

# Privacy Policy

The Affordable Housing Corporation of Lake County (AHC) is committed to protecting the privacy of its Clients participating in all programs. This commitment includes implementing measures and practices that:

- Ensure the security and confidentiality of all Client Information. “*Client Information*” is defined as any paper or electronic record containing nonpublic, personally identifiable information that AHC may receive in the process of providing services, whether from the Client directly or a third party.
- Protect against any anticipated threats or hazards to the security or integrity of such information.
- Protect against unauthorized access to or use of such information that could result in substantial harm or inconvenience to Clients.
- Provide notice to Clients in the event a breach in the security protecting the information occurs.
- Ensure proper disposal of Client information.

AHC uses several strategies to implement its Privacy Policy (“Policy”):

- Informing Clients of the Privacy Policy through the Distribution of a Privacy Notice.* Upon entering individualized program services, all AHC clients are provided a Privacy Notice (see Exhibit A) or a similar program-specific privacy/disclosure statement for review and discussion, of which a signed copy is retained in the Client file. Clients receive additional Privacy Notices annually thereafter for the duration of the Clients’ relationship with AHC. Such notice will be mailed during the first quarter of the calendar year to all clients that are actively participating in individualized program services and/or that have a balance on a loan that AHC is responsible to service. Such notices are mailed to the last known address or delivered in person.
- Appointment of a Policy Coordinator.* This position insures regular attention is provided to the Policy assigning responsibility and demanding accountability for all aspects of the Policy. This role is currently performed by AHC’s Portfolio Manager, with support and oversight by the Executive Director.
- Information Systems Safeguards.* AHC hires professional information technology staff to: (i) Annually review any and all information and information processing systems, and (ii) Respond as needed to any system failures, concerns and problems. Information systems and electronic records are safeguarded by limiting access to necessary and authorized personnel; use of secure password-protected systems in which passwords are of at least medium complexity and changed routinely; routine correction of software vulnerabilities; permanent removal of Client Information from all electronic media prior to disposal; protection from physical hazards such as fire or water damage; and routine maintenance and proactive intervention to occur at least quarterly to detect, prevent and respond to network attacks or system failures.

- D. *Employee Commitment & Training.* New employees receive a copy of the Employee Policy Manual and are required to certify in writing they understand and will adhere to all policies, including the Privacy Policy. The Policy Coordinator trains new employees and provides annual training to all existing employees on the Privacy Policy. AHC imposes disciplinary measures for any security breaches, up to and including termination.
- E. *Safeguard and Secured Destruction of Records.* Records are safeguarded through storage in a secure place with limited access, including use of locked rooms and file cabinets; protection from physical hazards such as fire or water damage; and proper disposal through secured destruction methods that include an authorized vendor utilizing locked storage bins and off-site shredding. The Policy Coordinator will make weekly random checks to insure guidelines are being followed.
- F. *Service Providers.* The Policy Coordinator must identify Service Providers with access to Client Information, and ensure that reasonable steps are taken to select and retain Service Providers that are capable of maintaining appropriate safeguards for Client Information and must require Service Providers, by contract, to implement and maintain such safeguards.
- G. *Notifying Clients of a Security Breach.* All clients shall be notified at no charge if there has been a security breach. Such notice will be made in the most expedient time possible and without unreasonable delay, consistent with any measures necessary to determine the scope of the breach and restore the reasonable integrity, security and confidentiality of the data system. The notice may be provided in writing or electronically so long as the electronic notice is consistent with Illinois law. All relevant funding and reporting agencies will be informed of breaches that impact more than 1,000 Client households, including the submission of a report within 5 business days to the Illinois General Assembly. All notices will minimally include a listing of the breaches and an outline of corrective measures that have been taken to prevent future breaches.

## **EXHIBIT A**

### **SAMPLE PRIVACY NOTICE**

Affordable Housing Corporation of Lake County (AHC) would like to advise you of its privacy policies. Clients receiving individual counseling and program services often require the collection of non-public personal information from your application and consumer reporting agencies. This non-public personal information may include your address and other contact information, demographic background, application status, family income, social security number, employment information, collection and repayment history, and credit history.

We disclose non-public personal information to third parties in these instances: only as necessary to process and service your application, only as necessary to effect, administer or enforce the terms of the services provided to you; with your consent; or as permitted or provided by applicable laws, including the Illinois Freedom of Information Act ("FOIA") and the Privacy Act of 1974. Applicable laws permit disclosure to third parties for certain purposes. Examples of such disclosures include (i) disclosure in connection with enforcement purposes or litigation, audits or other investigations; (ii) to comply with proper requests under FOIA or other federal, state, or other local laws and regulations; and (iii) to federal and state agencies to the extent specifically permitted or required by law.

We do not sell or otherwise make available any information about you to any third parties for marketing purposes.

AHC protects the security and confidentiality of non-public personal information by limiting and monitoring all physical access to sites where non-public personal information is kept. A complete copy of our written privacy policy is available upon request.

Please direct any questions to our Executive Director at 847/263-7478.