

TOWN OF EAST LONGMEADOW POLICY

Policy Title: Privacy Policy
Effective Date: 7/1/2026
Policy Number: 155-014 IT-Privacy Policy
Policy Owner: Information Technology Department
Level: Department () - Division () - **Town Wide (X)**



1. Introduction

The Town of East Longmeadow is committed to protecting the privacy of residents, employees, students, visitors, and anyone who interacts with Town systems, services, and websites. This Privacy Policy explains what information the Town collects, how it is used and protected, and the rights individuals have regarding their information.

2. Scope

This policy applies to:

- All Town departments, boards, committees, and employees
- Town-operated websites, applications, and online services
- Information systems owned, operated, or managed by the Town
- Third-party systems or vendors acting on behalf of the Town

This policy covers both electronic and physical records containing personal information. If a department or vendor already has a privacy policy, the more restrictive policy takes precedence.

3. Information We Collect

The Town collects information only as necessary to conduct official government business and provide services.

3.1. Personal Information

- Personal information may include, but is not limited to:
- Name, address, email address, and telephone number
- Date of birth or age
- Student or employee identifiers
- Government-issued identification numbers, when legally required
- Financial or billing information

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The Town reserves the right to modify this policy at any time.

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3.2. Automatically Collected Information

When you use Town websites or online services, limited technical information may be collected, such as:

- IP address
- Browser type and operating system
- Date and time of access
- Pages visited

This information is used for system security, troubleshooting, analytics, and service improvement.

4. How Information Is Used

Information collected by the Town is used to:

- Provide municipal, educational, and public safety services
- Comply with state and federal laws and regulations
- Communicate with residents and service users
- Process applications, permits, payments, and records requests
- Maintain the security and integrity of Town systems
- Student education records are used only for legitimate educational interests
 - Disclosure is limited to:
 - School officials with legitimate educational interest
 - Parents or eligible students
 - Parties authorized by FERPA

The Town does not sell or rent personal information.

5. Disclosure of Information

Personal information may be disclosed only:

- When required or permitted by law
- To Town employees who require access to perform their duties
- To third-party vendors or service providers under contract with the Town
- In response to lawful requests such as subpoenas or court orders
- Vendors must agree in writing to maintain safeguards consistent with 201 CMR 17.00
- Contracts include data protection and breach notification requirements
- Vendors supporting educational services act as school officials and are bound by FERPA confidentiality requirements

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All vendors handling Town data must comply with applicable privacy, confidentiality, and security requirements.

5.1. Public Records

The Town is subject to the Massachusetts Public Records Law. Certain records may be disclosed upon request unless an exemption applies. Personal information protected by law will be redacted where appropriate. Individuals who believe a public records request has been improperly denied may appeal to the Supervisor of Public Records pursuant to M.G.L. c. 66, §10A.

6. Data Security

The Town employs administrative, technical, and physical safeguards to protect information, including:

- Access controls and authentication requirements
- Network and system security monitoring
- Data encryption where appropriate
- Regular risk assessments and policy reviews
- The Town maintains a Written Information Security Program (WISP) in accordance with 201 CMR 17.00
 - The WISP includes administrative, technical, and physical safeguards
 - The program is reviewed at least annually or after a security incident
- Role-based access to systems containing personal information
- Access is limited to employees with a legitimate business need
- Timely removal of access upon termination or role change
- Encryption of personal information when transmitted over public networks
- Encryption of personal information stored on portable devices and laptops

6.1. CJIS

- Criminal Justice Information (CJI) is restricted to authorized personnel only
- Access is granted based on role, background screening, and training
- Multi-factor authentication is required for CJIS systems
- Access to CJIS systems is logged and monitored
- Logs are reviewed in accordance with CJIS requirements
- Physical access to CJIS systems and locations is controlled and restricted
- Incidents involving CJIS data are reported and handled in accordance with CJIS Security Policy and applicable law

Despite these measures, no system can be guaranteed to be completely secure.

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7. Data Retention

Information is retained in accordance with:

- Massachusetts records retention schedules
- Applicable state and federal laws

Information is securely disposed of when no longer required.

8. Third-Party Services and Links

Town websites may contain links to third-party websites or services. The Town is not responsible for the privacy practices of external entities. Users are encouraged to review the privacy policies of those sites.

9. Children's Privacy

The Town does not knowingly collect personal information from children except as required for educational or municipal services and in compliance with applicable laws.

10. Your Rights

Under Massachusetts and applicable federal law, individuals have the following rights:

- Request access to their personal information
- Request correction of inaccurate information
- Ask questions about how information is used or disclosed
- Right to inspect and review education records
- Right to request correction of inaccurate or misleading records
- Right to file a complaint with the U.S. Department of Education

Requests should be directed to the Town Clerk or designated Records Access Officer. Contact information is available on the Town's website at www.eastlongmeadowma.gov.

