

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

Sharing the “Minimum Necessary”

Question:

What should I do if I am unsure about personal information, (PI), I am sending a vendor?

Answer:

Whenever you disclose personal information, (PI), to a third party, such as co-worker, service provider or representative of another agency, you should only disclose those elements of PI that the recipient needs. This means that you may have to take steps to redact documents or remove unnecessary elements from the file.

For example, imagine that you work in human resources, and you want to send a file of worker information to a vendor who will mail letters to the workers about a new benefits program. You need to provide the vendor with a file that contains the workers’ names and addresses, along with a copy of the letter to be mailed. You need to be sure that the file does not include other worker PI such as Social Security numbers or employee ID numbers. The vendor does not need these data elements to complete the mailing project.

If you have questions about whether PI should be sent to a third party or how to remove unnecessary PI, please talk to your manager or your Privacy Officer.