

# Privacy Notice

Millcreek (the “City”) understands the importance and sensitivity of your personal information, and we have security in place to protect it. Access to your information is limited to those who need it to perform assigned tasks. We restrict access to work areas and use security measures and password-protected computer systems to keep your personal information secure. We follow federal and state laws that govern the use of your personal information. We use your information in written, oral, and electronic formats (and allow others to use it) only as permitted by federal and state laws. These laws give you certain rights regarding your personal information.

## Purpose of Privacy Notice

The City is committed to protecting the personal information of those accessing its website and those accessing City government services in person. The purpose of this notice (this “Notice”) is to inform those accessing the City website at [www.millcreekut.gov](http://www.millcreekut.gov) and those accessing government services in person regarding the collection and use of personally identifiable information.

## Definition of Personally Identifiable Information

For purposes of this Notice “personally identifiable information” means any information relating to an identified or identifiable individual who is the subject of the information. This information could include information that identifies a user by name, account number, physical or mailing address, email address, telephone number, Social Security number, credit or debit card information, or bank account information. This information may include any combination of the above or other personal information that could be used to determine identity.

## Personally Identifiable Information Not Routinely Collected

Visitors to the City website do not have to routinely provide personal information to visit the website or to download information. Government agencies may request personally identifiable information from you to provide requested specialized services, but such information is handled as it would be if obtained during an in-person visit to a government office.

We do not collect any personal information from a visitor to our site unless that visitor explicitly and intentionally provides it. Under no circumstances do we collect any personal data revealing political opinions, religious or philosophical beliefs, health status, or sexual orientation. If you are simply browsing our site, we do not gather any personal information about you.

## Information We Gather from You

The City only collects personally identifiable information that is required to provide services. You can decline to provide us with any personal information on the website or in person at any time. However, if you choose to withhold requested information, we may not be able to provide you with the online services or government-provided services dependent upon the collection of that information.

There are several ways in which you affirmatively provide us with, and consent to our collection of certain personal information:

*User Submissions* — Some of our online City services allow users to submit suggestions, comments, or requests to us. This could be by emailing us, filling out an online form to provide comments and suggestions, or reporting a problem. This data may include personally identifiable information such as name and email address. We will use the information you send us to respond. We may also direct your message to another government agency that can help in addressing your request.

*User Accounts* — Some digital City services involves the creation of user accounts. Creating an account may involve the submission of personally identifiable information. This could include a username, password, email address, mailing address, telephone number, full name, employment, and other history, etc. We do not use this information to send to commercial and marketing messages. We will only use this information to provide you with government services.

The City will make every reasonable effort to protect your privacy. It restricts access to your personal identifiable information to those employees that will respond to your request or inquiry. The City does not intentionally disclose any personal information about our users to any third parties inside or outside the City except as required by law or to provide a service for which the City has contracted with a third party.

## **Information We Automatically Collect and Receive**

Like most other websites, the City's website collects certain information automatically and stores it in log files. The information may include internet domain and internet protocol (IP) addresses of the device or network you are using to access our site, the region or general location where your computer or device is accessing the internet, browser type and operating system used to visit our site, the date and time of when you access our site, other usage information about the use of the City's website, and information on the history of the pages you view. This information does not identify you personally. We do not collect this information to provide targeted advertising. The data collected serve as part of our statistical analysis about the use of our website so we may better design online services and improve access to them. We analyze traffic to our services in various ways, including using third-party services.

*Use of Cookies* – We use “temporary cookies” on some parts of [www.millcreekut.gov](http://www.millcreekut.gov) , and such temporary cookies expire upon the end of the browsing session. The use of cookies is a standard practice among Internet websites. Most Internet web browsers may be customized to reject cookies, to only accept or reject cookies by user intervention, or to delete cookies. Rejecting and/or removing cookies, however, may lead to loss of functionality on selected pages requiring cookies to function fully.

## **Access to Personally Identifiable Information From Governmental Websites and the Governmental Records Access and Management Act**

As a municipal government, the City is a public governmental body subject to Chapter 2, Title 63G of the Utah Code, entitled the Government Records Access and Management Act (“GRAMA”). Information about GRAMA can be found on the Utah State Legislature website at <https://le.utah.gov/xcode/Title63G/Chapter2/63G-2.html>. If an appropriate request is made to the City for information that is subject to disclosure under Chapter 2, and not made confidential elsewhere in the Utah Code, the City may be required to disclose the information requested even if it may include your personally identifiable information. While Chapter 2 sets the general policies for access to government records in the state of Utah, other sections of the Utah Code as well as other federal laws also deal with confidentiality issues.

All records that are prepared, owned, received, or retained by a governmental entity that may be reproduced by certain means are considered public, unless they are private, controlled, or protected, as outlined in GRAMA, or are records to which access is restricted according to court rule, other State law, federal law, or federal regulation. Information that is generally considered public record under GRAMA and not made confidential elsewhere in the Utah Code or by federal law, may be subject to electronic access through the City’s website. Personally identifiable information is not a classification of records under GRAMA.

