



## NOTICE OF PRIVACY PRACTICES (NPP)

**THIS NOTICE OF PRIVACY PRACTICES** generally describes 211 San Diego’s practices both online and offline, regarding the collection, use, and disclosure of personally identifiable information and the rights of consumers regarding their own personal information. This privacy policy describes the categories of information we collect, the sources of personal information collected, how we use personal information, the categories of third parties with whom we may share your personal information and what choices you have regarding our use of your information. In order to fully understand your rights, we encourage you to read this entire **Notice of Privacy Practices**, and our **Cookies Policy**, all of which are available on our website at [www.211sandiego.org](http://www.211sandiego.org).

In this Notice, references to “Personally Identifiable Information” means any data relating to an individual consumer, (“Client” or “You”) or other individual that interacts with our organization to seek employment, as a customer, consultant, vender or donor who can be identified, directly or indirectly, based on that information. “We” or “us” or “our” means Infoline of San Diego and Imperial Counties, dba “211 San Diego.” “Third Party,” means and includes organizations other than 211 San Diego with whom we may share your Personal Information.

This policy applies to you and all information collected through your communications with us, whether in person, online through our website or mobile applications, on the telephone directly or via text, or email, as well as any information we may collect offline or receive from third parties (collectively referred to as the “Services”).

By accessing our Services or providing information to 211 San Diego or any of our network partners or agencies, you accept and agree to the practices described in this Notice of Privacy Practices.

### **What We Do:**

211 San Diego is a non-profit, public benefit corporation dedicated to providing programs and services that promote the welfare, health and independence of the people in our community. We serve as a 2-1-1 information resource and online data hub that provides referrals, care coordination, outreach, education, and other services to help individuals (Clients) in our community obtain health care, social services, government benefits or other services from other companies or agencies that are part of the 211 San Diego network (“Network Partners”). Network Partners provide Services to Clients that include, without limitation, health and human services, health care and health insurance, housing, food, transportation, employment and job training, elder care, benefits for the disabled, early childhood development, and disaster relief among other things. To learn more about 211 San Diego and the services we provide, and the Network Partners with whom we may share your Personal Information, please visit our website at [www.211sandiego.org](http://www.211sandiego.org).

### **Privacy of Information:**

211 San Diego is committed to protecting your Personally Identifiable Information. Not only do we implement technology and privacy practices designed to keep your information secure, but we also require the third parties with whom we may share your personal information, including our Network Partners and technology vendors to implement and maintain security measures to protect the privacy and security of your Personally Identifiable Information.

### **Changes to this Notice of Privacy Practices:**

We reserve the right to change this Notice and our Privacy Practices at any time. We reserve the right to make the revised or changed Notice effective for the Personal Information we have already collected, as well as any new or additional information we receive following the effective date of this Notice. We recommend that you review our Notice when you

access our site as you will not automatically receive a revised Notice of Privacy Practices when they are changed or updated.

### **How to Obtain a Hard Copy of this Privacy Notice:**

We will post a copy of the current Notice of Privacy Practices on our web site at [www.211sandiego.org](http://www.211sandiego.org). You have the right to receive a paper copy of this Notice and a copy will be mailed or emailed to you upon written request. See the section below on how to submit a Request.

### **Personal Information:**

While you are engaging with 211 San Diego or utilizing our Services, we may collect information that identifies you as an individual or that can be linked or is linkable to you as an individual ("Personal Information"). The categories of personal information we collect depends on our relationship with you, i.e. whether you are a Customer or Client for whom we are providing services, or a business entity providing us with Services, employee, volunteer, vendor or a Donor. Depending on our relationship with you, the categories of personal information we may collect can vary.

Information we may collect includes:

**Contact and Identifying Information:** name, email address, phone number, age, date of birth, social security number, driver's license or government identification number

**Demographic Information:** gender, race, ethnicity, marital status, household members, number of children, geographic location, primary language

**Health Information:** current condition, pregnancy, health care provider and treatment plans, medications, disabilities or other information needed to qualify you for enrollment in programs and benefits and coordinate your healthcare with your care team.

