

Reference: HUMAN RESOURCES
Section: WORK RULES
Title: CONFIDENTIALITY OF PERSONAL EMPLOYEE INFORMATION
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I. PURPOSE

The purpose of this policy is to define the position of the Niagara Frontier Transportation Authority and the Niagara Frontier Transit Metro System, Inc. (collectively referred to as "NFTA" or "Authority") on the confidentiality of personal employee information.

II. APPLICABILITY

This policy applies to all Authority employees who come into contact with personal employee information.

III. POLICY

It is the policy of Authority to ensure the confidentiality of personal employee information in its possession. In conformance with this policy, the Authority will only collect personal information that is required to conduct its operations and to comply with government reporting and disclosure requirements. Personal employee information that is maintained by the Authority and is to be treated as confidential includes, but is not limited to, employee names, addresses, telephone numbers, emergency contact information, Equal Employment Opportunity data, social security numbers, date of birth, employment eligibility data, payroll information, benefits plan enrollment information, which may include dependent personal information, and education or certification credentials. Medical information on employees is also confidential and is maintained in a locked, segregated area.

Personal employee information will be considered confidential and as such, will be shared only as required with those who have a need to access such information, or where authorized by the employee or required by law. Hard copy records will be maintained in locked, secure areas. Personal employee information used in business system applications will be safeguarded under the Authority's proprietary electronic transmission and intranet policies and security systems. Participants in the Authority's benefit plans should be aware that personal information will be shared with plan providers as required for their claims handling or record keeping needs. Employees in positions that require the handling of personal employee information are expected to use discretion when dealing with such information. Unauthorized disclosure of personal employee information may lead to legal and/or disciplinary action.

If an employee becomes aware of a material breach in maintaining the confidentiality of their personal employee information, the employee should report the incident to the Director of Human Resources. If it is believed that the Director of Human Resources has violated this policy, the employee should contact any officer of the Authority.