

## RESOLUTION NO. 544

A RESOLUTION ADOPTING A SENSITIVE AND NON PUBLIC INFORMATION POLICY PURSUANT TO THE OREGON IDENTITY THEFT PROTECTION ACT OF 2007.

**WHEREAS**, the Oregon Legislature has enacted a new Oregon Identity Theft Protection Act giving consumers the ability to place a security freeze on their credit file; and

**WHEREAS**, the Identity Theft Protection Act contains standards to shield Social Security numbers, to notify consumers in case of a security breach, and to safeguard personal identifying information;


**NOW, THEREFORE, BE IT RESOLVED:**

The Aurora City Council hereby adopts the Sensitive and Non Public Information Policy attached hereto and incorporated by reference herein.

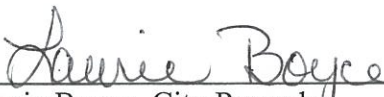
**BE IT FURTHER RESOLVED:**

The attached policy shall take effect immediately.

ADOPTED by the Aurora City Council at a regularly scheduled meeting on this 12<sup>th</sup> day of February, 2008.

  
\_\_\_\_\_  
Charles C. Donald, Mayor

**ATTEST:**

  
\_\_\_\_\_  
Laurie Boyce, City Recorder

# **1. SENSITIVE and NON PUBLIC INFORMATION POLICY**

## **1. PURPOSE**

The City of Aurora adopts this policy to help protect customers and the public's sensitive information and the city from damages related to loss or misuse of sensitive information. This policy is also intended to protect the city's elected officials, city's officers, customers, and contractors, employees, city's officers, elected officials, customers, contractors from damages related to loss or misuse of sensitive information. This policy will:

- Define sensitive information
- Describe the physical security of data when it is printed on paper
- Describe the electronic security of data when stored and distributed

## **2. SCOPE**

This policy applies to all city elected officials, officers, employees, contractors, consultants, temporaries, and other workers at the City of Aurora, including all personal affiliated with third parties.

## **3. POLICY**

### **3.1 Definition of Sensitive Information**

Sensitive information includes the following items whether stored in electronic or printed format:

#### **3.1.1 Personal Information – Sensitive information consists of personal information including, but not limited to:**

##### **3.1.1.1 Credit Card Information, including any of the following:**

- Credit Card Number (in part or whole)
- Credit Card Expiration Date
- Cardholder Name
- Cardholder Address

##### **3.1.1.2 Tax Identification Numbers, including:**

- Social Security Number
- Social Insurance Name
- Business Identification Number
- Employer Identification Numbers

**3.1.1.3 Payroll Information, including, among other information:**

- Paychecks
- Pay stubs
- Pay rates

**3.1.1.4 Cafeteria Plan Check Requests and Associated Paperwork**

**3.1.1.5 Medical Information for any Employees or Customers, including but not limited to:**

- Doctor's names and Claims
- Insurance Claims
- Prescriptions
- Any related personal medical information

**3.1.1.6 Other Personal Information belonging to Customers, Employees, and Contractors, examples of which include:**

- Date of Birth
- Address
- Residential and Personal Phone Numbers
- Maiden Name
- Names
- Customer Numbers

**3.1.2 Corporate Information-Sensitive Corporate Information includes, but is not limited to:**

3.1.2 A Company's Employees, Customers, Vendors, Suppliers, and Confidential Proprietary Information or trade secrets.

3.1.2.2 Proprietary and / or confidential information, among other things includes: Business methods, customer utilization information, retention information, sales information, marketing and other Company strategy, computer codes, screens, forms, information about, or received from, Aurora's current, former and prospective customers, sales associates or suppliers or any other non-public information. Proprietary and / or confidential information also includes

the name and identity of any customer or vendor and the specifics of any relationship between and among them and the City of Aurora.

- 3.1.3 Any document marked “Confidential,” “Sensitive,” “Proprietary,” or any document similarly labeled.
- 3.1.4 The City of Aurora personnel are encouraged to use common sense judgment in securing the City of Aurora confidential information to the proper extent. If an employee is uncertain of the sensitivity of a particular piece of information, he or she should contact their supervisor.

### **3.2 Hard Copy Distribution**

Every Employee and Contractor performing work for the City of Aurora will comply with the following policies:

- 3.2.1 File cabinets, desk drawers, overhead cabinets, and any other storage space containing documents with sensitive information will be locked when not in use.
- 3.2.2 Storage rooms containing documents with sensitive information and record retention areas will be locked at the end of each workday.
- 3.2.3 Desks, workstations, work areas, printers and fax machines, and common shared work areas will be cleared of all documents containing sensitive information when not in use.
- 3.2.4 Whiteboards, dry-erase boards, writing tablets, etc. in common shared work areas will be erased, removed, or shredded when not in use.
- 3.2.5 When documents containing sensitive information are discarded they will be placed inside a locked shred bin or immediately shredded using a mechanical cross cut or Department of Defense (DOD) approved shredding device. Locked shred bins are labeled “Confidential paper shredding and recycling”. If you need any assistance in locating one of these bins, please contact your supervisor.

### **3.3 Electronic Distribution**

Every employee and contractor performing work for the City of Aurora will comply with the following policies:

- 3.3.1.1 Internally, sensitive information may be transmitted using approved company email. All sensitive information must be encrypted when stored in an electronic format.
- 3.3.1.2 Any sensitive information sent external must be encrypted and password protected and only to approved recipients. Additionally, a statement such as the following statement should be included in the email:

“This message may contain confidential and / or proprietary information, and is intended for the person / entity to which it was originally addressed. If you have received this email by error, please contact the City of Aurora, and then shred the original document. Any use by others is strictly prohibited.”

## **4. ROLES AND RESPONSIBILITIES**

Management will have the responsibility to enforce this policy and ensure that it is followed by employees and contractors.

The City of Aurora may require contractors to sign a Third Party Policy Compliance Agreement with the City of Aurora when the City must share sensitive information with contractors.

## **5. DEFINITIONS**

**Hard Copy:** A printout of data stored in a computer. It is considered hard because it exists physically on paper, whereas a soft copy exists only electronically.

## **6. ENFORCEMENT**

Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.