure network architectures that contain firewalls and intrusion detection devices. The servers holding this data are "backed up" per the City of Detroit Backup & Restore Policy.
  - Servers housing personal information are physically and environmentally secure
  - Access: City of Detroit limits access to internal systems that hold personal data to a select group of authorized users who are given access to such systems through the use of a unique identifier and password. Access to this data is limited to individuals for the purpose of performing their job duties.
  - Training: City of Detroit will conduct training to authorized users regarding the lawful and intended purposes of processing personal information. The need to protect and keep information accurate and up-to-date, and the need to maintain the confidentiality of the data to which employees have access.

### III. Exceptions:

There are circumstances; an exception to this privacy policy may apply without immediate notice. Examples are to comply with any valid legal process such as a search warrant, subpoena, statute or court order, or in other special cases, such as, for example, suspected fraudulent or criminal activity, or an attempt to breach the security of City of Detroit or its website. However, it is required that as soon as possible notification is to be forwarded to the Data Privacy Office so all interested parties can work together.

Exceptions outside of the above examples should be submitted via a written request to the Data Security Coordinator and Human Resources for approval.