



COASTAL CONSERVANCY INFORMATION PRIVACY POLICY

Employees of the Coastal Conservancy, in the performance of their duties, may have occasion to receive, use, maintain and/or transmit personal information about other employees and/or members of the public. This Information Privacy Policy establishes a permanent policy designed to ensure that such personal information is received, used and maintained in accordance with applicable laws, and to ensure that the privacy rights of individuals who are the subject of such information are adequately protected.

This policy applies to all personal information received, used and/or maintained by the Coastal Conservancy, regardless of its source. This includes but is not limited to job applications and other personnel records, and information obtained from individuals via websites, e-mail, or form applications that request personal information.

Principles for the Collection and Dissemination of Personal Information

The following principles shall apply to the collection, use, maintenance and dissemination of personal information:

1. "Personal information" is defined as information protected under the Information Practices Act of 1977 (Civil Code sections 1798 *et seq.*). Personal information is any written or electronic record that identifies or describes an individual, including but not limited to names, social security numbers, home addresses, home phone numbers, physical descriptions, marital status and dependent information, education, financial matters, and medical or employment history. It includes records of statements made by, or attributed to, the individual.
2. Personal information may only be obtained through lawful means, and Coastal Conservancy employees responsible for the collection, use, maintenance and/or dissemination of personal information shall comply with the provisions of the Information Practices Act.

3. The purposes for which the Coastal Conservancy may collect personnel information shall be specified at or prior to the time such information is collected, and the types of personal information requested must be relevant to the purposes for which it is being collected.
4. A Coastal Conservancy employee shall not request individuals to disclose personal information that is not relevant and necessary to the lawful State function for which the employee is responsible.
5. The use of personal information by Coastal Conservancy employees shall be limited to and consistent with the fulfillment of the purposes, as previously specified, for which it was collected.
6. Personal information collected and maintained by the Coastal Conservancy shall be provided upon request to the person who is the subject of the information.
7. Personal information shall not be disclosed, made available, or otherwise used for a purpose other than as specified at the time that it was collected, except with the consent of the subject of the information or as otherwise permitted by law.

Protection of the Privacy of Personal Information

Personal information shall be protected against loss, unauthorized access, use, modification or disclosure by the following means:

1. Coastal Conservancy employees responsible for the collection, use, maintenance and/or dissemination of records containing personal information shall take all necessary precautions to assure that proper administrative, technical and physical safeguards are established and followed in order to protect the confidentiality of such personal information and to assure that such records are not disclosed to unauthorized individuals or entities.
2. The Coastal Conservancy Chief of Administration is responsible for assuring adherence to this Information Privacy Policy. This person shall familiarize him/herself with the provisions of this Policy and with the Information Practices Act of 1977.

3. The Chief of Administration may establish and implement any procedures necessary to assure that this Information Privacy Policy is implemented.
4. The Chief of Administration shall identify the location of all personal information maintained within the offices of the Coastal Conservancy, and shall assure that any other Coastal Conservancy employee to whom is delegated any responsibility for the receipt, maintenance or dissemination of personal information is familiar with the definition of "personal information" and the other provisions of this Policy.
5. Prior to the release of any document or information by the Coastal Conservancy to any individual or entity, including documents requested pursuant to the Public Records Act (Government Code sections 6250 *et seq.*), the document shall be reviewed and any personal information contained therein shall be removed or redacted if the dissemination of the personal information would not be consistent with this Information Privacy Policy.

Responsibilities of All Coastal Conservancy Employees

In addition to any responsibilities assigned by the Chief of Administration to specific Coastal Conservancy employees in order to implement the provisions of this Information Privacy Policy, all employees shall conduct themselves as follows:

1. No Coastal Conservancy employee shall purposefully disclose personal information to unauthorized persons or entities, and shall not seek out or use personal information relating to others for their own interest or advantage. Improper disclosure or use of personal information in violation of this Information Privacy Policy shall be cause for disciplinary action.
2. Coastal Conservancy employees shall make every reasonable effort to see that inquiries and requests by individuals for their own personal records are responded to quickly and without requiring the individual to repeat unnecessarily his or her inquiry to others. Coastal Conservancy employees shall assist individuals who seek information pertaining to them that has been collected by the Coastal Conservancy, so as to facilitate locating and providing such personal records as may be requested.

Adopted March 19, 2001