



PA TURNPIKE COMMISSION POLICY

This is a statement of official Pennsylvania Turnpike Policy

NUMBER: 10.02

APPROVAL DATE: 12.02.2003

EFFECTIVE DATE: 12.17.2003

REVISED DATE: 06.02.2015

POLICY SUBJECT:

E-ZPass Customer
Information Privacy Policy

RESPONSIBLE DEPARTMENT:

Communications & Public Relations

A. PURPOSE:

The purpose of this policy is to define who may have access to E-ZPass customer account information, and under what circumstances the information may be released.

B. SCOPE:

1. Confidentiality Agreements

All Commission employees, both permanent and temporary, and all permanent and temporary employees of the Commission's contracted service provider, who are granted access to customer account information, must sign a confidentiality agreement. It will be the responsibility of the Chief of Communications & Public Relations or designee to enforce this policy and to maintain on file the confidentiality agreements signed by Commission employees. It will also be the responsibility of the Chief of Communications & Public Relations or designee to ensure that the Commission's contracted service provider enforces this policy with its employees and maintains those agreements on file.

2. Requests from Customers to the E-ZPass Customer Service Center for Customer Account Information

Except as provided within this policy, customer account information may only be disclosed to the account holder. Customer service representatives must verify the identity of every caller or walk-in visitor as the account holder before they confirm or disclose any account details. Refer to Section E.1 below for procedures governing the verification of identity.

3. External Requests from Third Parties

- a. Access to E-ZPass customer account information by external third parties will only be provided pursuant to a subpoena or other written judicial order issued to a law enforcement official, except as provided in Section E.2.b below. Refer to Section E.2 below for procedures governing the release of customer information pursuant to a subpoena or other written judicial order.

- b. Customers may request that family members or other representatives be granted access to their customer account information. Commission employees receiving these requests must refer the matter to the Chief of Communications & Public Relations or designee. Refer to Section E.3 below for procedures to grant access to representatives.

4. Internal Requests from Commission Personnel – Occasional Access

- a. Certain employees may need occasional access to E-ZPass customer account information through the normal course of their duties and responsibilities. All requests for access to customer account information must be made to the Chief of Communications & Public Relations or designee. The request must include a written description of the specific need and the concurrence of the requestor's department head.
- b. Commission employees may not contact the Commission's contracted service provider directly, unless specifically authorized to do so by the Chief of Communications & Public Relations or designee. Refer to Section E.4 below for procedures governing the release of E-ZPass customer account information to Commission employees on an occasional basis.

5. Internal Requests from Pre-Approved Commission Employees – Regular Access

Certain Commission employees, including Audit employees, approved by the Chief of Communications & Public Relations or designee, may need regular access to E-ZPass customer account information through the normal course of their duties and responsibilities, including the performance of audit activities. Refer to Section E.5 below for procedures governing the release of E-ZPass customer account information to pre-approved Commission employees on a regular basis.

C. GENERAL POLICY:

All information kept by the Commission, its authorized agents and or its employees, which is related to the account of an electronic toll collection system account holder shall be for the exclusive use of the Commission, its authorized agents, its employees and law enforcement officials for the purpose of discharging their duties. Said information may only be released to external parties in accordance with Pennsylvania law and the provisions of this policy.

D. DEFINITIONS:

E-ZPass Customer Account Information – All information kept by the Commission, its authorized agents and/or its employees, which is related to the account of an electronic toll collection system account holder. Said information shall include, but not be limited to, name, address, telephone numbers, other contact information, credit card and checking account information, and employer identification numbers, surety information, etc.

E. PROCEDURES:

1. Procedure Governing the Verification of Identity

To verify identity, the caller or visitor must be listed on the E-ZPass account and provide the following information:

- Account Number
- Personal Identification Number (PIN)
- Name on Account

If the caller or visitor is listed on the account but is unable to provide the above-referenced information, the caller or visitor must be able to provide correct responses to three (3) of the questions listed below. The caller or visitor must provide a correct response to at least one of the questions identified with an asterisk (*).

- What is the account number?*
- What is the PIN?*
- What is the account holder's driver's license number or, for a business, the Employer Identification Number (EIN)?*
- What are the last four (4) digits of the credit card number or bank account number (only for automatic replenishment customers)?*
- What is the user name on the account?*
- What is the transponder number on the account?
- What is the e-mail address on the account?
- What is the license plate listed on the account?
- What is the name on the account? If it is a business, what is the business contact name as well as the company name?

2. Procedure Governing the Release of Customer Account Information Pursuant to a Subpoena or Other Written Judicial Order

- a. Anyone who receives a subpoena or other written judicial order, requesting the release of customer account information, should immediately notify the Commission's Legal Department.
- b. The Legal Department will make a determination as to the response to the subpoena or judicial order, consistent with 74 Pa.C.S. § 8117(b)(5) and (d)(2), and will direct the Commission's contracted service provider accordingly.
- c. The Commission's contracted service provider, upon receipt of a written directive from the Legal Department, will release the information to the Legal Department and establish a permanent record of the action taken, to include a copy of the original subpoena or judicial order, the Commission authorization to release the information, the person or entity to whom it was released, and the date of the release. All costs of complying with the request shall be borne by the issuer of the subpoena or judicial order.

3. Procedure to Grant Access to Representatives of Customers
 - a. If a customer desires that an external third party be given access to his or her customer account information, that customer must execute a written authorization which should then be faxed or mailed to the E-ZPass Customer Service Center.
 - b. When a written authorization is on file for the customer, the customer's designated representative must be positively identified in accordance with Section E.1. above, prior to the release of customer account information.

