

LOUTIT DISTRICT LIBRARY
SOCIAL SECURITY NUMBER PRIVACY POLICY

1. **Purpose.** The Loutit District Library (the “library”) 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 library’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 library to protect the confidentiality of Social Security numbers obtained in the ordinary course of library 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 library obtains or possesses except in accordance with the Act and this privacy policy. As used in this policy, Social Security number refers to the use of more than four sequential numbers of an individual’s Social Security number.

3. **Procedure.**
 - (a) **Use of Social Security Numbers.** Social Security numbers shall be used only where required or permitted by federal and state statute, rule or regulation, by court order or rule, or pursuant to legal discovery or process. It is not a violation of the Act to make administrative use of Social Security numbers in the ordinary course of business to do any of the following:
 - Verify an individual's identity, identify an individual, or do another similar administrative purpose related to an existing or proposed account, transaction, product, service, or employment.
 - Investigate an individual's claim, credit, criminal, or driving history.
 - Detect, prevent, or deter identity theft or another crime.
 - Lawfully pursue or enforce a person's legal rights, including, but not limited to, an audit, collection, investigation, or transfer of a tax, employee benefit, debt, claim, receivable, or account or an interest in a receivable or account.
 - Lawfully investigate, collect, or enforce a child or spousal support obligation or tax liability.
 - Provide or administer employee or health insurance or membership benefits, claims, or retirement programs or to administer the ownership of shares of stock or other investments.
 - (b) **Identifications and Public Displays.** A Social Security number shall not be visibly printed on identification cards or badges, membership cards, permits or licenses. Documents, materials or computer screens that display a Social Security number (or numbers) shall not be publicly displayed. Publicly displayed means exhibited, held up, posted, or made

visible or set out for open view, including, but not limited to, open view on a computer device or network, website, or other electronic medium or device, to members of the public or in a public manner.

- (c) Account Numbers. A Social Security number shall not be used as a primary account number for an individual.
- (d) Computer Transmission. The library shall not require an individual to transmit his or her Social Security number over the internet or a computer system or network unless the connection is secure or the transmission is encrypted. The library shall not require an individual to transmit his or her Social Security number to gain access to an internet website or a computer system or network unless the connection is secure, the transmission is encrypted, or a password or other authentication device is also required to gain such access.
- (e) Mailed and Sent Documents. Library documents containing a Social Security number shall only be mailed in cases where a state or federal law, rule or regulation authorizes, permits or requires that a Social Security number appear in the document. No documents or information containing a Social Security number shall be mailed or otherwise sent if the number is visible on or, without manipulation, from the outside of the envelope or package.

4. **Access to Social Security Numbers**. The director, assistant director and business manager shall have access to Social Security numbers based on administrative use of Social Security numbers in the ordinary course of business or based on a use that is otherwise required or permitted by law. Personnel using records containing Social Security numbers must take appropriate steps to secure such records when not in immediate use.

5. **Disposal**. Documents containing Social Security numbers shall be retained in accordance with the requirements of state and federal laws. At such time as documents containing Social Security numbers are to be disposed of, such disposal shall be accomplished in a manner that protects the confidentiality of the Social Security numbers, such as shredding.

6. **Unauthorized Use or Disclosure of Social Security Numbers**. The library shall take reasonable measures to enforce this 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 this 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 library 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 library for unlawful purposes.

7. **Publication**. This policy shall be published in the personnel policy which may be made available electronically.

Adopted: December 13, 2005

Revised: December 4, 2018