

Erie County Water Authority

Privacy Policy

Revised and Amended March 26, 2019

Overview

Welcome to the website of the Erie County Water Authority (the “ECWA”). This website (the “Site”) is designed to make it easier and more efficient for our customers and visitors to learn about ECWA and to interact with us.

ECWA recognizes that you are concerned about your privacy. The ECWA is committed to protecting your privacy when you access our Site and the online services we offer. Consistent with the provisions of the Internet Security and Privacy Act, the Freedom of Information Law, and the Personal Privacy Protection Law, this Privacy Policy is designed to help you understand, among other things:

- (i) The types of information we collect from you when you use the **ECWA’s** Site, ecwa.org (<https://ecwa.org>);
- (ii) How we use the information we collect through the Site; and
- (iii) With whom and why we share it.

By accessing and continuing to use the Site, you accept the Privacy Policy in its entirety and without modification and consent to our collection, use and sharing of the information as described herein, including information collected before the Revised and Amended date noted above. If you do not agree with this Privacy Policy, please do not use this Site.

Personal Information

For purposes of this policy, "personal information" means any information concerning a natural person which, because of name, number, symbol, mark, or other identifier, can be used to identify that natural person. The ECWA will only collect personal information about you when you provide that information voluntarily by sending an email, or by initiating an online transaction, such as responding to a survey, account registration, signing up for the ECWA Alert System, or completing a payment/order form.

You may choose to submit Personal Information in a registration form or by paying for services on this Site. Personal financial information will be submitted via a secure socket layer and held only by our contractors, Paymentus and Key Bank. In some, but not all instances, personal financial information is protected from disclosure by law. If it is not protected, then it may be inspected by the public or disclosed in a legal proceeding.

Your choice to not participate in these activities will not impair your ability to access certain information; however it may impair your ability to use some of the services offered on this Site. It shall not prevent you from requesting services or products from the ECWA by other means and will not normally have an impact on your ability to take advantage of other features of the Site, including browsing or downloading most publicly available information.

What Information Do We Collect?

ECWA collects information in two ways:

- (i) Directly from you when you provide it to us by using this Site; and
- (ii) Automatically through the use of technology as you navigate and use the Site.

Information You Provide Us

ECWA collects a variety of information that you provide to us when accessing and using the Site. Such information may include your name, account number, email address, phone number, and address and payment information. For example, to enable you to make a payment or register for automatic payments, you may provide us with your name, address, phone number, ECWA account number, email address, bank name, bank account and routing numbers.

Information Collected Automatically When You Visit the Site

When visiting this Site, ECWA automatically collects and stores certain information about your visit. The information we collect in this manner may include:

- (i) The Internet Protocol Address and domain name of your internet service provider. The Internet Protocol Address is a numerical identifier assigned either to your internet service provider or directly to your computer, which can be used to direct internet traffic to you;

- (ii) The type of browser and operating system used;
- (iii) The date and time you visited the site;
- (iv) The web pages or services you accessed at the site;
- (v) Session ID; and
- (vi) If you downloaded a form, the form that was downloaded.

None of the foregoing information collected in this paragraph is deemed to constitute personal information.

Cookies

Cookies are simple text files stored on your web browser to provide a means of distinguishing among users of this Site. The use of cookies is a standard practice among Internet websites. In order to better serve you, the ECWA uses cookies to enhance or customize your visit to the Site. The ECWA may use the cookie feature to store a randomly generated identifying tag on the device you use to access the Site. A “persistent cookie” enables the site to recognize you when you return to the Site. They will only be used if you interact with the Site by closing the alerts. The cookie expires seven (7) days from the last dismissed alert. These cookies do not contain personal information and do not compromise your privacy or security. Cookies can be erased during operation of your browser or when your browser is closed at your discretion.

Refusing or deleting these cookies can limit your ability to take advantage of some features of the Site.

How Do We Use the Information We Collect?

ECWA uses the information you provide us through the Site, including any personal information, in several different ways including:

- i. Responding to and communicating with you about your questions and comments;
- ii. Providing you with services you are requesting, including, facilitating payments, signing you up for the ECWA Alert System and managing your account;

- iii. Operating, evaluating and improving our Site's content and services;
- iv. Performing data analyses to help ECWA understand how you are interacting with the website;
- v. Any other purpose disclosed by us when you provide the information; and
- vi. Any other business purposes.

Information Collected When You Email the Site or Initiate an Online Transaction Through This Site

If you send an email to ECWA, your email address and the contents of your email will be collected. The information collected is not limited to text characters and may include audio, video, and graphic information formats included in the message. Your email address and the information included your message will be used to respond to you, to address issues you identify, to improve the website, or to forward your message for appropriate action. Your email address shall not be collected for commercial purposes and the ECWA is not authorized to sell or otherwise disclose your email address for commercial purposes.

During your visit to the Site you may initiate a transaction such as a survey, account registration, signing up for alerts, or initiating an order/payment form. The information, including personal information, volunteered by you in initiating the transaction is used by the ECWA to operate ECWA programs. The information collected by the ECWA may be disclosed by the ECWA for those purposes that may be reasonably ascertained from the nature and terms of the transaction in connection with which the information was submitted.