11. Data Breach Notification

In the event of a breach of security involving personal information as defined under M.G.L. c. 93H, the Town will take prompt action to contain the breach, assess the scope and nature of the incident, and notify affected individuals and required government agencies as required by law.

- **Notification to Affected Individuals.** The Town will notify affected Massachusetts residents as expeditiously as possible, without unreasonable delay, following the discovery of a breach. Notice will be provided by written letter, electronic notice (where the affected individual has

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consented to electronic communications), or substitute notice where direct contact is not reasonably practicable. Substitute notice may include conspicuous posting on the Town's website and notification to major statewide media.

- **Notice to State Agencies.** The Town will simultaneously notify the Massachusetts Attorney General's office and the Office of Consumer Affairs and Business Regulation (OCABR) of any breach affecting Massachusetts residents, consistent with M.G.L. c. 93H, §3.
- **Vendor-Initiated Breaches.** If a Town vendor or service provider discovers or reasonably believes that a breach of the Town's personal information has occurred, the vendor must notify the Town promptly so the Town may fulfill its statutory notification obligations.
- **Breach Response.** The Town maintains incident response procedures as part of its Written Information Security Program (WISP). The Town's designated Privacy or Security Officer is responsible for coordinating breach response, working with relevant departments, legal counsel, and law enforcement as appropriate.

Nothing in this section limits any other obligation to report or respond to a security incident under applicable law, including CJIS Security Policy or FERPA requirements.

12. Policy Updates

This Privacy Policy may be updated periodically to reflect changes in law, technology, or Town practices. Updates will be posted on Town websites where applicable.

Date	Action	Effective Date
2/25/2026	Establishing Policy - RQ	

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Appendix A - Regulatory Compliance Mapping

This appendix provides a high-level mapping of the Town of East Longmeadow Privacy Policy to applicable privacy and data security regulations. It is intended to support audits, reviews, and governance oversight.

1. Massachusetts Data Security Regulation (201 CMR 17.00)

Regulatory Focus: Protection of personal information of Massachusetts residents through administrative, technical, and physical safeguards.

Requirement	Policy Alignment
Written Information Security Program (WISP)	Section 6 establishes the Town’s administrative, technical, and physical safeguards and references formal security governance.
Definition of Personal Information	Section 3 defines personal information consistent with Massachusetts standards.
Access Controls and Least Privilege	Section 6 limits access to authorized personnel with a legitimate business need.
Encryption of Personal Information	Section 6 addresses encryption of data in transit and at rest, where appropriate.
System Monitoring and Risk Assessment	Section 6 references monitoring, safeguards, and regular risk reviews.
Vendor Data Protection Obligations	Section 5 requires third-party vendors to comply with the Town's privacy and security requirements.

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Secure Disposal of Records Section 7 addresses secure retention and disposal in accordance with state schedules.

2. Family Educational Rights and Privacy Act (FERPA)

Regulatory Focus: Protection of student education records and rights of parents and eligible students.

Requirement	Policy Alignment
Definition of Education Records	Sections 4 and 9 address student-related information collected for educational services.
Legitimate Educational Interest	Section 4 limits the use of student information to official educational purposes.
Restrictions on Disclosure	Section 5 limits disclosure of student records to authorized parties.
Parent and Student Rights	Section 10 acknowledges the right to access and request the correction of records.
Vendors as School Officials	Section 5 requires vendors to maintain confidentiality and comply with applicable laws.
Compliance with Federal Education Law	Sections 4 and 9 affirm compliance with applicable state and federal regulations.

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3. Criminal Justice Information Services (CJIS) Security Policy

Regulatory Focus: Protection, access control, and accountability for Criminal Justice Information (CJI).

Requirement	Policy Alignment
Restricted Access to CJI	Sections 5 and 6 limit access to authorized personnel only.
Role-Based Access and Authorization	Section 6 establishes access controls based on job function.
Authentication and Monitoring	Section 6 references authentication, logging, and monitoring of systems.
Physical Security Controls	Section 6 includes physical safeguards for Town systems and records.
Incident Handling and Reporting	Section 6 and Section 12 reference incident response and policy updates.
Vendor and Third-Party Compliance	Section 5 requires vendors handling sensitive data to meet security obligations.

4. Governance and Oversight

The Town of East Longmeadow supports ongoing privacy and security compliance through:

- Periodic policy review and updates
- Risk assessments and security planning
- Employee training and awareness
- Oversight of third-party service providers

This appendix is intended as a governance and audit reference and does not replace the detailed requirements of applicable laws or regulations.

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