#### POLICY AND PROCEDURE MANUAL

Pennington Biomedical	POLICY NO. 607.00	ORIGIN DATE: 3/17/2009
IMPACTS:	All Employees	LAST REVISED: 11/20/2015
SUBJECT:	Web Privacy	EFFECTIVE: 3/17/2009
SOURCE:	<b>Computing Services</b>	VERSION NO. 2

# **Purpose**

Websites are popular tools in collaborative research and increasingly play an important role in the fulfillment of Pennington Biomedical Research Center's mission. In order to promote the use and effectiveness of Pennington Biomedical websites, it is important to adopt practices which protect the privacy of Internet users, as well as procedures to ensure that information privacy standards are met for all pbrc.edu websites. This policy outlines the standards developed by Pennington Biomedical Computing Services regarding privacy policies for websites in the pbrc.edu domain.

## **Applicability**

This policy is applicable to any user of Pennington Biomedical computing resources including all employees, whether paid or on gratis appointments, full-time or part-time, students, faculty (including adjunct), administrators, and support personnel of any type, as well as contractors, non-employee collaborators and employees of Pennington Biomedical-related foundations.

Further, the policy applies to all information resources whether individually controlled, shared, stand alone, or networked. Information resources in this policy are meant to include any information in electronic, audio or visual format, or any hardware or software that make possible the storage and use of such information. This policy applies to all computer and computer communication facilities owned, leased, operated, or contracted by Pennington Biomedical, including, but not limited to, desktop computers, laptop computers, network servers, minicomputers, and associated peripherals and software, whether used in administration, research, teaching, or for other purposes.

This policy applies to all websites within the pbrc.edu domain.

**Website Privacy Policy Required** 

All websites within the pbrc.edu domain must adhere to information practices and procedures that are designed to protect the privacy of the visitors to the website. A website privacy policy, either this Pennington Biomedical policy or a pre-approved alternate policy, must be adopted and published on the website. The privacy policy adopted by the website must reflect the actual privacy practices and procedures used on the website. All website privacy policies must require that information collected on the website, whether collected automatically or solicited from website visitors, be treated confidentially and, if stored, secured by physical and technical safeguards to ensure confidentiality. Information automatically collected from a website visitor must be limited in scope and clearly defined in the website privacy policy.

## **Default Privacy Policy**

The following privacy policy should be adopted by any website within the pbrc.edu domain by copying the text, exactly as herein written, to a webpage within the website which can be accessed by a link on the website. Although the wording of the default policy may not be modified without prior approval, the webpage may be customized with color, images, fonts and navigation controls to maintain the consistency and professional appearance of the website.

## **Privacy Policy**

Effective: July 1, 2015

Pennington Biomedical Research Center takes your Internet privacy seriously. We implement physical, electronic and managerial procedures and practices to safeguard your privacy and to protect your personal information. Although you are not required to give us personal information to visit this website, any information we collect is always handled confidentially. The following privacy policy outlines this website's information collection practices.

The following types of information may be collected on this website:

## Information We Collect and Store Automatically

When you browse this website, read pages or download information, we automatically collect certain information about your visit. We use this information to help us make this website more useful and to determine what information is of most and least interest to our visitors. We do not use or sell information automatically collected on this website for commercial marketing purposes. The information that may be automatically collected when you visit this website includes:

- The Internet domain (for example, "youruniversity.edu" if you connect from a university's domain, or "yourcompany.com" if you use a private Internet access account) and the IP address (an IP address is a number that is automatically assigned to your computer whenever you are surfing the Web) from which you accessed this website
- The type of browser and operating system you used to access this website
- The date and time you accessed this website
- The Internet address of the website from which you linked directly to our website
- The pages you visit on this website
- The links made to other websites through this website

#### Cookies

The Pennington Biomedical website uses cookies (a small file that uniquely identifies your browser) which help track traffic coming to our site, including visitor preferences and trends. We use this information to improve our website to better serve our audience needs. If users register on our site for any news or services, we will identify you with cookies to store your account preferences. You will always have a chance to opt out at any time.

Cookies enable us to recognize your web browser whenever you visit our website through the unique identification number assigned to the cookie, and this information is stored to help facilitate your use of the website the next time you visit. A "web beacon" is a small transparent image placed on a website that may track visits to a particular page. We use web beacons to collect information to support our reporting software.

## Information You Provide To Us

We collect personally identifiable information when you voluntarily provide it. For example, when you complete a study web screener, request a newsletter that we produce, or when you indicate that you would like to receive certain targeted information on topics of interest. If you choose to provide personal information to us, either by submitting a form containing your personal information on this website, or by sending us an email containing your personal information, we use your information only to fulfill the purposes stated on the website, and/or to respond to you or help our staff get you the information you requested.

#### **External Links**

Some webpages may include links to sites outside of Pennington Biomedical or LSU. These links are for your convenience only and Pennington Biomedical makes no representations or endorsements whatsoever regarding such other sites. You should review the privacy policies of other sites carefully before providing any information to such website. Pennington Biomedical is not responsible for the privacy practices or the content of these external sites.

If you have any questions or concerns about this privacy policy or this website, please contact webmaster@pbrc.edu.

## **Alternate Privacy Policies**

Any website within the pbrc.edu domain may have an alternate website privacy policy, provided that the alternate policy has been approved by both the Director of Legal and Regulatory Affairs and the Director of Computing Services prior to the launch of the website.

#### **Enforcement**

Failure to comply with this policy may result in the suspension of computer usage privileges, disciplinary action, possible termination of employment and civil or criminal penalties.



# **Policy Committee Secretary's Attestation**

Date of Policy Committee Meeting: Expedited er	nail review of revised policy 11/12/2015		
Policy #: 607.00, Web Privacy			
Date of Approval: 11/20/2015			
Publication Date: 12/7/2015			
Effective Date: 11/20/2015			
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Anne Duke, Policy Committee Secretary	Date		
Approval by the Executive Director			
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William T. Cefalu, MD	Date		
Executive Director			