During your visit to the Site you may provide your cell or home phone number to receive SMS messages, text messages, or telephone calls from the ECWA. This information, volunteered by you in initialing the transaction will only be used to operate ECWA programs, which include the provision of goods, services, and information such as alerts. By providing your cell or home phone number, you provide your express written consent to the ECWA for use of your cell phone number for those purposes that may be reasonably ascertained from the nature and terms of the transaction in connection with which the information was submitted.

Children's Privacy

This Site is not intended for children. The ECWA does not knowingly collect personal information or create profiles of children. If we become aware that a child has submitted personal information or is attempting to do so, we will delete any such personal information from our records.

Subject to the provisions above, the collection of personal information submitted in an email or through an online transaction will be treated as though it was submitted by an adult, and may, unless exempted from access by federal or State law, be subject to public access.

Disclosing Your Information

Employees of the ECWA are prohibited from disclosing any information you provide, except as provided or required by court order or other law (for example, the Freedom of Information Law, which requires the ECWA to make certain information available to the public upon request). We use information you provide, such as your email address or cell phone number, only to send you information you have requested. We will use information you provide us in connection with an online application to process your request. The ECWA does not sell, rent, loan, trade or lease email addresses or other personal information collected on our Site. However, the ECWA may collect or disclose personal information without your consent if the collection or disclosure is:

- i. Necessary to perform the statutory duties of the ECWA;
- ii. Made pursuant to a court order or by law;
- iii. For the purpose of validating your identity; or
- iv. If information is used solely for statistical purposes and is in a form that cannot be used to identify any particular person.

Further, the disclosure of information, including personal information, collected through the Site is subject to the provisions of the Freedom of Information Law and the Personal Privacy Protection Law.

The ECWA may disclose personal information to federal or state law enforcement authorities to enforce the ECWA's rights against unauthorized access or attempted unauthorized access to the ECWA's information technology assets or against other inappropriate use of the Site.

The ECWA shall not disclose to the public or otherwise make available to the public in any manner an individual's social security account number or confidential account information unless compelled by law.

How Long Do We Keep Your Personal Information?

The information collected through the Site, including emails, is to be retained by the ECWA for as long as it is needed for business or legal purposes. After that, we destroy it by making it unreadable or undecipherable.

Access to and Correction of Personal Information Collected Through This Site

You may submit a request pursuant to the Personal Privacy Protection Law, to the ECWA's Information Officer, to determine whether personal information pertaining to you has been collected through the Site. Any such request shall be made in writing to the Information Officer at the address listed in the Contact Section of this Privacy Policy and must be accompanied by reasonable proof of your identity. Reasonable proof of identity may include verification of a signature, inclusion of an identifier generally known only to you, or similar appropriate identification.

In the event that the ECWA has collected personal information pertaining to you through its Site and that information is to be provided to you pursuant to your request, the Information Officer shall inform you of your right to request that the personal information be amended or corrected under the procedures set forth in the Personal Privacy Protection Law.

Information Security

The ECWA has implemented procedures to safeguard the integrity of its information technology assets, including, but not limited to restricted employee access, firewalls, password protection, monitoring of the system and Site for unauthorized accesses, auditing of the system, and encryption of sensitive files that are sent or received. These security procedures have been integrated into the design, implementation, and day-to-day operations of the Site for the continued security of electronic content as well as the electronic transmission of information.

However, the transmission of information via the internet and any system of safeguards is never completely secure. We cannot guarantee the security of your information transmitted to our Site and any transmission of information is at your

own risk. We are not responsible for circumvention of any privacy settings or security measures contained on our Site.

Third Party Services

Some third-party services ECWA uses, such as Google Analytics, may place their own cookies in your browser. Google Analytics is a web analysis service provided by Google Inc. (“Google”). Google utilizes the data collected to track and examine the use of the site, to prepare reports on its activities, and share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network.

Please see <http://www.google.com/policies/privacy/partners> for information about how Google may use your information and how you may be able to control the information sent to Google.

This Privacy Policy covers only our use of cookies, and other similar technology, and not the use of such technology by third parties.

Third-Party Links Disclaimer

ECWA may provide links to third-party websites that we do not own or control. We are not responsible for the information collection practices of any website that we do not own or control. When you click on the links to third party websites you are leaving the ECWA Site and accessing these third party websites at your own risk. ECWA does not monitor or control the content of any websites linked to our Site and, therefore, we are not responsible for the products, services or content of any website linked to our Site or the terms of use or privacy practices employed by those other websites. We encourage you to review and understand the privacy practices of third-party websites before providing any information to or through them.

Changes in Privacy Notice

From time to time we may update this Privacy Policy. You should visit this page periodically to review any such changes to the Privacy Policy. Providing information to us after implementation of our new policy, and/or your continued use of the Site will be deemed your agreement that your information may be used in accordance with the new policy. If you do not agree with the changes, then you should not provide additional information to us, stop using the Site and you should notify us that you do not want your information used in accordance with the changes.

Contact

If you have questions or comments regarding this policy and/or inquiries regarding access to and correction of Personal Information collected through the Site, you can contact us by phone (716)849-8444, or by mail to Secretary to the Authority/Information Officer Erie County Water Authority, 295 Main Street, Room 350, Buffalo, New York 14203, or by email, privacy@ecwa.org