

# ILLINOIS COMMERCE COMMISSION

REPORT TO THE ILLINOIS GENERAL ASSEMBLY  
CONCERNING E-DOCKET PRIVACY NOTIFICATION



OCTOBER 1, 2024



STATE OF ILLINOIS

## ILLINOIS COMMERCE COMMISSION

527 East Capitol Avenue  
Springfield, Illinois 62701

160 North LaSalle  
Chicago, Illinois 60601

October 1, 2024

The Honorable Members of the Illinois General Assembly  
State Capitol  
Springfield, Illinois

Dear Members of the General Assembly:

Enclosed is the Illinois Commerce Commission's (ICC) Annual Report to the Illinois General Assembly concerning the disclosure of personally identifiable information in the ICC's E-Docket Privacy Notification.

This report is submitted in compliance with the Identity Protection Act (5 ILCS 179/1 et seq.) and the Personal Information Act (815 ILCS 530/1 et seq.). During the past year, the ICC identified and removed documents containing personal information that is detailed in the corresponding report.

Sincerely,

A handwritten signature in black ink that reads "Douglas P. Scott".

Douglas P. Scott  
Acting Chairman

## **EXECUTIVE SUMMARY**

The Illinois Commerce Commission (“ICC”) is submitting this report in compliance with the Personal Information Protection Act (815 ILCS 530/1 et seq.). In 2024, the ICC identified and removed documents that were submitted to the e-Docket system containing personal information.

The e-Docket system (<http://www.icc.illinois.gov/e-docket>) is the ICC’s web based electronic filing system that allows electronic filing, management, and access to electronic records in official ICC cases. As a matter of procedure, the ICC posts documents submitted in official ICC cases on the e-Docket system.

Unless designated as confidential, documents filed in official cases are posted on the e-Docket system exactly as they are submitted to the ICC. These documents may contain personal information including a person’s Social Security number, driver’s license number, and account number or credit or debit card number.

In 2024, ICC staff was notified that personal information was discovered in documents on the e-Docket system. Upon completing an exhaustive search to identify personal information on the e-Docket system, ICC staff removed all personal information in question, and it is no longer available on the system.

Moving forward, the ICC will continue to implement and modify internal controls to protect privacy information. Efforts to correct the vulnerabilities detected in this report are underway to remain in compliance with the Identity Protection Act (5 ILCS 179/1 et seq.) and the Personal Information Protection Act (815 ILCS 530/1 et seq.).

**ICC PERSONAL INFORMATION DATA BREACH REPORT  
2023-2024**

The ICC takes the safeguarding of personal information very seriously by implementing internal controls to protect privacy information and minimize the possibility of future exposure of such personal information. In accordance with the Personal Information Protection Act (815 ILCS 530/1 et seq.), the ICC has adopted several measures to protect public records from unauthorized disclosure.

**Details of Corrective Action for Current Data Disclosure**

In 2024, ICC staff was notified by an external party that personal information was identified within the e-Docket system. Staff subsequently performed an internal search to locate and remove files containing the reported information in e-Docket.

An extensive search was completed whereby personal information was found for a total of six (6) individuals within the e-Docket system. ICC staff provided notification to everyone identified and removed any public access to that information permanently from e-Docket.

The data that was disclosed within e-Docket prior to being removed included:

<b>Data Type</b>	<b># Notification Letters Sent to Individuals</b>
Social Security Number	5
Bank Account Number	0
Driver's License Number	1
Credit Card Number	0
Debit Card Number	0
<b>Total</b>	<b>6</b>

**Overview of ICC Preventative Practices**

The ICC implements several proactive measures to protect personal information in e-Docket filings. Since 2013, there have been zero (0) instances of unauthorized disclosure of personal information. The ICC's current data protection procedures for e-Docket include:

1. Disabling website full text searching of the following privacy terms: social security number, driver's license number, and account number or credit or debit card number.
2. Communicated Privacy Responsibilities and expectations to both ICC staff and e-Docket filers including:

- Providing notice to external users of the e-Docket system through mass mailing. This notice is included in each informational packet sent to new users of the e-Docket system.
  - Posting prominent privacy warnings on the e-Docket website and upload screen stating that the filer is verifying the uploaded file does not contain privacy information.
3. Incorporated Proactive Measures to Identify Privacy Information during the Acceptance of an e-Docket filing:
- Integrated an electronic privacy search tool into the e-Docket acceptance process to help detect privacy information prior to docket acceptance. The ICC Chief Clerk's Office now performs visual reviews of new consumer complaint filings for privacy information.
4. Pending Measures:
- Because of the recent unauthorized disclosure, the ICC will be reviewing current policies and exploring updated software options to assist in the detection of personal information.

## **Conclusion**

The current disclosures of personal information have been corrected and parties effected have been properly notified. A review of current policies is underway to improve protection of personal information in the e-Docket system. The ICC will continue to protect privacy information from accidental or unauthorized disclosure and adhere to the requirements of the Identity Protection Act and the Personal Information Protection Act.