**Employment:** information about current or past employers, job skills, education or special training, and certifications

**Housing:** information about where you live, how long you have lived there and whether you have a need for housing or rental assistance.

**Family Planning and Reproductive and Sexual Health Services Information:** information about reproductive health and services.

**Food:** information about food resources and special dietary needs

**Program Enrollment:** whether you are currently enrolled in any social services programs or eligible for benefits offered by any of our Network Partners

**Call Recordings, Text and Email:** If you contact us for information or assistance by calling our 2-1-1 hotline or via text or email, we may record and maintain a transcript of the call.

**Individuals or Representatives of Companies who provide or receive services:** We may collect information about you such as your name, title, contact information and banking information for purposes of paying you for services.

**Sensitive Information:** Reproductive and Sexual Health Services, Substance Use Disorders, HIV, AIDs, Abuse, Neglect, Rape, and other highly sensitive information.

**Third-Party Fundraising:** We may use or interact with third parties to conduct fundraising campaigns, promotions or participate in a community event, including online platforms and to receive access to donor reports which include the donor's name, contact information and donation amount.

**Donors:** We may collect information about you in order to communicate with you about programs and services or other matters of interest and other information necessary for communication, accounting and tax records, and for other business purposes.

### **Where Personal Data Comes From:**

**Direct Interactions:** Personal Information we collect about you may come from a variety of sources including information you provide to us directly through our website or when you speak to one of our representatives on the phone or by calling our 2-1-1 hotline or by text. Personal Data may also be shared with us by third parties or a Network Partner that has provided services to you in the past, or that is providing services to you currently. Personal Information may also come from your family or household members, caretakers or personal representatives.

**Third Parties:** Network Partners in our network may include doctors, nurses and other healthcare professionals, public health agencies, insurers, social workers, housing officials, emergency medical services providers, and other professionals that provide or coordinate healthcare, mental health or behavioral health treatment, housing and emergency shelter, and programs that provide transportation, education, food and financial assistance, job placement and job training among other services. For Information our Network Partners, Please Visit: [www.211sandiego.org/partners/](http://www.211sandiego.org/partners/) .

**Automated tracking technologies, such as Cookies:** We use online automated tracking technologies that automatically collect information about your interaction with our Services and websites using various technologies such as cookies, web logs, beacons, and internet tags. To learn more about automated tracking technologies, please see our Cookies Policy.

### **211 San Diego Referral Clients and CIE Clients Who Give Permission to Use and Share Personal Information:**

When you or a family or household member, caretaker or personal representative provides us with Personal Information, you give us permission to share your information with our staff members and contractors in order to provide you, your family or household members with referrals and other services and to use your Personal Information in connection with our business operations, to protect the security of our systems and customers, to meet our contractual and legal obligations, for research, or any other lawful use or legal requirement as outlined below.

If you are a Client that consents to enroll in the Community Information Exchange, aka CIE, you also agree that we can share your Personal Information to refer you to one of our Network Partners. With your permission, we may also create a record and share your information with Network Partners providing services or other benefits to you or your family. If you disclose any Personal Information about your family, household members, representatives, caretakers or other people (“other people”) to us or to our Network Partners, you represent that you have the authority to do so and that we may use the information to contact the family, household, caretakers or representative you have identified and use the information in accordance with this Notice of Privacy Practices.

You have choices when it comes to the data you share. When you are asked to provide Personal Information, you may decline to provide some or all of the information requested and you can “Opt-Out” of sharing information with us or our Network Partners at a later date. You may also opt out of sharing indirect information such as Cookies. (Please see our Cookie Policy posted at <https://211sandiego.org/cookies-policy/> ). If you Opt-Out of sharing Personal Information or Cookies, we may be unable to provide some services to you, including referrals and/or assistance with applications for various government benefits. Even if you Opt-Out of sharing information, we may still use Personal Information that has already been disclosed to us in connection with our internal business operations, to provide services directly to you, to comply with applicable laws or for any other lawful purpose.

**We do not discriminate against individuals who exercise their rights under applicable law.**

### **Third Parties including Contractors, Vendors, and Donors:**

We may collect personal information for lawful business purposes, including for purposes of contracting for services, enforcing contracts or our legal rights, collecting or making a payment, and communication and for such other use as is customary for the type of engagement we have with you.

