

## **West Virginia Executive Branch Privacy Tip of the Week**

### **Using Privacy Notices Internally**

#### **Question:**

I know - it seems like I have a new question about personally identifiable information (PII) every week. So here's my question this week: if my Department has collected PII for one reason (i.e. application for services) can we use it for something else (research, sharing with another program, etc.)?

#### **Answer:**

Privacy notices are generally used by individuals outside the Department who want to understand how the Department uses personally identifiable information, (PII), like medical information, dates of birth and Social Security Numbers. But privacy notices should also be used within the Department, as a guide to our own actions with PII.

Our uses of PII change over time. As processes evolve, we may also need different types of PII. For example, we may allow individuals to pay for services using credit cards instead of cash. This evolution requires us to collect and process credit card information. We may allow individuals to obtain services online. This change may require us to authenticate individuals electronically. In every case, the boundaries of what we can do are determined by both law and our privacy notices.

Before you change the way you collect PII or the specific elements of PII that are collected, review the privacy notice. Make sure that the new process is consistent with the privacy notice. If it's not consistent, talk with your manager or Privacy Officer about whether the change is okay. You may have to update the privacy notice before you make the change.

Similarly, if you want to use PII for a new purpose, examine the privacy notice to see if the new use is already described in the notice. (Often notices will inform people about uses that we imagine making in the future.) If the privacy notice does not cover your new use, you'll have to talk with your manager or the Privacy Officer before you can use the PII.