

## University of California, Santa Barbara Advisory on Privacy Notification Statement

### Collection of Personal\* Information

To comply with the California Information Practices Act (IPA) and University of California policy, University of California, Santa Barbara (UCSB) Web sites that collect personal\* information must contain a formal privacy notice that includes:

1. **Name** of the University office that is requesting the information;
2. **Title, university address and telephone number** of the official who is responsible for the maintenance of the information;
3. Citation of the university policy or other **legal authority** which authorizes the maintenance of the information (The Regents of the University of California);
4. Whether submission of the information is **mandatory or voluntary**;
5. **Consequences**, if any, of not providing all or any part of the requested information;
6. **Principal purpose(s)** for which the information is to be used; and
7. Provision for the individual to **access** the information s/he provided to the university.

Confidential/restricted information collected on Web sites is to be protected by security measures that conform to University of California security policy and practices, including [Business and Finance Bulletin IS-3](#).

### Collection of General Information

Although the Online Privacy Protection Act doesn't apply to the University of California, adopting some or all of its provisions is recommended as a service to those who visit our Web sites. Therefore, UCSB Web masters and administrators whose Web sites collect general information from visitors, are encouraged to publish a privacy notification statement that informs individuals of the data collection and storage practices for their site(s). The following elements are recommended to be included in a general privacy notification statement:

1. **General statement** about information access and privacy, and how the visitor to the Web site will be notified of changes to the privacy statement;
2. **Information Collected** – what kind of information is being collected;
3. **Use of Information Collected** – what is the intended use (purpose) of the information being collected;
4. **Disposition of Collected Information** -- what information will be shared and with whom; how long will information be saved and by whom;
5. **Accessing and Updating Information** – what is the process for individuals who have provided information to access and correct it, if necessary;
6. **Security Practices** – what general security measures are used to protect the collected information;
7. **Third Party Links** – provide a disclaimer regarding links to third party sites (unless your Web site includes a Terms of Use statement that includes a third party link disclaimer);
8. **Choice** – how does one opt out of having information collected; is there an alternate means to obtain the service(s) without providing the requested information;
9. **Department Contact** – provide complete title, telephone number and physical address so that individuals may obtain answers to questions about information collection and security. A FAX number or email address may also be provided.

### Collection of Information from Children

If the site collects information from children (an individual under the age of 18), it is recommended that you include, in the privacy notification statement, the provisions specified in the [Children's Online Privacy Protection Act of 1998](#).

### **Limitations on Collection and Retention**

In all cases, UCSB Web sites are to collect only that information which is relevant and necessary to accomplish a purpose of the University. The information should be retained in accordance with [UC records retention schedules](#), as applicable, and carefully disposed of when the information has fulfilled its purpose.

### **Placement of Privacy Notification Statement**

The footer of the Web site's home page is the recommended placement for a link to a general privacy notification statement; it need not be displayed on every Web page. However, if personally identifiable information will be collected, a statement (or link) should be prominently displayed on the page on which the information is requested and should be accessible to the individual to read prior to volunteering information about him/herself. The icon or link should contain the word "privacy."

A privacy notification statement can be added to a site in several ways:

1. Link directly to the [UCSB privacy notification statement](#) (satisfies both laws and UC policy)
2. Add the source document to your Web page with PHP, Perl, ASP, and .NET
3. Customize a privacy notification statement that includes the requisite information, as noted above

### **Definitions**

**\*Personal Information** means, as used in this statement/advisory, information that personally identifies or describes an individual, including: an individual's first name or first initial and last name, in combination with any one or more of the following: 1) Social Security number, 2) driver's license number or California identification card number, 3) financial account number or credit or debit card number in combination with any required security code, access code, or password that would permit access to an individual's financial account, 4) medical information, and 5) health insurance information. Source: [UC Santa Barbara SB 1386 and AB 1298 Guidelines](#)

The following information, when affiliated with a specific individual's name, is also considered personal information: 1) birth date, 2) citizenship, 3) biometrics, 4) home address, 5) home telephone number, 6) partner's or relatives' names, 7) income tax withholding, 8) staff performance evaluations or letters of corrective actions. Source: [University of California Business and Finance Bulletin RMP-8](#)

### **Additional Resources**

[Collection and Use of Social Security Number](#)

[Privacy and Access to Information](#)

[Privacy and Security](#)

[University of California Sample Privacy Statement When Personal Information is Collected](#)