### **How We Use and Share Personal Information:**

We may use and share your Personal Information in accordance with this Notice of Privacy Practices, as permitted or required by applicable state and federal laws or as expressly permitted by you. The following list generally describes how we may use and share Personal Information:

#### **To Contact You, a Family or Household Member, Caretaker or Personal Representative:**

When you call our 2-1-1 hotline, you will be asked to provide us with contact information for yourself and other persons in your household or involved in your care. If you do so, you give us permission to use that information to contact you and the individuals you have identified by telephone, email or text. We may use the information to communicate necessary information about your appointments, to update you on your care or care management options, programs and benefits you or your family or household members may be eligible for, or to connect you with any of our Network Partners and to follow up with you, your care providers or our Network Partners about services you have received or programs you have been enrolled in and for feedback.

You may request that we communicate with you in a certain manner or at an alternative location. For example, you may ask that we contact you only at home. Your request must be in writing and specify the alternative means or location for communicating with you. Please refer to the instructions at the end of this Notice on how to make a request. We will accommodate a request for confidential communications that is reasonable based on our system capabilities.

#### **To Verify Your Identity**

We may use information or require you to provide us with information or proof to verify your identity or the identity of family or household members, caretakers or personal representatives before we share Personal Information or respond to a "request to know" the Personal Information we have collected about you.

#### **Referral for Treatment, Care Coordination, Case Management, Health Insurance, application for and the Determination of Eligibility for Benefits and Programs:**

We may disclose Personal Information to Network Partners to facilitate a referral or the delivery of healthcare, help you submit an application for health insurance or insurance benefits, care coordination, case management, to qualify and enroll you in county health and human services agencies programs and benefits, to receive benefits under Medicare, Medicaid, or the Social Security Administration, or other public agencies providing government funded health and human services programs benefits.

#### **Qualification for Other Programs and Benefits:**

We may use and disclose your Personal Information to help you enroll in programs or benefits that cover or reduce your utility bills, reduce debt or tax liability, to help with rent or pay for food and transportation, or for other programs and benefits.

#### **For Business Operations, Audit and Evaluation Studies:**

We may use and disclose your Personal Information for our internal business operations, in connection with an audit or evaluation study. For example, we may use Personal Information to review the quality of our referral services, and to

evaluate the performance of our staff. We may use Personal Information for our business planning and program development, and to investigate complaints. We may also de-identify or anonymize Personal Information so that it can be used to conduct evaluation studies, perform research or evaluate community needs and gaps in services, or conduct other studies to improve the health and well-being of our community.

**Business Associates:**

We may use or disclose protected health information to our subcontractors, and “business associates” when they perform services for us or when we provide services to a health care provider or insurance company that requires the use of protected health information.

**Vendors or Subcontractors:**

We may share your personal information with our vendors or subcontractors to the extent needed to perform a service or other function related to the Services we provide to our Clients or to provide services to us. Our vendors and subcontractors are required to protect the privacy and security of personal information while in their custody and control

**Public Health and Health Oversight Activities:**

We may use or disclose Personal Information for public health activities that are permitted or required by law. For example, we may disclose Personal Information, including protected health information to a public health agency to control or prevent the spread of a communicable disease, prevent injury or disability, for public health oversight activities or interventions. Oversight activities may include audits; investigations; inspections; licensure or disciplinary actions; or civil, administrative, or criminal proceedings or actions. Oversight agencies include government agencies that oversee the health care system, government benefit programs, other government regulatory programs, and government agencies that ensure compliance with civil rights laws.

**When Required by Law:**

We may disclose your Personal Information when required by law; such as in the course of a judicial or administrative proceeding or in response to an order of a court or administrative tribunal, a subpoena, a discovery request, or other lawful process, to law enforcement officials for law enforcement purposes, such as to; respond to a court order; locate or identify a material witness, or missing person; report suspicious injuries; or report a crime or identify a victim, or to a government authority that is authorized by law to receive reports of abuse, neglect, or domestic violence.

