

PRIVACY NOTICE

Liberty Community Services, Inc.
October 3, 2005

THIS NOTICE DESCRIBES HOW PERSONAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION.
PLEASE REVIEW IT CAREFULLY.

Liberty Community Services, Inc. (referred to below as “we”) is required to maintain the privacy of your personal information and wants you to know about our practices for protecting such information. We are required by law to abide by the terms of this notice. Our employees, volunteers, affiliates and contractors are also required to abide by the terms of this notice.

The information that is protected by our privacy practices and this notice is known as Protected Personal Information. Protected Personal Information includes all information we collect or maintain about a living homeless client or homeless individual that: (1) identifies, either directly or indirectly, a specific individual; (2) can be manipulated by a reasonably foreseeable method to identify a specific individual; or (3) can be linked with other available information to identify a specific individual. We may only use or disclose your Protected Personal Information for the purposes, and to the extent, described in this notice. The Protected Personal Information that we collect must be relevant to the purpose for which it is to be used.

We reserve the right to change our privacy practices and this notice at any time. Any changes to our privacy practices and this notice will be effective for all information we maintain, including information collected prior to such a change. This notice is effective as of the date set forth above.

We collect personal information directly from you for reasons that are discussed in this privacy statement. We may be required to collect some personal information by law or by organizations that give us money to operate this program. Other personal information that we collect is important to run our programs, to improve services for homeless persons, and to better understand the needs of homeless persons. We only collect information that we consider to be appropriate.

Uses and Disclosures:

We collect Protected Personal Information in order to provide and coordinate services, obtain payment or reimbursement for our services, to perform administrative functions, to maintain statistical records regarding our clients and for the other purposes stated in this privacy notice. Except as provided in this notice, we will obtain your written authorization prior to using or disclosing your Protected Personal Information. Notwithstanding the foregoing, **WE MAY USE OR DISCLOSE YOUR PROTECTED PERSONAL INFORMATION WITHOUT YOUR AUTHORIZATION FOR THE FOLLOWING PURPOSES:**

- **Provision of Services.** We may disclose or use your Protected Personal Information to provide or coordinate services to an individual
- **Payment or Reimbursement.** We may disclose or use your Protected Personal Information for purposes related to payment or reimbursement for services that we provide (e.g. disclosures to the U.S. Department of Housing and Urban Development, State of Connecticut Department of Mental Health and Addiction Services, State of Connecticut Department of Social Services, The Connecticut AIDS Residence Coalition, City of New Haven Health Department).
- **Administrative Functions.** We may disclose or use your Protected Personal Information in connection with administrative functions, including, but not limited to legal, audit, personnel, oversight and management.

