

LIVINGSTON COUNTY

ONLINE PRIVACY POLICY

RESOLUTION #2006-07-239

LIVINGSTON COUNTY, MICHIGAN

APPROVED: 7.17.06

A. POLICY

1. **PURPOSE:** To ensure the data security and protection against unauthorized disclosure of personal, proprietary, and other non-public information gathered from users or provided online through Livingston County websites or by other online transmission methods.

The Online Privacy Policy will protect the security and integrity of information obtained by Livingston County through its websites. It will also ensure that data security standards and procedures are established and maintained to provide a secure online environment for constituents to transact information and service requests through County websites.

2. **POLICY STATEMENT:** Livingston County is dedicated to the online privacy of its constituents' personally identifiable and nonpublic information through its commitment to security and integrity of data stored by the County and information gathered or provided online through its website or other transmission methods.

3. **APPLICABILITY:** All elected officials, employees, independent contractors, volunteers, student interns, and others who handle website user information or have access to such information through County databases or other shared resources.

4. **DEFINITIONS:** Online – Two-way digital transmissions of data between the County website and users requesting or accessing County information over the Internet's network infrastructure.

Data Security – Reasonable measures taken to prevent loss, alteration, misuse, or unauthorized access to data stored, gathered, or provided online by the County through the adherence to currently accepted information technology industry standards.

5. **REFERENCE AND LEGAL AUTHORITY:**

County Boards of Commissioners, Public Act 156 of 1851, MCL § 46.11(m)

Freedom of Information Act, MCL § 15.231, et seq. (FOIA)

Health Insurance Portability and Accountability Act (HIPAA)

Social Security Privacy Act MCL § 445.81, et seq.

6. **SEE ALSO:**

Enhanced Access Policy

Social Security Number Privacy Policy

7. **SUPERSEDES:** None

8. **APPROVED BY:** Board of Commissioners: July 17, 2006

9. **RESOLUTION:** #2006-07-239

10. REVIEW HISTORY: None

B. WEBSITE USER PRIVACY POLICY GUIDELINES (TO BE POSTED ON WEBSITE)

1. **PERSONALLY IDENTIFIABLE INFORMATION ON CASUAL VISITORS NOT COLLECTED AND RETAINED:** Website users who wish to read or print information from Livingston County's website do not have to provide personal information. However, County agencies may request personal information needed to provide specific services requested by website users. Any personal information collected by County agencies will be only that which is necessary to provide services and will be handled in the same manner as it would be for an in-person visit to the agency.

Information that is generally available to the public during an in-person visit to a Livingston County agency, and is not confidential nor exempt from disclosure under the Freedom of Information Act (FOIA) or other statutes, may be posted for online access through the County's Online Services website. Personal or other nonpublic information that does not require disclosure under FOIA will not be disclosed to third parties or other public agencies, unless otherwise required by law or court order.

2. **SOME UNIDENTIFIABLE INFORMATION MAY BE ROUTINELY COLLECTED:** In order to provide new services, improve website usability, and facilitate access, Livingston County uses software to aid in the statistical analysis of website traffic. Information that is not personally identifiable to a website user (such as the user's internet protocol (IP) number, browser client type and version) is collected and used for this purpose. The County websites do not attempt to associate this data with information that is personal, nor is it used to generate a user profile to create targeted content.
3. **USE OF CONSTITUENT'S E-MAIL ADDRESSES:** E-mail addresses and other personally identifiable information obtained as a result of a request to the County website will not be sold nor disclosed to private companies or other public agencies, except where required by law or court order. E-mail addresses or other information requests sent through the County website may be maintained in order to respond to the request, to forward the request to the appropriate department or agency, or to provide website user help desk support services, such as the confirmation of an online order to the user.
4. **DATA SECURITY AND ENCRYPTION:** The County maintains security standards and procedures regarding the unauthorized access to personal and other proprietary information to prevent unauthorized removal or alteration of data. The County shall provide its website users with a secure online experience by using a variety of security measures that conform to currently accepted information technology industry standards. Any third party that has responsibility for this information is required by contract to follow the same security policies and guidelines as Livingston County in protecting this information.

All user information shall be contained behind a firewall and shall only be accessible by a limited number of employees who have special access rights to privileged systems. All sensitive credit or personal information supplied by users shall be securely transmitted online via Secure Sockets Layer (SSL) technology, utilizing at least 128-bit encryption strength, and shall remain encrypted within a secure database.

Credit card information is used only: 1) to authorize user-initiated transactions for online service purchases; or 2) to provide anti-fraud measures by ensuring that a refund is issued back to the same cardholder for the transaction that was originally charged. When processing an online transaction on the County Online Services website, no more than 4 digits of any credit card number shall be displayed unencrypted after a user has submitted the full number to the County website.

5. **USE OF "COOKIES":** Some Livingston County web applications may use "cookies." A cookie is a small text file written to a user's computer hard drive upon visiting a website. A cookie file can contain information such as a user ID, which may be used to track the pages a user has viewed during the last visit to that website, or to permit access to premium content that the user has purchased. The cookie is only a text file and cannot read data from a user's hard drive or read other cookie files created by other websites. A user can deactivate their browser's ability to accept cookie files from some or all websites by changing the settings or preferences in their browser software. Livingston County will attempt to minimize the use of cookies on its websites; however, they may be required for access to some of the online applications on the County websites.
6. **PASSWORDS & USER IDS:** In some instances, users may be required to receive or create an ID and password to access or submit personal or proprietary information to complete certain transactions. All passwords will be encrypted and stored on a secured database.
7. **NON-COUNTY WEB SITES:** Various websites may be linked through the Livingston County websites. The links that appear on the webpage are solely for the information of the user. Livingston County does not endorse any particular viewpoint, product, or service that appears on any website that appears as a link from a County webpage. Livingston County makes every reasonable effort to assure that it does not link directly to web pages that contain obscene, scurrilous, or otherwise objectionable material. If you encounter objectionable material on a County webpage or on any linked webpage, please notify the County website administrator immediately.

RESOLUTION #2006-07-039	APPROVED: JULY 17, 2006
--------------------------------	--------------------------------

RESOLUTION ATTACHED

S:\WP\Policies\Online Privacy Policy.Doc

RESOLUTION

NO: 2006-07-239

LIVINGSTON COUNTY

DATE: July 17, 2006

RESOLUTION TO ADOPT A COUNTY ONLINE PRIVACY POLICY FOR LIVINGSTON COUNTY OFFICIAL WEBSITES – Information Technology Department / General Government Committee / Finance Committee

WHEREAS, it has been determined that an Online Privacy Policy is needed to ensure the data security and protection against unauthorized disclosure of personal, proprietary, and other non-public information that may be gathered from users or provided online through Livingston County’s Online Services Portal or other official County websites; and

WHEREAS, an Online Privacy Policy will protect the security and integrity of information obtained by the County through its official websites and will also ensure that data security standards and procedures are established and maintained to provide a secure online environment for constituents to transact information and service requests through the Online Services Portal; and

WHEREAS, this Policy has been prepared by the Online Services Task Force and the Information Technology Department, in cooperation the County’s contract web application development vendor, WebTecs, and has been reviewed the County’s Civil Counsel.

THEREFORE BE IT RESOLVED that the Livingston County Board of Commissioners hereby adopts the attached Online Privacy Policy and authorizes its posting on all official County websites.

#

MOVED: Commissioner Williams
SECONDED: Commissioner VanHouten
CARRIED: 9-0-0