**Research:**

We may use and share Personal Information for research. Some research projects may require a special approval process and your written authorization. In some instances, the law allows us to conduct research using de-identified data without your permission.

**Other Uses and Disclosures of Personal Information That Require Special Permission**

**Disclosures Requiring Your Written Authorization:**

Some types of personal information are protected under state and/or federal law and require your formal consent before the information can be disclosed by an organization you provided it to. For example, disclosures of psychotherapy notes, substance use disorders, and uses and disclosures of protected health information by your health care provider, and uses and disclosures of Sensitive Information including Reproductive and Sexual Health. Unless an exception applies, we may require your written authorization in paper or electronic format using email, audio, video or electronic signature before we share your sensitive/protected personal information with any of our Network Partners. Once received, we may store a copy of your authorization electronically and share it with our Network Partners.

### **Marketing and Fund Raising:**

We may use information about programs and services utilized by you, dates of service and service outcomes or your feedback for fundraising, advertising or marketing purposes. However, before we use your Personal Information directly in connection with advertising or marketing to others we will ask for your written consent.

We may also send information about our programs and fundraising to you. If you do not want to receive fundraising, or marketing material, or information about the programs and services we offer, you may choose to Opt-Out of receiving those communications by sending your request to us in writing.

When you log onto our website, information in the form of Cookies, Web beacons, pixels and other types of metadata may be collected and shared with Google, Facebook and Twitter for analytics and to direct the services or goods from other companies to you. Please read our **Cookies Policy** and how to manage your Cookie preferences, including how to Opt-Out of sharing Cookies.

### **Sale of Personal Information:**

211 San Diego does not sell Personal Information and the third parties with whom it shares your Personal Information have agreed not to sell Personal Information as well.

### **Collection of Personal Information from Minors Under the Age of 13:**

We do not direct our communications or website to Minors. However, if a minor age 13 and older calls 2-1-1 for assistance, we may collect minimal information in order to satisfy the minor's request such as name, age, contact information and the contact information for the minor's parent or guardian. If we are unable to obtain parental consent we may still provide the minor with the referral requested. If we are able to obtain the parent's consent or authorization, the minor's record will be treated much like any other Client. With parental consent, a minor can assess services and freely communicate and share Personal Information with our Network Partners. Parents or guardians can change or revoke the minor's consent choices previously made and review, edit or request the deletion of the Personal Information of minors for whom they have provided consent or authorization. However, with respect to sensitive health services that a minor can legally consent to receive without a parent, we may deny a parent's request for information in compliance with applicable laws.

### **Retention of Personal Information:**

We will retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine retention periods include: the length of time we have an ongoing relationship with you; whether there is a legal obligation that requires us to store or delete Personal Information within a certain timeframe, and whether retention is advisable for purposes of statutes of limitation, litigation, audit or regulatory investigations, research, or our internal business purposes.

## **YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION**

### **Request to Know the Personal Information We Have Collected, Disclosed or Sold:**

You may request us to disclose certain personal information we have collected, used, or disclosed within 12 months of our receipt of your written verifiable request. You may also make a verifiable request on behalf of your minor child. If you wish to authorize a third party to make a request on your behalf, you must provide a valid California power of attorney or other evidence of lawful representation.

Provided we can verify your identity and/or authority to represent the individual about whom you request information, we will provide you a report of information collected within 45 days of receipt of your verifiable written request. If we require more time (up to 45 days), we will notify you of the reason and extension period in writing. If we cannot verify your identity

or comply with your request, we will notify you of the reasons, if applicable. We will send the report or our response to the mail or email address specified by you in your request.

If we are able to respond to your request, the report will set out the categories of Personal Information we have collected, the categories of sources of information collected, the purposes for collecting the information and the categories of third parties with whom we shared your Personal Information. The report will cover a twelve-month period preceding the date we received your verifiable written request and may include the following information; non-sensitive personal identifiers, demographic information, types of assessments we performed, categories of services you requested, categories of third parties you were referred to and with whom we shared your Personal Information.

All requests must be made either by email or in writing and delivered to the address indicated below, see **Requests**. We may require you to provide a declaration under penalty of perjury verifying your identity before we provide information that is deemed sensitive.

