

# OAKLAND COUNTY EMPLOYEES' RETIREMENT SYSTEM (OCERS)

## SOCIAL SECURITY NUMBER PRIVACY POLICY

Adopted: July 18, 2019

### I. PURPOSE

Pursuant to the Social Security Number Privacy Act, as amended (the "Act") (MCL 445.81 *et seq.*), OCERS will protect the confidentiality of all social security numbers obtained in the ordinary course of business. No person associated with OCERS shall knowingly acquire, disclose, transfer, or unlawfully use the social security number of any member or beneficiary unless in accordance with state and federal law and the procedures and rules established hereunder.

### II. STATUTORY REQUIREMENTS

Section 4 of the Act (MCL 445.84) requires OCERS to create a policy that does all of the following with respect to the social security numbers OCERS possesses or obtains:

- a. Ensures, to the extent practicable, the confidentiality of the social security numbers;
- b. Prohibits unlawful disclosure of the social security numbers;
- c. Limits who has access to information or documents that contain the social security numbers;
- d. Describes how to properly dispose of documents that contain the social security numbers; and
- e. Establishes penalties for violation of the policy.

### III. POLICY GUIDELINES

#### A. Defined

As used in this policy, "social security number" shall include both the entire nine-digit number and more than four (4) sequential digits of the number.

#### B. Collection

Social security numbers should only be collected where required by state or federal law or as otherwise permitted under the Act.

#### C. Access

Only individuals authorized by the Retirement Administrator shall have access to information or documents that contain social security numbers.

#### **D. Display**

Social security numbers shall not be displayed on any OCERS materials or documents that are publicly available. Documents, materials, or computer screens that display social security numbers shall be kept out of public view at all times. Documents containing social security numbers that are required to be presented to the Retirement Board at a public meeting shall be redacted in such a manner so the social security number is not visible.

#### **E. Transmittal**

1. Documents containing social security numbers may only be mailed or otherwise transmitted in the following circumstances:
  - a. State or federal law, rule, regulation, or court order authorizes, permits or requires that a social security number appear in the document;
  - b. The document is sent as part of an application, enrollment, or retirement process initiated by the individual whose social security number is contained in the document; or
  - c. The document or information is sent by or at the request of an individual whose social security number appears in the document.
2. Documentation containing social security numbers that is mailed or otherwise sent to an individual shall not reveal the social security number through the envelope window, nor shall the number be otherwise visible from outside the envelope or package.
3. Social security numbers shall not be sent over the internet or a computer network unless the connection is secure or the transmission is encrypted.

#### **F. Storage and Disposal**

1. All documents or files that contain social security numbers shall be stored in a secure manner. Social security numbers shall not be stored on computers or other electronic devices that are not secured against unauthorized access.
2. Documents or materials containing social security numbers shall be discarded or destroyed in a manner that protects their confidentiality, such as shredding.

#### **G. Accountability**

Any person who knowingly fails to comply with this Policy shall be subject to discipline as determined by the Retirement Board including, without limitation, formal censure or reprimand and/or civil or criminal penalties as provided under the Act.

### **IV. POLICY REVIEW**

The Board shall periodically review this Policy to ensure that it remains relevant and appropriate.