

Topic: Iowa UCC Question

Question by: Kyle Phillips

Jurisdiction: Iowa

Date: February 20, 2020

Jurisdiction	Question(s)
	-What is your policy regarding redaction or removal of personally-identifying information and other sensitive customer information submitted as part of business filings? -What about as part of UCC filings? -Are there differences between how you handle information you believe was submitted intentionally and information that a customer informs you was submitted accidentally?
<b>Manitoba</b>	
<b>Corporations Canada</b>	
<b>Alabama</b>	
<b>Alaska</b>	
<b>Arizona</b>	
<b>Arkansas</b>	
<b>California</b>	
<b>Colorado</b>	
<b>Connecticut</b>	
<b>Delaware</b>	
<b>District of Columbia</b>	
<b>Florida</b>	
<b>Georgia</b>	
<b>Hawaii</b>	
<b>Idaho</b>	
<b>Illinois</b>	

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<b>Indiana</b>	<p>-What is your policy regarding redaction or removal of personally-identifying information and other sensitive customer information submitted as part of business filings? Any PII (SSNs &amp; EINs) discovered by our Staff in business or trademark filings is manually redacted. We currently do not have any automated mechanisms in place that scan or redact PII in business filings. If a customer reports that PII is available in our publically available filing images, we will redact the PII and replace the image with the redacted version.</p> <p>-What about as part of UCC filings? For new UCC filings only, our internal (paper-submissions) and online systems actively search filings and attached images for PII (SSNs and EINs). For filings submitted by paper and for any online submission that contain an attachment with PII, the system automatically redacts the PII. In the collateral field of an online filing, we scan for PII and will redact only if the customer indicates that the data is PII. We have not gone live with XML filings yet, but we will also scan XML submissions and attachments for PII. If PII is found in XML submissions we will automatically redact.</p> <p>-Are there differences between how you handle information you believe was submitted intentionally and information that a customer informs you was submitted accidentally? No - our goal is to prevent PII from becoming part of the record and redact in either scenario.</p>
<b>Iowa</b>	
<b>Kansas</b>	
<b>Kentucky</b>	

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<b>Louisiana</b>	<p>*In reference to personal/sensitive information*: For Business Filings: if the filing is paper we will redact personal information (SSN, DL, etc...) before scanning into our system for filing.</p> <p>In regards to UCC filings: Since all UCC filings are filed at the Parish Clerk of Court office, it is up to each individual office to have policies in place for personal or sensitive information. Our office sends out Acknowledgement letters and Central Registry. For both of these, only the last 4 numbers of a social security number will show.</p> <p>*As to information that may have been submitted intentionally or accidentally*: For Business Filings--Usually if someone submits something accidentally, they are informing us "same day", so we do try to oblige and back the filing out, as long as no certified copies have been ordered. Once it is a matter of record, it would require a certificate of correction or another filing to correct.</p> <p>In regards to UCC filings: Again, all filings are processed at the Parish Clerk of Court. The clerks do not review UCC filings for accuracy or correctness (as far as the information provided other than what is necessary by statute). If a customer informs the filing office that a UCC filing was submitted accidentally, such as a termination filed on the wrong UCC. The customer is informed that a UCC-5 Information Statement can be filed stating the UCC was filed by accident.</p>
<b>Maine</b>	
<b>Maryland</b>	
<b>Massachusetts</b>	<p>This office generally rejects business filings containing private and personal information.                      As for UCC filings, we will redact private and personal information. Our UCC system also has a redaction service with our senior UCC examiners use to ensure that the information is redacted.</p> <p>If personal information is later found to be on the filing, we will redact that personal information from the filing.</p>

