

## Homelessness Hub San Diego (H-Hub San Diego / H-Hub) Privacy Practices

The University of California San Diego (“UC San Diego”) and H-Hub know you care about the privacy and confidentiality of your information. We take protecting your privacy very seriously. Please read the following to learn more about how we treat your information when you use or access H-Hub websites, communicate with UC San Diego or H-Hub or participate in H-Hub programs or activities. These policies refer to individual data given when using H-Hub (user registration and survey information) and not to the data we provide and process (spatial data, maps, resource data, etc.).

User data we process:

- Registration and Account Setup Data
- Survey Data
- Device Data

How we use your identifiable data:

- Identifiable data will be used to understand who is using restricted data and how it is being used.
- If you are not requesting to use restricted data, we will not collect any identifiable data.

Others who process identifiable data:

- Partner organizations that provide restricted data will have access to identifiable data of users requesting their organization’s data.

How we protect your data:

- We store your information securely, with standard best practices in regards to encryption and storage.

Your rights:

- You may choose not to visit or use the H-Hub website or use H-Hub datasets and applications. If you choose not to use H-Hub’s third party service providers (i.e. Esri ArcGIS Hub), you may be unable to access and use H-Hub datasets and applications to its fullest extent.
- Restricted users have the right to rescind their registration and any data provided to H-Hub at any time.

Our contacts:

- Core Team: [hhub@ucsd.edu](mailto:hhub@ucsd.edu)
- UC San Diego Privacy Officer: [UCSDPrivacy@ucsd.edu](mailto:UCSDPrivacy@ucsd.edu)

For more detailed information, please read our full statement below.

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### Who we are and what we do

H-Hub is an open data repository on homelessness in San Diego County based at the University of California San Diego. While much of this data already exists from a variety of sources, it can be difficult and time-consuming to locate and view in relation to other relevant data. H-Hub will serve to collect, centralize, and streamline data for use by researchers, students, policymakers, elected officials, service providers, business leaders, and other community stakeholders.

The H-Hub is a site that centralizes and geocodes data related to homelessness in San Diego and makes it available and usable for researchers, policymakers, and other community stakeholders. There are two types of users: public and restricted.

A public user **will not be required to provide personally identifiable data** to access, view, download, and rehost H-Hub's public datasets, maps, resources, community StoryMaps, research StoryMaps, and events. The only data that may be collected is optional device location data for usage in our MYMapp application. The function of the website and its applications are not affected by choosing to not provide your device location data. The rest of this privacy policy will be applicable mainly to restricted users. Sections that apply to public users can be found [here](#), [here](#), and [here](#).

A restricted user **will be asked to create an account with H-Hub**. Restricted users will provide their contact information (email address), academic/professional affiliation, and research interests, among other data specified in the privacy policy. Being a restricted user increases user access to restricted datasets shared to H-Hub by its data and research partners. H-Hub uses personal data provided during account registration to ensure the permissible usage of restricted datasets. Restricted user data may also be shared with H-Hub data and research partners who request to see their respective data. Restricted users have the right to rescind their registration and any data provided to H-Hub at any time.

For purposes of the General Data Protection Regulation ("GDPR"), the data controller is the University of California, San Diego, with a location at 9500 Gilman Drive, La Jolla, CA 92093-0330.

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## What these Privacy Practices apply to

These practices apply to how we treat your information when you use or access H-Hub websites, communicate with UC San Diego or H-Hub or participate in H-Hub programs or activities. UC San Diego works in a distributed information technology environment; therefore, policies and procedures for other programs/applications may vary.

These Privacy Practices do not apply to the information practices or services offered by other organizations or individuals ("Third Parties"), including service providers, advertisers, sponsors and others linked to our website.

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## Key Terms

***H-Hub Restricted User data:*** Restricted User Data is personal data that we gather when users register with H-Hub to access data provided by community partners, organizations, and service providers that may include more sensitive information. This personal data includes the following: name, user ID, email address, phone number, preferred mode of contact, whether or not you have chosen to share your data, registration, employment type, field of study, university affiliation, user-provided location for certain applications, optional contributions to discussion boards and datasets, reasons for data access request, as well as how you heard about H-Hub.

**Identifiable data:** Any data that can be used to identify, contact, or locate an individual, either alone or combined with other easily accessible sources.

**Anonymized data:** Data that does not identify a specific individual; that is, data from which all identifiers, such as name, email address, and phone number, have been removed.

**Public User:** Users who have access to all of H-Hub's public datasets. Public users do not need to register and/or provide personal data for this access.

**Public datasets:** Data that is already publicly available but re-hosted by H-Hub. Re-hosted data may be cleaned and streamlined for usability. Any and all data is de-identified, if applicable. Access to these datasets does not require registering with H-Hub.

**Restricted datasets:** Data that is provided to H-Hub by data partners and institutions and is not publicly available. This data may be of value to researchers, academics, and policymakers but require sensitivity and caution when generalizing or presenting to the wider populace. Access to these datasets requires registering with H-Hub.