### **Use of e-mail addresses**

E-mail addresses obtained as a result of a request to the City website will not be sold or provided to private companies by the City for marketing purposes. The information collected is subject to the access and provisions of GRAMA, other applicable sections of the Utah Code or federal law. E-mail or other information requests sent to the City website may be maintained in order to respond to the request, forward that request to the appropriate department, communicate updates to the City webpage that may be of interest to citizens, or to provide the City web designer with valuable customer feedback to assist in improving the site. Individuals will be provided with the ability “opt out” at any time of any communications regarding new service updates.

### **Third-party Services**

The City and elected offices contract with third parties for certain services such as web traffic monitoring, website optimization form submissions, and workflow tools and financial transactions. Some user accounts created on contracted third-party systems may be linked with other third-party websites, such as social media networks. To link your accounts, you must provide your display name or user ID to those third-party websites. You may also be required to engage in an authorization process with each of those websites. We do not receive or store your password from those websites.

Whenever you use a third-party service linked from the City website, you are also agreeing to that service’s Privacy Policy.

### **What Happens After You Provide Personal Information**

Our intention in collecting information is to provide users with smooth and efficient online City service experiences. We generally respond to any e-mail questions, requests for services, and other

inquiries that we receive. We may retain this correspondence to improve our services, our website, and for other disclosed purposes. We may retain contact information so that we can send individual updates or other important information.

## **Data Security**

The City is committed to data security and the data integrity of personally identifiable information that is either available from or collected by governmental websites and takes reasonable precautions to protect personally identifiable information from loss, misuse, or alteration. We maintain physical, technical, and administrative safeguards. We update and test our security technology on an ongoing basis. We restrict access to your personal data to those employees who need to know that information to provide benefits or services to you. When a City application accepts credit cards or any other particularly sensitive information for any of its services, it encrypts all ordering information, such as your name and credit card number, to protect its confidentiality. However, as with any transmission over the Internet, there is always some element of risk involved in sending personal information. Unless otherwise prohibited by state or federal law, rule or regulation, an individual is granted the ability to access and correct personally identifiable information whether the information inaccuracy was accidental or by created unauthorized access. Visitors should be aware, however, that even though protections are in place, the City cannot guarantee against the occurrence of hardware failure, unauthorized intrusion, or other technical problems.

## **Non-City Websites**

Various web sites may be linked through [www.millcreekut.gov](http://www.millcreekut.gov). Many of these sites, including private sector sites, are not subject to GRAMA and may also not be subject to other sections of the Utah Code or federal law. Visitors to those sites are advised to check the privacy notices of these sites and be cautious about providing personally identifiable information without a clear understanding of how the information will be used. Visitors may want to consult guidelines on protecting your personal information such as those recommended by the Privacy Alliance, at <http://www.privacyalliance.org/protection/>.

The City and [www.millcreekut.gov](http://www.millcreekut.gov) are not responsible for the privacy practices, privacy notices or content regarding these other sites.

## **Information Storage**

Retention of records obtained from the City's website and other sources follows the City's records retention schedule. Retention timelines can vary depending on what kind of information you provide.

## **Sharing Information**

We may share information or statistics with third parties or the public in an anonymous form that does not directly identify you. This would typically be done to assess an online City service. No personally identifiable information would be released. Additionally, if a user is having issues with an online City service, we may share information with outside parties to the extent necessary to troubleshoot the issues or enhance the performance of the system.

## **If We Are Required by Law to Disclose Information**

Under certain circumstances we may be required by law to disclose certain information to law enforcement authorities. Suspicious email, electronic threats, unauthorized access or any information on illegal activity may be provided to the appropriate authority.

## **Children's Information**

Our online City services are intended for use by adults. We do not knowingly collect personal information from children under 13 years of age. However, we also do not try to determine whether a visitor is underage, therefore users should be aware that personally identifiable information submitted to [www.millcreekut.gov](http://www.millcreekut.gov) by minors will be treated as information given by an adult and may become subject to Public Records Requests as controlled primarily by GRAMA. If you are a parent or legal guardian of a child under the age of 13 who you believe has submitted personal information by use of our Services, please contact the City's IT Manager immediately.

## **Changes to this Privacy Notice and Security Policy**

The City may change this Privacy Notice from time to time and reserves the right to do so without notice.

## **How to Contact Us**

Questions regarding this Privacy Notice should be directed to the City's IT Manager. Please specify in the subject line of your e-mail "Privacy Notice." You may also contact us at the following:

Millcreek  
Attn. IT Manager--Privacy  
1330 East Chambers Avenue  
Millcreek, UT 84106  
Email: [khansen@millcreekut.gov](mailto:khansen@millcreekut.gov)

**Effective Date of this Notice:** April 17, 2024.