- **De-Identified Protected Personal Information.** We may disclose or use your Protected Personal Information to create de-identified Protected Personal Information.
- **Compliance with Laws.** We may disclose or use Protected Personal Information if required by law, to the extent that the use or disclosure complies with and is limited to the requirements of the law.
- **Prevention of Serious Threats to Health or Safety.** We may disclose or use Protected Personal Information if, in good faith, we believe the use or disclosure is necessary to prevent or lessen a serious and imminent threat to the health or safety of an individual or the public and the use or disclosure is made to a person reasonably able to prevent or lessen the threat, including, without limitation, the target of the threat.
- **Protection of Victims of Abuse, Neglect or Domestic Violence.** We may use or disclose Protected Personal Information to a governmental entity (including, without limitation, social services or protective services agencies) authorized by law to receive reports of abuse, neglect or domestic violence about an individual that we reasonably believe to be a victim of abuse, neglect or domestic violence, but only if: (a) disclosure is required by law and complies with and is limited to the requirements of the law; (b) the individual agrees to the disclosure; OR (c) the disclosure is expressly authorized by statute or regulation and we believe the disclosure is necessary to prevent harm to the individual or other potential victims. Additionally, if an individual is unable to agree to a disclosure due to incapacity, we may disclose Protected Personal Information to a law enforcement or other public official authorized to receive the report if such official represents that the information for which disclosure is sought is not intended to be used against the individual and that an immediate enforcement activity that depends on the disclosure would be materially and adversely affected by waiting until the individual is able to agree to the disclosure. If we make a disclosure about victims of abuse, neglect or domestic violence, we must promptly inform the individual that a disclosure has been made or will be made unless we believe the individual would put himself/herself at risk of serious harm or we would be informing a personal representative (e.g. friend or family member) that we believe is responsible for the abuse, neglect or domestic violence and that informing the personal representative would not be in the individual's best interests.
- **Academic Research.** We may use or disclose Protected Personal Information for academic research conducted by an individual or institution that has a formal relationship with us if the research is conducted either: (a) by an individual employed by or affiliated with the organization for use in a research project conducted under a written research agreement approved in writing by a program administrator (other than the individual conducting the research) designated by us; OR (b) by an institution for use in a research project conducted under a written research agreement approved in writing by a program administrator designated by us.
- **Law Enforcement Purposes.** We may use or disclose Protected Personal Information for a law enforcement purpose to a law enforcement official under any of the following circumstances: (a) in response to a lawful court order, court-ordered warrant, subpoena or summons issued by a judicial officer, or a grand jury subpoena; (b) if a law enforcement official makes a written request for protected personal information that: (1) is signed by a supervisory official of the law enforcement agency seeking the Protected Personal Information; (2) states that the information is relevant and material to a legitimate law enforcement investigation; (3) identifies the Protected Personal Information sought; (4) is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought; and (5) states that de-identified information could not be used to accomplish the purpose of the disclosure; (c) if we believe in good faith that the Protected Personal Information constitutes evidence of criminal conduct that occurred on our premises; (d) in response to an oral request for the purpose of identifying or locating a suspect, fugitive, material witness or missing person and the Protected Personal Information disclosed consists only of name, address, date of birth, place of birth, Social Security Number, and distinguishing physical characteristics; OR (e) if the official is an authorized federal official seeking Protected Personal Information for the provision of protective services to the President or other persons authorized by 18 U.S.C. 3056, or to foreign heads of state or other persons authorized by 22 U.S.C. 2709(a)(3), or for the conduct of investigations authorized by 18 U.S.C. 871 and 879 (threats against the President and others) and the information requested is specific and limited in scope to the extent reasonably practicable in light of the purpose for which the information is sought.
- **Partners and Sharing of Data.** We may maintain common data storage with another organization and may share Protected Personal Information with such organizations. We may allocate responsibilities for

protecting Protected Personal Information between ourselves and such organizations. These organizations may have differing privacy policies than we maintain.

Your Rights:

- **Inspection and Copying.** Subject to the other provisions of this privacy notice, we must allow you to inspect and copy any of your Protected Personal Information by written request. Upon your request, we will explain any information that you do not understand. We reserve the right to deny any request for inspection or copying of: (1) information in preparation for litigation, (2) information about another individual (other than a health care or homeless service provider), (3) information obtained under promise of confidentiality (other than a promise to a health care or homeless service provider), if disclosure would reveal the source of the information, or (4) information, the disclosure of which would be reasonably likely to endanger the life or physical safety of an individual.
- **Correction of Information.** We will consider any request you make for correction of inaccurate or incomplete Protected Personal Information pertaining to you. We may elect not to remove any incorrect or inaccurate information, but may mark such information as inaccurate or incomplete and may supplement it with additional information.
- **Denial of Requests for Inspection, Copying and/or Correction.** We may reject or refuse any repeated or harassing requests for inspection, copying and/or correction of Protected Personal Information. If we deny your request for inspection, copying and/or correction of your Protected Personal Information, we must explain the reason for the denial to you and must include documentation of the request and the reason for denial as part of your Protected Personal Information.
- **Copy of This Privacy Notice.** We must provide you with a copy of this privacy notice upon your request.
- **Complaints.** If you are concerned about a possible violation of our privacy practices, or you have any other complaint concerning our privacy practices or your Protected Personal Information, you may file a complaint with our complaint department at:

Liberty Community Services, Inc.
HMIS Complaint Department
254 College Street, 2nd Floor
New Haven, CT 06510
(203) 495-7600 Ext. 1748

Questions

If you have any questions about our privacy practices or would like more information you may contact the Liberty Community Services, Inc. at (203) 495-7600 x 1748

Revisions: