



# **Idaho DMV Control Records**

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# Background

- **Idaho Code 49-202**: All registration and driver's license records ... shall be public records and open to inspection by the public ... except for those records declared by law to be for the confidential use of the department, or those records containing personal information...
- The department may enter into agreements with private companies or public entities to provide the services for which a fee is collected in subsection (2)(g) of this section)



# Concern

- Privacy Complaints – unsolicited contact
- Primarily third-party “Extended Auto Warranty” or “Vehicle Service Contracts”
- Information appeared to originate at DMV?
- Local news questions



# Solution Team

- Economics and Research
- Deputy Attorney General
- Deputy Director
- DMV Administrator
- Select DMV staff



# Safeguard Process - 1

- Decided on “canary trap” method - we “seed” different data deliveries with unique control records
- DMV Staff tracks records and deliveries
- Use an actual VIN and vehicle description
- “Actual” people with controlled addresses



# Safeguard Process - 2

- Work with a local auto dealer to obtain a record of an existing vehicle for the file
- A registration and/or title record with the VIN, vehicle description and owner information is issued (including plates).
- DMV staff member works with IT to append the record onto the output file going to the selected contract vendor



# Safeguard Process - 3

- The record does not become a lasting transaction in the databases – deleted as soon as delivered
- Not sent to NMVTIS or CARFAX
- ATVS / UTVS are not included yet



# Contract Change

- Added language to contract:
- “The Purchaser understand that the Department may exercise its reserved right to insert control records into bulk records and information furnished, as an independent means of identifying any entities to whom the Purchaser may have improperly resold or re-disclosed records and information under this agreement or if any inappropriate use has occurred. ”





# Impact

- Monthly team meeting to go over new contracts and address issues
- We identified three entities that violated the contract based on results from the file seeding
- Canceled contracts but no options further punishment (fine, etc.)



# For More Information Contact:

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