

### **Privacy Policy**

Policy Number: IT-011 Effective Date: March 05, 2015

The purpose of this statement is to define the City of Los Angeles' policy with regards to the collection and use of personally identifiable information (PII - any information relating to an identified or identifiable individual who is the subject of the information).

### **Information Collected**

The City of Los Angeles collects two kinds of user information – Anonymous Information and Personally Identifiable Information (PII).

Anonymous information is information that does not identify specific individuals and is automatically transmitted by your browser. This information can consist of:

- The URL (Uniform Resource Locator or address) of the web page you previously visited
- The domain names and/or IP addresses which are numbers that are automatically assigned to your computer whenever you are connected to the Internet or World Wide Web
- The browser version you are using to access the site

This information is used to help improve our web site. None of the information can be linked to any individual.

Personally Identifiable Information (PII) is information that could include:

- Name
- Address
- Email address
- Telephone number
- Credit/debit card information

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The City will make every reasonable effort to protect your privacy. It restricts access to your personal identifiable information to those employees that will respond to your request. The City does not intentionally disclose any personal information about our users to any third parties inside or outside the City except as required by law.

The City only collects personally identifiable information that is required to provide service. You can decline to provide us with any personal information on any site on the Internet at any time. However, if you should choose to withhold requested information, we may not be able to provide you with the online services dependent upon the collection of that information.

### **Access to Personally Identifiable Information**

Access to personally identifiable information in public records at state and local levels of government in Los Angeles is controlled primarily by the California Public Records Act (Government Code Section 6250, et seq.). Information that is generally available under the Public Records Act may be posted for electronic access through the City's web site. While the Public Records Act sets the general policies for access to City records, other sections of California code as well as federal laws also deal with confidentiality issues.

#### E-mail Addresses

E-mail addresses obtained through the web site will not be sold or given to other private companies for marketing purposes. The information collected is subject to the access and confidentiality provisions of the Public Records Act, other applicable sections of the California code as well as federal laws. E-mail or other information requests sent to the City web site may be maintained in order to respond to the request, forward that request to the appropriate agency within the City, communicate updates to the City page that may be of interest to citizens, or to provide the City web designer with valuable customer feedback to assist in improving the site. Individuals can cancel any communications regarding new service updates at any time.

#### Cookies

Some City applications use "cookies." A cookie is a small data file that certain web sites write to your hard drive when you visit them. A cookie file can contain information such as a user id that the site uses to track the pages you have visited. But the only personal information a cookie can contain is information you supply yourself. A cookie is only a text file and cannot read data off your hard disk or read cookie files created by other sites. Cookies can track user traffic

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patterns, recognize your computer's browser when you return, and could provide personalized content without requiring sign-in.

You can refuse cookies by turning them off in your browser. However, they may be required to use some of the web applications on the City's site.

### **Google Analytics Cookie Tracking**

Some City applications use Google Analytics cookies to log user sessions and help us understand traffic and behavior. This helps us analyze data about web page traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes.

Some City applications include the Google Analytics Display Advertising feature used to provide Demographics and Interest Reporting. This feature uses a third party DoubleClick Cookie.

To provide website visitors the ability to prevent their data from being used by Google Analytics, Google has developed the Google Analytics opt-out browser add-on for the Google Analytics JavaScript (ga.js, analytics.js, dc.js). This add-on instructs the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) running on websites to prohibit sending information to Google Analytics. However, the Google Analytics opt-out browser add-on does not prevent data from being sent to the City's site.

Visit https://tools.google.com/dlpage/gaoptout/ for more info on how to opt out.

