

Privacy Tip of the Week
West Virginia Executive Branch
Privacy Tips – Security Safeguards, Minimum Necessary

Managing Vendors

Question:

The State Program that I work for uses a private vendor to transcribe clinic dictation. What do we need to do to ensure that the vendor is safeguarding the information of our clients?

Answer:

Do you work with any third parties who process personally identifiable information (PII), such as social security numbers, driver's license numbers or employee home addresses, for your Department? Every agency uses some third party data processors, such as the companies that provide benefits to us as government workers. Agencies also provide vendors with incidental access to PII, such as to companies that maintain our computer systems, provide training, or perform other services for us.

Here are some guidelines for protecting PII when we use service providers:

- ✓ Confirm that the service provider has an appropriate contract or is otherwise bound to protect the PII. All vendors should agree to limit their use of PII to the purposes in the contract and to have reasonable security for the PII.
- ✓ Understand the scope of the service provider's contract. Do not provide sensitive PII to a vendor that has only been hired to process less sensitive information. The vendor may not have appropriate controls in place for sensitive PII.
- ✓ Only allow the service provider access to PII that is necessary to perform the services for you. For example, if you use a company to do a mailing for you, only provide it with the names and addresses for the letters. Do not expect the vendor to remove or ignore unneeded PII – remove it before the file is sent!
- ✓ Ensure that the vendor knows what to do if it has a security incident that compromises PII. Incidents must be reported to

- (1) the Agency contract manager whose contact information may found at www.state.wv.us/admin/purchase/vrc/agencyli.htm and,
- (2) unless otherwise directed by the Agency in writing, the Office of Technology at www.incident@wv.gov.

- ✓ If a vendor ever tells you about an incident, be sure to contact the Office of Information Security and Controls (OISC) by one of the following methods:
 - (1) e-mailing incident@wv.gov with a subject line of “INCIDENT”;
 - (2) going to the West Virginia Office of Technology (WVOT) Web Site at <http://www.technology.wv.gov>, clicking on “Report an Incident”, and filling out an Incident Report Form; or
 - (3) contacting the WVOT Service Desk at servicedesk@wv.gov or by phone at 304-558-9966 or 877-558-9966.

And remember to notify your supervisor or manager immediately!