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<b>Michigan</b>	<p>Michigan is the same as Indiana for the first and third questions. UCC filings are handled by a different department in Michigan. I have copied IACA's STS Chair, Rayne Sherman, on this message, as she is with that department.</p> <p>For UCC, Michigan only redacts the first 5 digits of an SSN.</p> <p>Our software does not do any type of OCR, however, it does scan the collateral entered online for certain key words or number configurations and any filings found to contain those items are listed on a report for staff to manually review. Our online portal does not allow attachments to be uploaded. We do have a warning on the collateral screen that SSN and other personally identifying information should not be entered.</p> <p>When filings are mailed to us, we don't index the collateral and the system does not perform the check of the collateral against the key word list. If we see PII on an attachment, we will reach out to the filer and ask them if they are sure they want to include that information in a public database. We do not alter the attachment, however, we will allow the filer to provide an alternate version that does not contain the PII. We have also realized through doing this that some filers are not aware of exactly what happens when they send us the filings, so it provides us with an educational opportunity.</p>
<b>Minnesota</b>	<p>Minnesota Statutes 13.355 subd. 1 states the Social Security numbers of individuals, whether provided in whole or in part, collected or maintained by a government entity, are private data on individuals, except to the extent that access to the Social Security number is specifically authorized by law. Therefore, our current implementation practice queries 9 consecutive numbers regardless of what follows or precedes (space, character, letter, another number). A manual review is done for filings submitted by paper. System has logic to examine data and search for patterns that could potentially be private data for all electronically submitted filings either online or XML. If match is found, the filing is forwarded to a queue for manual review. Any 9 consecutive number will be reviewed for quantifying criteria and redacted according the unique pattern.</p>
<b>Mississippi</b>	
<b>Missouri</b>	
<b>Montana</b>	
<b>Nebraska</b>	
<b>Nevada</b>	<p>This is the same process Nevada uses.</p>
<b>New Hampshire</b>	
<b>New Jersey</b>	

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<b>New Mexico</b>	
<b>New York</b>	
<b>North Carolina</b>	
<b>North Dakota</b>	
<b>Ohio</b>	<p>In Ohio we have a law which states we must redact or reject any filing that contains SSN or EIN.  <a href="https://nam12.safelinks.protection.outlook.com/?url=http%3A%2F%2Fcodes.ohio.gov%2Foc%2F111.241v1&amp;data=02%7C01%7Cpviverto%40azsos.gov%7C3896080693a047f8fc9b08d7b7124699%7Cb4494a03f26d475dba4139871e763531%7C1%7C0%7C637179161435210345&amp;data=DA9HVPy0P%2BOXq6rzoHjpDEVAeXLsqPzWA9eHST%2BxFD1%3D&amp;reserved=0">https://nam12.safelinks.protection.outlook.com/?url=http%3A%2F%2Fcodes.ohio.gov%2Foc%2F111.241v1&amp;data=02%7C01%7Cpviverto%40azsos.gov%7C3896080693a047f8fc9b08d7b7124699%7Cb4494a03f26d475dba4139871e763531%7C1%7C0%7C637179161435210345&amp;data=DA9HVPy0P%2BOXq6rzoHjpDEVAeXLsqPzWA9eHST%2BxFD1%3D&amp;reserved=0</a></p> <p>We have technology in our UCC system to check for any 9 digit number and as we have all seen there are times a 9 digit number must be included in a collateral description as it could be a necessary account number - so the system will ask if the number is a SSN/EIN and if the customer states yes, then the system will redact it, but if not, then we permit them to proceed. With our business filings, it is more of a manual process where we look for these numbers and redact them or reject. In the past we saw these numbers appear frequently on UCCs, but not as often on business filings.</p>
<b>Oklahoma</b>	
<b>Oregon</b>	
<b>Pennsylvania</b>	
<b>Rhode Island</b>	
<b>South Carolina</b>	
<b>South Dakota</b>	
<b>Tennessee</b>	

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<b>Texas</b>	<p>Social security numbers, credit card and bank account numbers, access device numbers, and certain other types of information are confidential under the Public Information Act, Chapter 552 of the Texas Government Code. The secretary of state is prohibited by law from releasing this information. We will redact this information from documents filed in our office and made available to the public. An un-redacted copy of the document will be retained for access by the secretary of state staff in response to requests from law enforcement or other authorized requestors.</p> <p>We use an internal program for online filings and a 3rd party program(Mentis interface) for paper filings. We have the same issue as Ohio with business filings where it is a more manual process.</p>
<b>Utah</b>	
<b>Vermont</b>	
<b>Virginia</b>	
<b>Washington</b>	
<b>West Virginia</b>	
<b>Wisconsin</b>	
<b>Wyoming</b>	

**Additional comments:**

**Full text of email:**

Hello all! Here are some questions from Iowa regarding UCCs:

- What is your policy regarding redaction or removal of personally-identifying information and other sensitive customer information submitted as part of business filings?
- What about as part of UCC filings?

-Are there differences between how you handle information you believe was submitted intentionally and information that a customer informs you was submitted accidentally?

Kyle Phillips  
Information Technology Director

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