## The personal information we process

We process certain personal information for H-Hub Restricted User(s). H-Hub San Diego's public datasets can still be accessed without registering as a Restricted User. None of the following information is collected from public users, save for *Device Data* (outlined below). We will obtain information in the following ways:

- **Information you provide:**

- a. Registration and Account Setup

- When you create your account during the registration process, we collect personal information about you. As part of registration, name, user ID, email address, phone number, preferred mode of contact, whether or not you have chosen to share your data, registration, employment type, field of study, university affiliation, user-provided location for certain applications, optional contributions to discussion boards and datasets, reasons for data access request, as well as how you heard about H-Hub. This data is not obtained for public users who do not register with H-Hub.

- b. Surveys

- We may periodically send restricted users surveys to gather additional information about your H-Hub participation. Responding to surveys will always be voluntary.

- c. Device Data

- To utilize some H-Hub San Diego applications, such as the Make Your Own Map App (MYMapp), users are given the option to provide their device's location information to explore data near them. This data is only available to the application and is neither transmitted nor stored. This data may be collected for any user, restricted or not, depending on their usage.

- **Information we collect automatically:**

- a. Web browser cookies, logs, and device data

- As an organization, H-Hub does not place any cookies on your hard drive or collect logs or device data when you access our datasets or utilize our applications. However, since H-Hub utilizes the Esri ArcGIS Hub platform, users may be subject to information collection about your device and browser whenever you interact with ArcGIS Hub platform. You can read more about Esri's privacy policies regarding cookie collection [here](#).

*Marketing cookies:* H-Hub at UC San Diego does not use cookies. However, by utilizing Esri ArcGIS Hub for our site, users may be subject to cookie placement by Esri. Esri's marketing privacy policy regarding cookies can be found [here](#).

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## Why and how we use your personal information

We will only use your personal information as described below or as required or permitted by law.

We will use your data primarily for the purpose of understanding and contextualizing how restricted data is being used and/or for the operation of applications. For example, data partners who provide data may want to know the nature of the data usage (academic, governmental, non-profit, etc.)

We will use your data for the following purposes:

1. To provide appropriate access to Restricted Datasets to you as a service you request;
2. To provide you with technical support. This may arise when accessing and downloading data;
3. To provide you with information regarding H-Hub San Diego events and initiatives, and such events and initiatives of partner organizations. We will generally only do this where it is in our legitimate interest and where you have not objected or withdrawn any prior consent given;
4. To process and handle any complaints or inquiries made by you or legally on your behalf. We do this because it is in our legitimate interest as part of the services H-Hub San Diego offers to you;
5. When required or permitted by law, to disclose H-Hub San Diego data to authorities who can request this information by law that is binding on UC San Diego;
6. To assess or appraise our process for implementing H-Hub San Diego. It is in our legitimate interest to understand and improve our processes;
7. To improve website/application functionality, improve content, monitor website/application performance, and answer specific questions about the usage and performance of the site/app. It is in our legitimate interest to understand and improve our website and content;
8. To compile statistics and conduct research for internal and statutory reporting purposes. It is in our legitimate interest to understand, improve, and report on our programs;
9. To solicit feedback about the program. It is in our legitimate interest to continuously improve our programs;
10. To calculate participation rates among participants as a whole and by groups (e.g., locations, affiliation) and to design strategies to increase participation. It is in our legitimate interest to continuously improve the diversity, equity, and inclusion of our services;

When used for purposes (6) through (10), Restricted User Data may be combined with data provided by other UC San Diego departments, analyzed in aggregated format, and reported both to groups and individuals within UC San Diego and to outside groups for research, educational, and publication purposes. No identifiable information from you will be contained in the reports.

As part of our quality control process, your data will be checked for accuracy and corrected when necessary.

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## Information We Share with Third Parties and Transfers to Other Countries

H-Hub San Diego shares your Restricted User Data with our approved third-party partner organizations who provide data on our behalf. We may also need to share your Restricted User Data as required to respond to lawful requests

and legal processes; to protect our rights and property and those of our agents and others, including to enforce our agreements and policies; and in an emergency, to protect UC and the safety of our students, faculty and staff or any third party.

UC San Diego and H-Hub San Diego will never sell or license your information for marketing or commercial purposes.

If your Personal Data are shared with a third party, UC will require that the third party use appropriate measures to protect the confidentiality and security of your data.

We use Esri's ArcGIS platform to host H-Hub San Diego. Please review [Esri privacy policies](#) for additional information.

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## **How We Protect Personal Information**

H-Hub San Diego is committed to protecting the security of your personal information. We maintain technical, physical, and administrative safeguards to protect the security, integrity, and privacy of personal data, including the following practices:

- a) storing information we collect on two-factor identification-protected computer systems located in controlled facilities with limited access;
- b) protecting the transmission of your information over the Internet, through the use of encryption, such as the Secure Socket Layer (SSL) protocol;
- c) using a variety of security technologies and procedures to help protect your personal information from unauthorized access, use, or disclosures; and
- d) limiting access to data to only authorized personnel.

