



**STATE OF NEW YORK
INSURANCE DEPARTMENT**
25 BEAVER STREET
NEW YORK, NEW YORK 10004

**Circular Letter No. 7 (2000)
February 3, 2000**

TO: All licensed life insurers, property/casualty insurers, co-operative property/casualty insurers, financial guaranty insurers, mortgage guaranty insurers, reciprocal insurers, title insurers, accident and health insurers, Article 43 corporations, all Public Health Law Article 44 health maintenance organizations, and the New York Property Insurance Underwriting Association; all hereinafter referred to as "licensees"

RE: Privacy Safeguards - Protection of Nonpublic Personal Information

Under Sections 501(b) and 505(b)(2) of the Gramm-Leach-Bliley Act (S.900), State insurance regulators must establish appropriate standards for insurance providers subject to their functional regulation relating to privacy of customer records and information, such standards to include administrative, technical, and physical safeguards. In order to prepare for the development of such standards, the Insurance Department, pursuant to Section 308 of the Insurance Law, hereby requires each licensee to inform the Department of the policies or safeguards, if any, that it currently has in place to:

- (a) insure the security and confidentiality of customer records and information containing nonpublic personal information;
- (b) protect against any anticipated threats or hazards to the security or integrity of such records and information; and
- (c) protect against unauthorized access to or use of such records or information which could result in substantial harm or inconvenience to any customer.

In addition to the foregoing, each licensee is directed to provide information on any agreement it has with any third party regarding the sharing of access to customer records and information.

Licensees are directed to provide the above information, no later than February 29, 2000, as follows:

All licensed life insurers are to direct their responses and any questions relating to this Circular Letter to:

Joanne Girard
Senior Insurance Examiner
New York State Insurance Department
25 Beaver Street
New York, New York 10004
Telephone: 212.480.4776
E-mail address: jgirard@ins.state.ny.us

All licensed property/casualty insurers, co-operative property/casualty insurers, financial guaranty insurers, mortgage guaranty insurers, reciprocal insurers, title insurers, and the New York Property Insurance Underwriting Association are to direct their responses and any questions relating to this Circular Letter to:

Vincent Mazzarella
Senior Insurance Examiner
New York State Insurance Department

25 Beaver Street
New York, New York 10004
Telephone: 212.480.5590
E-mail address: vmazzare@ins.state.ny.us

All licensed accident and health insurers, Article 43 corporations, and all Public Health Law Article 44 health maintenance organizations are to direct their responses and any questions relating to this Circular Letter to:

Mary Lee Kreuter
Assistant Chief Examiner
New York State Insurance Department
25 Beaver Street
New York, New York 10004
Telephone: 212.480.5240
E-mail address: mkreuter@ins.state.ny.us

The licensee's reply must be in writing, subscribed by the president or chief executive officer of such licensee, and affirmed as true under the penalties of perjury, in accordance with Section 308 of the Insurance Law.

Very truly yours,

Kevin M. Rampe
Deputy Superintendent and
General Counsel