### **Right to Amend:**

We believe the Personal Information we collect about you should be current and accurate and we encourage you to contact us if any information you have provided to us in the past has changed or is incorrect. We will make a note of the correction or amendment in our records if you, your representative or a third party that has provided you services or referred you to us asks us to do so. If information was provided to us by a third party, you may also need to contact those third parties to correct or amend your information; we cannot make changes to information maintained by organizations that are not a Network Partner.

### **Right to Revoke Permission to Share:**

You may revoke your permission to share Personal Information or the Personal Information that concerns your minor under the age of 13, at any time in writing by mailing or emailing your verifiable request to the address listed below. Your revocation will be effective for future uses and disclosures of your Personal Information. The record of information we maintain about You will become inaccessible to our Network Partners and they will no longer be able to access your information in our system. However, the revocation will not be effective for information that we have used for our internal purposes, to provide Services to you, or already disclosed to a third party or Network Partner in reliance on your authorization or consent and prior to our receipt of your written revocation. After revocation, we will continue to store and use your Personal Information internally for our own business or other lawful purposes, including auditing, accounting, training and quality improvement and to provide services directly to you.

In most cases, a request to delete information will be treated as a request to opt out or a revocation of permission to share. Information about you may be retained for our internal business purposes as explained above.

### **Right to be Notified of a Breach:**

In the event your Personal Information is accessed by an unauthorized third party as a result of a breach or security incident we will notify you in writing or by email or other electronic means as required by applicable law at the email or mail address you provided to us.

### **Complaints:**

Please notify us directly, if you feel your rights have been violated or if you have concerns about how we use or share your Personal Information. We will do our best to address your concerns promptly and to your satisfaction.

## TECHNOLOGY DISCLOSURE

### Where Personal Information is Stored and Processed:

211 San Diego takes steps to ensure that the Personal Information collected under this Notice of Privacy Practices is processed in accordance with this Notice and the requirements of applicable law wherever the data is located.

Occasionally Personal Information may be stored, accessed or processed in a location outside the boundaries of the State of California or the United States by an employee or contractor. Regardless of the location or whether Your Personal Information is stored in paper or electronic form, our employees and contractors are required to protect the privacy and security of Personal Information and may face sanctions or other legal penalties if they fail to comply with this Notice of Privacy Practices and applicable federal and state laws.

### Security:

211 San Diego uses organizational, technical and administrative measures to protect Personal Information within our organization. We also require Network Partners with whom we share sensitive Personal Information, such as health information, to implement and maintain reasonable security and privacy measures to protect Personal Information.

### Cookies:

Cookies are small pieces of information, which are issued by your computer or mobile device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies are useful because they allow a website to recognize a user's device, let you navigate between pages efficiently, remember your preferences, and generally improve the user experience. Some of the cookies issued by the 211 San Diego web server last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to our web site(s) and will last longer.

Most web browsers automatically accept cookies. If you prefer, you may change your browser settings to prevent that or to notify you each time a cookie is set. For further information on cookies, including how to see what cookies have been set on your device and how to manage and delete them using different type of browsers, visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

The ability to enable, disable or delete cookies can also be completed at browser level. In order to do this follow the instructions provided by your browser, e.g. Firefox, Google Chrome or Microsoft Edge (usually located within the "Help", "Tools" or "Edit" facility). Disabling a cookie or category of cookies does not delete the cookie from your browser, you will need to do this yourself from within your browser.

Please note however, that by blocking or deleting cookies used on the 211 San Diego web site you may not be able to take full advantage of the site.

In some cases, browser based or flash-based cookie enabled websites may deploy behavior tracking and browsing history-based ad services. These types of cookies may act as a second level of authentication supplementing your user login or serve you ads that match your content browsing history and preferences. In any case, to control these third-party cookies may be controlled by you through your browser privacy setting.

For more information about Cookies and how to manage your preferences – Please see our **Cookies Policy**.

### How to Reach Us for Requests, Questions, Complaints:

Please submit all requests, complaints or concerns in writing to our Privacy Officer at: [privacy@211sandiego.org](mailto:privacy@211sandiego.org)