We endeavor to protect the privacy of the personal information we hold in our records, but we cannot guarantee complete security. Unauthorized entry or use, hardware or software failure, and other factors, may compromise the security of your personal information.

H-Hub San Diego's website contains links to additional programs and websites associated with UC San Diego. When following a link to another website, you should read that website's privacy policy and make sure that you agree with it and can accept it.

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## **International Transfer of Your Data**

For H-Hub San Diego participants from the European Union/European Economic Area: In order to fulfill the intended processing purposes described above, your Restricted User Data will be transferred internationally, including outside of the European Economic Area (EEA), specifically to the United States, which does not protect Personal Data in the same way that it is protected in the EEA. UC will undertake appropriate measures to ensure adequate protection of Program Data, including utilizing appropriate physical, administrative, and technical safeguards to protect Program Data, as well as executing standard contractual clauses approved by the European Commission or a supervisory authority under GDPR, or obtaining your consent, where appropriate.

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## **How Long We Keep Your Identifiable Data**

H-Hub San Diego will retain Restricted User identifiable information for 3 years from the last date of user activity. Accounts will be disabled after 5 years from the date of their content being last viewed. We will retain data request information for 3 years.

Information about how long different types of information are retained by UC San Diego is published at: <https://www.ucop.edu/information-technology-services/services/system-wide-it-services/uc-records-retention-schedule.html>

## How Long We Keep Uploaded Data

UCSD H-Hub researchers may request the right to retain uploaded data in the event that a Restricted User becomes inactive. By default, uploading data to H-Hub confers the right to H-Hub to rehost said data. This is to pursue the construction of sustainable and organized community-sourced data that is maintained for open use. You will have the choice to indicate whether you grant permission to UCSD H-Hub to delete data you upload in the event your registration is terminated. You may address and change this permission at any time by emailing [hhub@ucsd.edu](mailto:hhub@ucsd.edu).

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## Knowing Your Choices and Rights

You may choose not to visit or use the H-Hub San Diego website or use H-Hub datasets and applications. If you choose not to use H-Hub San Diego's third party service providers (i.e., Esri ArcGIS Hub), you may be unable to access and use H-Hub datasets and applications.

You may choose to set your web browser to refuse cookies, or to alert you when cookies are being sent. If you choose to reject cookies, some parts of Esri's ArcGIS Hub platform that H-Hub is built upon may not function properly or as efficiently. You can read more about cookie usage [here](#).

You have a right to:

- **Access your identifiable H-Hub San Diego Data**, as well as information relating to the recipients of Restricted User Data, the purposes of processing Restricted User Data, the duration for which the Restricted User Data will be stored, and the source of Restricted User Data that has not been provided by you;
- **Rectify or correct inaccurate or incomplete Restricted User Data** concerning you, taking into account the purposes of the processing, and the right to have incomplete Restricted Data completed;
- **Move your Restricted User Data** to another controller or processor. UC will facilitate the lawful transfer of your data to the extent possible;
- Have your **Restricted User Data erased** in certain circumstances;
- **Restrict the processing of your Restricted User Data** in certain circumstances;
- **Object** to the processing of Restricted User Data in certain circumstances;
- **Withdraw your consent to the processing of your Restricted User Data**. The withdrawal does not affect the lawfulness of processing based on your consent before its withdrawal.
- Know whether your Restricted User Data are being used for **automated decision-making, including profiling**. In those cases, UC will give you meaningful information about the logic involved, the significance and the envisaged consequences of such processing for your data, and the right to request human intervention; and
- **Lodge a complaint**

UC may be obligated to retain H-Hub Data as required by U.S. federal or state law.

If you wish to exercise your rights, you can contact the UC Privacy Officer identified below.

You may exercise your rights and submit any questions or concerns using the procedure under “Contacting Us.” Please do not include any personally identifiable or other sensitive information in an email or voicemail message.

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## **Changes to this Privacy Policy**

This Privacy Policy will be updated periodically to reflect any material changes in our programs and practices. These changes will be evident by inserting a new “Effective Date” (see below) and are effective when they are posted to our website at: <https://hhubsandiego-ucsdonline.hub.arcgis.com/>. Treatment of information we collect now is subject to the version of the Privacy Policy in effect at the time such information is collected.

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## **Contacting Us**

If you have any general questions about how your personal information is used by H-Hub San Diego or wish to exercise any of your rights, please contact the Core Team by e-mail at [hhub@ucsd.edu](mailto:hhub@ucsd.edu), call us (858)-822-0468, or contact the UC San Diego Privacy Officer at [UCSDPrivacy@ucsd.edu](mailto:UCSDPrivacy@ucsd.edu).

### **Effective Date**

This policy is effective as of 04/01/2020.