Please note that updates to your browser or operating system may affect the functionality of the opt-out add-on. The latest versions of Internet Explorer sometimes load the Google Analytics opt-out add-on after sending data to Google Analytics. Therefore, if you are using Internet Explorer, the add-on will set cookies on your computer. These cookies ensure that any collected data is immediately deleted from the collection server. Please make sure that third party cookies aren't disabled for your Internet Explorer browser. If you delete your cookies, the add-on will, within a short timeframe, reset these cookies to ensure that your Google Analytics browser add-on remains fully functional. The following chart is a detailed list of Google Analytics cookies that would be used.

| Cookie<br>Name | Default<br>Expiration<br>Time | Description                    |
|----------------|-------------------------------|--------------------------------|
| _ga            | 2 years                       | Used to distinguish users.     |
| _gat           | 10 minutes                    | Used to throttle request rate. |

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| utma        | 2 years from set/update        | Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existingutma cookies exists. The cookie is updated every time data is sent to Google Analytics.   |
|-------------|--------------------------------|---|
| utmt        | 10 minutes                     | Used to throttle request rate.  |
| utmb        | 30 mins<br>from<br>set/update  | Used to determine new sessions/visits. The cookie is created when the javascript library executes and no existingutmb cookies exists. The cookie is updated every time data is sent to Google Analytics.  |
| utmc        | End of<br>browser<br>session   | Not used in ga.js. Set for interoperability with urchin.js. Historically, this cookie operated in conjunction with theutmb cookie to determine whether the user was in a new session/visit.   |
| utmz        | 6 months<br>from<br>set/update | Stores the traffic source or campaign that explains how the user reached your site. The cookie is created when the javascript library executes and is updated every time data is sent to Google Analytics.  |
| utmv        | 2 years from set/update        | Used to store visitor-level custom variable data. This cookie is created when a developer uses the _setCustomVar method with a visitor level custom variable. This cookie was also used for the deprecated _setVar method. The cookie is updated every time data is sent to Google Analytics. |
| Doubleclick |                                | Google Analytics Demographics and Interest Reporting  |

### **Minor's Privacy Policy**

Any information collected by any City site from children under 13 are subject to the same guidelines as the general City privacy policy. In addition, the following guidelines will be followed for any information collected by or for any child under 13:

 Information that could be collected from or for a minor includes but might not be limited to name, address, telephone number, e-mail address, school, and hobbies.

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- Parental (including legal guardian) Consent
- Parental consent will be obtained before collecting, using or disclosing personal information about a child.
- If any information practices change in a "material" way, new consent will be obtained from the parents. This includes changes in the kinds of material being collected, a change in how that information is being used, or if there is a change in the third parties that have access to that information.
- Parents will be able to review the personal information collected from their children which includes verification of the identity of the requesting parent.
   See individual requests for information for specifics.
- Parents will be allowed to revoke their consent and delete information collected from or for their children on request. When consent is revoked, the website will stop collecting, using or disclosing information from or for that child. Revocation may end a child's participation in an activity if the information collected was necessary for participation on the website.
- Additional information can be obtained at the FTC's Consumer Response Center (http://www.ftc.gov/privacy/index.html) and the Kidz Privacy (http://www.ftc.gov/bcp/conline/edcams/kidzprivacy/index.html) websites.

### Security

The City of Los Angeles is committed to data security and the data quality of personally identifiable information that is either available from or collected by our web site and has taken reasonable precautions to protect such information from loss, misuse or alteration.

The City operates "secure data networks" protected by industry standard firewalls and password protection systems. Only authorized individuals have access to the information provided by our users.

When a City application accepts credit cards or any other particularly sensitive information for any of its services, it encrypts all ordering information, such as your name and credit card number, in order to protect its confidentiality.

### Access to Your Information

Unless otherwise prohibited by state or federal law, rule or regulation you will be granted the ability to access and correct any personally identifiable information.

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We will take reasonable steps to verify your identity before granting access to review or make corrections to your information. Each City service that collects personally identifiable information will allow for review and update of that information. See individual requests for information for specifics.

### **Non City Web Sites**

Non-city web sites may be linked through the City's web site. Many non-city sites may or may not be subject to the Public Records Act and may or may not be subject to other sections of California Code or federal law. Visitors to such sites are advised to check the privacy statements of such sites and to be cautious about providing personally identifiable information without a clear understanding of how the information will be used. Visitors may also wish to consult privacy guidelines such as those recommended by the Online Privacy Alliance (http://www.privacyalliance.org/resources/ppguidelines.shtml).

### **How to Contact Us**

If you have any questions or concerns about this privacy policy, please send us an email at ita.webservices@lacity.org.

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