4. Procedure Governing the Release of E-ZPass Customer Account Information to Commission Employees – Occasional Access
 - a. When a Commission employee needs access to E-ZPass customer account information on an occasional basis through the course of his or her duties and responsibilities, the employee must submit a written request, approved by his or her department head, to the Chief of Communications & Public Relations or designee.
 - b. The request should be made at least five (5) working days prior to the need for information.
 - c. If the request is approved by the Chief of Communications & Public Relations or designee, the Commission's contracted service provider will release the information and log the inquiry in a permanent record that will include a copy of the original request, the approval by the Chief of Communications & Public Relations or designee, the person to whom it was released, and the date of the release.

5. Procedure Governing the Release of Customer Account Information to Pre-Approved Employees – Regular Access
 - a. Commission employees who require regular access to E-ZPass customer account information must be pre-approved by the Chief of Communications & Public Relations or designee and the Chief Compliance Officer or designee, and must sign confidentiality agreements.
 - b. A list bearing the names of the pre-approved employees will be provided to the Commission's contracted service provider annually.
 - c. Pre-approved employees should identify their presence to the Senior E-ZPass Customer Service Center management employee upon their arrival at the E-ZPass Customer Service Center or Violations Processing Center.
 - d. Pre-approved employees should also hold a brief departure interview with the Senior E-ZPass Customer Service Center management employee.

6. Procedure Governing the Release of Non-Revenue/Hybrid Customer Account Information to Commission Employees
 - a. When a Commission employee needs access to Non-Revenue/Hybrid E-ZPass customer account information through the course of his or her duties and responsibilities, the employee must complete a Request for PTC Employee E-ZPass (Non-Revenue) Account Information form and obtain all required approvals. This form is available from the PTC Compliance or ETC Departments.
 - b. The Request for PTC Employee E-ZPass (Non-Revenue) Account Information form will be provided to the Chief of Communications & Public Relations or designee to obtain the requested account information and provide it to the individual who submitted the request.

**AUTHORIZATION FOR RELEASE OF
CUSTOMER ACCOUNT INFORMATION**

In consideration for the provision of an E-ZPass non-revenue transponder for use on the Pennsylvania Turnpike, I hereby grant the Pennsylvania Turnpike Commission, its agents and employees access to my E-ZPass customer account information. I understand that this information is personal to me and may include financial information, including credit card and checking account information.

I agree to release and discharge the Pennsylvania Turnpike Commission from any and all claims, demands, and causes of action for any damage or injury of any kind or nature caused by, resulting from, arising out of, or occurring in connection with access to the above-mentioned E-ZPass customer account information.

I understand that this authorization will remain active and on file with the Pennsylvania Turnpike Commission, until I have returned my non-revenue E-ZPass transponder and canceled my E-ZPass account.

Employee Name (Print)

Employee Signature

Date

This Policy Letter supersedes all previous Policy Letters on this subject.



REQUEST for PTC Employee E-ZPass (Non-Revenue) Account Information

This form must be completed for all requests for PTC Employee E-ZPass Non-Revenue Account information. The information requested will be sent to the Case Investigator listed below unless otherwise indicated.

Case ID Number (If Applicable)		Case Investigator Making Request or Name of Auditor															
Name of PTC Employee Whose Data is Being Requested, if applicable:																	
Briefly describe, in details, the reason(s) for the request:																	
Please provide details regarding the Non-Revenue E-ZPass Account information requested. (Travel-specific information should be indicated in the next section.):																	
Date Range	Date Data Needed																
Special Notes/Instructions:																	
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border-top: 1px dashed black; padding-top: 10px;">Requestor Name</td> <td style="width: 30%; border-top: 1px dashed black; padding-top: 10px;">Requestor Signature</td> <td style="width: 20%; border-top: 1px dashed black; padding-top: 10px;">Date</td> </tr> <tr> <td colspan="3" style="padding: 10px 0 0 0;">Compliance Dept. Approval:</td> </tr> <tr> <td style="border-top: 1px dashed black; padding-top: 10px;">Compliance Officer Name</td> <td style="border-top: 1px dashed black; padding-top: 10px;">Compliance Officer Signature</td> <td style="border-top: 1px dashed black; padding-top: 10px;">Date</td> </tr> <tr> <td colspan="3" style="padding: 10px 0 0 0;">Legal Dept. Approval:</td> </tr> <tr> <td style="border-top: 1px dashed black; padding-top: 10px;">Legal Dept. Staff Name</td> <td style="border-top: 1px dashed black; padding-top: 10px;">Legal Dept. Staff Signature</td> <td style="border-top: 1px dashed black; padding-top: 10px;">Date</td> </tr> </table> <p style="margin-top: 10px;"><i>Approved requests should be submitted to Manager of ETC Customer Service Operations, ETC Dept.</i></p>			Requestor Name	Requestor Signature	Date	Compliance Dept. Approval:			Compliance Officer Name	Compliance Officer Signature	Date	Legal Dept. Approval:			Legal Dept. Staff Name	Legal Dept. Staff Signature	Date
Requestor Name	Requestor Signature	Date															
Compliance Dept. Approval:																	
Compliance Officer Name	Compliance Officer Signature	Date															
Legal Dept. Approval:																	
Legal Dept. Staff Name	Legal Dept. Staff Signature	Date															

Requests for information will not be provided until all approvals are received.