CITY OF BEND

# Personally Identifiable Information (PII)

## Policy No. IT-0005

**City Manager Administrative Policy**

Bend Code Chapter 1.30.005 provides for 'City Manager Authority to Adopt Administrative Regulations, Policies and Guidelines.' All regulations, policies and guidelines adopted by the City Manager shall be consistent with the City of Bend Charter, the Bend Code, and Council ordinances.

The following policy conforms to the above stated standards.

Authorized by City Manager:

Signed by:

*Eric King*

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Eric King, City Manager

Dated: 12/30/2025

Reviewed by Legal Counsel:

Signed by:

*Ian Leitheiser*

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Ian Leitheiser, City Attorney

Dated: 12/30/2025

# I.  Purpose

It is the City of Bend's responsibility to protect the privacy of Personally Identifiable Information (PII) under its control. The City of Bend also recognizes personnel whose job requires interaction with PII should have access to such data.  This policy establishes the principles and requirements for the collection, use, storage, transmission, and disposal of PII to ensure compliance with applicable laws, regulations, and industry standards.

# II.  Policy Statement

It is the City of Bend's policy that all personnel, including employees, volunteers, interns, vendors, and contractors, are responsible for the protection of PII and compliance with applicable federal, state, and local laws and regulations.

# III. Scope

This policy applies to all City of Bend employees, volunteers, interns, vendors, and contractors, that utilize City technology or access City of Bend data that could contain PII information.

# IV. Definitions

**Personally Identifiable Information (PII):** Information that can be used to identify an individual, whether on its own or in combination with other personal or identifying information that is linked or linkable to an individual. Examples of PII include (but are not limited to) any of the following in combination with a person's first name or initial and last name.

•   Social Security Number

•   State driver license or identification card number

•   Passport number

•   Financial account number in combination with an access code such as a PIN or password

Even when not combined with a person's name, the data listed above can represent PII if the information obtained is enough to result in the theft of the person's identity.

**Data Loss Prevention (DLP):** refers to a set of technologies, strategies, and processes used to prevent sensitive or confidential data from being lost, misused, or accessed by unauthorized users. The goal of DLP is to ensure that critical information—such as personally identifiable information (PII), financial data, intellectual property, or trade secrets—does not leave the organization's network or systems inappropriately.

# V. Policy Terms & Provisions

## A. Protection and Handling of PII

1. In addition to complying with all applicable Federal and State law requirements, the City of Bend will further limit the collection, use, disclosure, transmission, storage and/or disposal of PII.

2. To protect PII against inappropriate access, use, disclosure, or transmission, the City of Bend requires appropriate administrative, technical and physical safeguards.

   a. Departments are responsible for documenting any departmental specific process involving the handling of PII.

   b. Departments are responsible for documenting systems and the location where PII data is used and stored.

   c. Access to PII from remote locations requires documented approval by the City of Bend's IT Director and Information Security Manager.

3. Collected PII will be appropriate for the intended and authorized use. Collection will be conducted according to best practice and legal requirements for the type and purpose of PII collected. Since the collection process itself can potentially lead to unintended PII disclosure, considerations of confidentiality in collection and recording will be explicitly addressed.

4. Those with access to PII are responsible for minimizing the use and aggregations of PII. The risk of unauthorized disclosure of, or access to, PII increases with the amount of data collected and stored. Those with access to PII are responsible for ensuring that the number and scope of physical and electronic copies and repositories of PII are kept to the minimum necessary and only for the period when a valid business need for the information exists.

5. Only those permitted under City of Bend policies with a legitimate "need to know" business purposes are authorized to access, use, transmit, handle or receive PII. Such authorization only extends to the specific PII for which the relevant individual has a legitimate "need to know" for the purposes of performing their City of Bend job duties.

6. City of Bend may release PII to third parties only as permitted by the City of Bend policy. Third party contractors to whom the City of Bend is disclosing PII must be bound by agreements with appropriate PII safeguarding and use provisions.

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7. Only authorized individuals may engage in oral communications involving PII. Caution is required in all oral communications involving PII, and oral communications involving PII may not take place in any location where an individual not authorized to access the PII may overhear the communication.

8. PII will be stored only when necessary and permitted under City of Bend policies.

   a. Approved departmental processes will dictate where PII resulting from said process is stored on City storage locations.

   b. Storage locations of PII will only be accessible to those requiring access to the PII in question and only after the person has met the proper training requirements.

   c. Where possible, PII storage locations will implement Data Loss Prevention (DLP) policies to prevent loss of data.

   d. Electronic documents containing PII, which are removed from a secure storage location, will be secured using encryption or password protection using a strong password (as defined in the City of Bend Password Policy).

   e. Where practical, automated retention policies should be used to delete PII when retention requirements indicate they are no longer needed.

9. PII may not be transmitted to external parties outside the City of Bend without appropriate security controls.

   a. All digital forms of Personally Identifiable Information (PII) transmitted within or outside the organization must be encrypted. The City of Bend will apply Data Loss Prevention (DLP) policies to automatically enforce encryption on digital PII wherever possible. Employees are also expected to manually encrypt any data they know contains PII prior to transmission. The City will take all reasonable measures to ensure encryption is consistently applied, including the implementation and maintenance of DLP technologies.

   b. Verification of intended recipients is critical. Addresses, email, phone and FAX numbers must be verified prior to sending any PII.

10. Before accessing, handling, transmitting, or receiving PII data, City of Bend personnel identified as requiring access to PII are responsible for completing appropriate training on City of Bend information privacy policies. Training should be ongoing to reflect changes in City of Bend policies and regulatory laws.

11. Known or suspected breaches of this policy, accidental or malicious, will be immediately reported by the person making the discovery to the Information

Security Manager and a direct Supervisor. The Information Security Manager will investigate, and document incidents related to any reported PII data breach. Examples of possible violations include misplacing a paper report, laptop, mobile device or removable media containing PII, the accidental email transmission of PII or a possible virus or malware infection on a computer with access to PII.

**Language Assistance Services & Accommodation Information for People with Disabilities**
You can obtain this information in alternate formats such as Braille, electronic format, etc. Free language assistance services are also available. Please contact Adam Young at **ayoung@bendoregon.gov** or 541-383-4884. Relay Users Dial 7-1-1.

**Servicios de asistencia lingüística e información sobre alojamiento para personas con discapacidad**
Puede obtener esta información en formatos alternativos como Braille, formato electrónico, etc. También disponemos de servicios gratuitos de asistencia lingüística. Póngase en contacto con Adam Young en **ayoung@bendoregon.gov** o 541-678-3309.  Los usuarios del servicio de retransmisión deben marcar el 7-1-1.