

**West Virginia Executive Branch
Privacy Policy: Minimum Necessary and Limited Use**

Obtaining Personal Information (PI) From Third Parties

Question:

Is it OK to receive personal information, (PI), from third party sources?

Answer:

Sometimes it's not possible to obtain a person's personal information, (PI), directly from the person. In this case, you may obtain a person's PI from another individual, such as a relative. You may also routinely obtain PI from third party data suppliers, such as consumer reporting agencies or identity verification companies. How does the Minimum Necessary and Limited Use Policy affect us when we obtain PI from third parties?

The Minimum Necessary and Limited Use Policy *permits* us to obtain the PI we need from third party sources. However, we have to limit the PI we obtain from the third party to that which we need for the task at hand and for legal compliance. This means:

- ✓ If you need to collect some additional information from the third party for verification purposes (such as proof of a relationship), that's okay.
- ✓ If you use an online database service, you should limit your search to those that are designed to give you the PI you need. For example, if you are verifying a person's address, you do not need to search or record his Social Security number.
- ✓ You must confirm that the third party data supplier is appropriate for your task. For example, if you are conducting a background check on a prospective worker, you must obtain information from government agencies or from consumer reporting agencies. It is not appropriate to use general Internet services (such as Google or MySpace) for worker background screening.
- ✓ You can only use PI obtained from third parties for the purpose for which it was obtained and as needed to comply with laws.

If you have any questions about the collection or use of PI from third parties, please contact your Privacy Officer.