

# Privacy Policy

This policy describes how the Santa Barbara County Association of Governments (SBCAG) will handle an individual's private information.

The policy aims to provide clear information for users and/or customers, to provide clear direction to SBCAG employees, and to keep SBCAG compliant with all applicable local, state, and federal data privacy laws.

This policy includes both a section specifically around website policies and more general information about maintaining appropriate controls around privacy that apply to both the website and any applications we may build.

## Website Privacy

At SBCAG we work hard not to collect information we don't explicitly need and avoid integrating tools that collect data in unsolicited ways.

During the course of online interactions with our website (Site), it is customary to collect information that your web browser provides including:

- IP Address
- Web Browser
- TimeZone / Locale

Additionally, as you browse the Site, we collect information about the individual web pages that you view, what websites or search terms referred you to the Site, and information about how you interact with the Site.

We collect Device Information using the following technologies:

- "Cookies" are data files that are placed on your device or computer and often include an anonymous unique identifier. For more information about cookies, and how to disable cookies, visit [allaboutcookies.org](http://allaboutcookies.org).
- "Log files" track actions occurring on the Site, and collect data including your IP address, browser type, internet service provider, referring/exit pages, and date/time stamps.
- "Web beacons," "tags," and "pixels" are electronic files used to record information about how you browse the Site.

Additionally, when you purchase Services or attempt to purchase Services through the Site, we collect certain personally identifiable information from you, including your name, billing address, shipping address, payment information (including credit card numbers), email address, and phone number. We refer to this information as "Order Information."

When we talk about "Personal Information" in this Privacy Policy, we are talking both about Device Information and Order Information.

## Sharing and Transferring Your Personal Information

In no case do we sell or rent Personal Information to marketers or unaffiliated third parties. We share your Personal Information with trusted entities, as outlined below.

We share Personal Information internally to provide our Services and for internal administration purposes.

We share Personal Information with a limited number of our service providers. We have service providers that provide services on our behalf, such as website hosting, data analysis, information technology and related infrastructure, customer service, email delivery, and auditing services. These service providers may need to access Personal Information to perform their services. We authorize such service providers to use or disclose the Personal Information only as necessary to perform services on our behalf or comply with legal requirements. We require such service providers to contractually commit to protect the security and confidentiality of Personal Information they process on our behalf. Our service providers are predominantly located in the United States of America.

We share your Personal Information with third parties to help us use your Personal Information, as described above. For example, we may use Google Analytics to help us understand how our customers use the Site—you can read more about how Google uses your Personal Information [here](#). You can also opt-out of Google Analytics [here](#).

Finally, we may also share your Personal Information to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful request for Personal Information we receive, or to otherwise protect our rights.

## Do Not Track

Please note that we do not alter our Site's data collection and use practices when we see a Do Not Track signal from your browser.

## Use By Minors

The Site is not intended for use by individuals under the age of thirteen (13), and we request that they not provide Personal Information through the Site.

## Your Rights

You have choices regarding our use and disclosure of your Personal Information:

1. Opting out of receiving electronic communications from us. If you no longer want to receive marketing-related emails from us, you may opt-out via the unsubscribe link included in such emails. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages that are required to provide you with our Services.
2. How you can see or change your account Personal Information. If You would like to review, correct, or update Personal Information that You have previously disclosed to us, You may do so by signing in to your account or by contacting us.
3. Your data protection rights. Depending on your location and subject to applicable law, you may have the following rights with regard to the Personal Information we control about you:

- A. The right to request confirmation of whether SBCAG processes Personal Information relating to you, and if so, to request a copy of that Personal Information;
  - B. The right to request that SBCAG rectifies or updates your Personal Information that is inaccurate, incomplete or outdated; The right to request that SBCAG erase your Personal Information in certain circumstances provided by law;
  - C. The right to request that SBCAG restrict the use of your Personal Information in certain circumstances, such as while SBCAG considers another request that you have submitted (including a request that SBCAG make an update to your Personal Information);
  - D. The right to request that we export to another company, where technically feasible, your Personal Information that we hold in order to provide Services to you. Where the processing of your Personal Information is based on your previously given consent, you have the right to withdraw your consent at any time. You may also have the right to object to the processing of your Personal Information on grounds relating to your particular situation.
4. Process for exercising data protection rights. In order to exercise your data protection rights, you may contact SBCAG as described in the Contact Us section below. We take each request seriously. We will comply with your request to the extent required by applicable law. We will not be able to respond to a request if we no longer hold your Personal Information. If you feel that you have not received a satisfactory response from us, you may consult with the data protection authority in your country.

For your protection, we may need to verify your identity before responding to your request, such as verifying that the email address from which you send the request matches your email address that we have on file. If we no longer need to process Personal Information about you in order to provide our Services or our Sites, we will not maintain, acquire or process additional information in order to identify you for the purpose of responding to your request.

## Handling Private Data

Private data including PII (personally identifiable information; for example, name and email) at a minimum, is encrypted at rest and in transit. It must also have appropriate authorization and auditing so that we are sure that the people accessing the data have the right to do so and that any access is trackable.

## Publishing The Privacy Policy

We may update this privacy policy from time to time in order to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons. The "Update Date" at the bottom of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes are effective when we post the revised Privacy Policy on the Site. We may provide you with disclosures and alerts regarding the Privacy Policy or Personal Information collected by posting them on our website and, if you are a User, by contacting you through our application or an associated user email address.

## Audience

All Santa Barbara County Association of Government (SBCAG) employees need to be aware of the policy.

Any external user must have access to view the Website section of the policy.

## Policy Tracking

<b>Tracking Item</b>	<b>Detail</b>
Policy Name	Privacy Policy
Policy Owner	Santa Barbara County Association of Governments (SBCAG)
Policy Approver	June 17, 2021
Approval Date	June 17, 2021
Update Date	
Audience	

## Version History

<b>Version</b>	<b>Date</b>	<b>Approvers</b>	<b>Changes</b>
1.0	June 17, 2021	SBCAG Board of Directors	Initial Version