# **ETP's Privacy Policy**

The Employment Training Panel (ETP) recognizes that privacy is a fundamental right, without exception. Any Personally Identifiable Information (PII) that is collected or maintained by ETP will be administered in strict compliance with the Information Practices Act of 1977 (California Civil Code section 1798, et seq.) and the Federal Privacy Act (Public Law 93-579; 5 U.S.C. sections 552a, et seq.). ETP also follows State of California requirements for the electronic collection of information (California Government Code section 11015.5).

ETP's Privacy Policy reflects current business practices and is subject to change without notice. ETP reserves the right to make the revised notice effective for PII already collected or maintained, as well as information received in the future.

#### **Personally Identifiable Information Collection**

ETP collects PII relevant to specific purposes that are enumerated at or prior to the time of collection, in a privacy notice included on or with the form used to collect said PII (California Government Code section 11019.9(b)(2)). Any subsequent use of PII is limited to the fulfillment of purposes consistent with the specified purpose.

ETP collects PII only as needed, which includes, but is not limited to:

- Trainee Name
- Trainee Social Security Number
- Demographic Information (e.g., age range, ethnicity and education)
- Combination of Information (e.g., birthdate, zip code and gender)

ETP collects PII through the website only when individuals provide such information voluntarily through online channels.

#### **Cookies and Session Identifiers**

Cookies are simple text files stored on your computer by your web browser. The main portal of the ETP website does not use cookies to maintain personalization. ETP only uses cookies during sessions where interactive applications are accessed.

Cookies created on your computer by using this website do not contain PII and do not compromise your privacy or security. Cookies are used to store a randomly generated identifying temporary tag on your computer to allow the website to operate correctly, know where to return business transaction results, and authenticate users for interactive, customer-centered applications. This provides better customer service and security to users and expedites requests for information or other interactions with website applications.

Cookies operate through a session identifier, which is a unique alphanumeric string randomly generated by the web server for each new visit. The session identifier contains no PII. When

you leave the website, close your browser or turn off your computer, the session identifier is destroyed and cannot be used again. It is flushed from your browser memory immediately and flushed from the ETP server after 20 minutes of user inactivity.

You can refuse the cookie or delete the cookie file from your computer by using any of the widely available methods. However, if you turn your cookie option off you may not be able to access some of the features in the interactive applications.

If you do nothing during your visit to the ETP website, but browse or download information, the website automatically collects and stores the following information about your visit:

- 1. The Internet Protocol (IP) address and domain name used
- 2. The type of browser and operating system used
- 3. The date and time the website was visited
- 4. The web pages or services accessed
- 5. The website visited prior to coming to the website
- 6. The website visited when leaving the website, and
- 7. Any forms or documents downloaded from the website.

This information is used to improve web services and to help ETP understand how people are using the services. This information does not identify you personally and is used for gathering website statistics. The information helps ETP analyze website usage to continually improve the value of the materials available.

ETP may review basic information about its website using Google Analytics®, a software program that conveys the visitor's network location (internet protocol (IP) address). ETP does not publish this information.

## **Security and Electronic Transmissions**

ETP uses information security safeguards to protect PII collected and maintained from loss, unauthorized access, and illegal use, modification, and disclosure. Security measures are integrated into the design, implementation, and operations of the entire ETP business environment. ETP protects the integrity of its communications and computing infrastructure by implementing a variety of security controls, such as secured storage areas, monitoring, audit trails, password protection, user verification, and data encryption.

Each electronic account maintained by ETP is protected by a user ID and password. All users are responsible for protecting the confidentiality of their user ID and password.

ETP personnel are trained on procedures for the management of PII, including limitations on the release of information. Access to PII is limited to personnel whose work requires such access and periodic reviews are performed to ensure that proper information management policies and procedures are understood and followed. ETP encourages all individuals to use appropriate safeguards to secure their personal computers and the information on those computers as well.

In general, electronic transmissions are inherently not secure. PII submitted to ETP via the website or by email is not encrypted or otherwise secured. Do not submit personally identifiable, confidential, or proprietary information by such means unless you are willing to accept this inherent risk.

### Public Records, Distribution, Storage, and Retention

ETP will not distribute or sell any electronically collected PII about users to any third party without the user's written consent, except as required by law. ETP only uses PII as statutorily required and on a need-to-know basis in order to provide information or services. ETP will not disclose, make available, or otherwise use PII for purposes other than those specified in this Policy, except with the consent of the subject of the data, or as authorized by law or regulation.

Notwithstanding the foregoing, some information regarding an individual's ETP-funded training may be disclosed to the public if it is specifically requested under the California Public Records Act (California Government Code sections 6250, et seq.). PII is generally exempt from disclosure, and the data subject has the right to have any of their electronically collected PII deleted by ETP without reuse or distribution. See the "Individual Rights" section of this Policy for more information.

ETP does not store PII any longer than is required for business operations, in conformity with State of California record retention standards. Once retention is no longer required, the information is purged, magnetically degaussed/erased, shredded, or removed by other means of confidential destruction.

## **Individual Rights**

Individuals who provide ETP with PII have the right to access and review their PII and contest its accuracy or completeness. Individuals may request corrections to any inaccuracies in their records.

In addition, individuals have the right to have their electronically collected PII deleted without reuse or distribution. To exercise these rights, contact the ETP Information Security Officer (ISO), identified at the end of this Policy.

## **Publication and Liability**

Information published or distributed via this website may be copied and used by the public, except for copyright-protected text, images, and symbols. ETP assumes no liability for the improper or incorrect use of information that is published or distributed via this website.

Additionally, if you link to another website from here, you become subject to the privacy policy and conditions of that website.

## A copy of ETP's Privacy Policy is available for download.

If you have questions or concerns regarding ETP's Privacy Policy or any comments or complaints related to privacy or PII access requests, please contact:

Information Security Officer (ISO) Employment Training Panel 1100 J Street, 4th floor Sacramento, CA 95814

Email: <a href="mailto:ETPISO@etp.ca.gov">ETPISO@etp.ca.gov</a>

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