



Birch Aquarium Virtual Programs Privacy Practices

UC San Diego and the Birch Aquarium at Scripps care about the privacy of all purchasers and participants of our programs. Please read below to see how we use – or process – participant data collected online and how we protect participant privacy. We aim to be clear when we collect personal information online and not do anything you would not reasonably expect.

Data we process:

- Registration and payment information directly from you as a purchaser, including your contact information and participant information, using Convergence.net, CampDoc.com, or other forms or waivers
- Video and audio of Virtual Program participation through Zoom or other video conferencing
- Survey responses directly from you
- Cookies, logs, and device data

How we use your identifiable data:

- To administer Virtual Programs
- To process payments
- To provide technical support
- To contact you for events and promotions
- To request feedback
- In the event of an emergency
- To handle complaints

Others who process identifiable data:

- Convergence.net
- CampDoc.com
- Google.com
- Zoom Video Communications
- Facebook Advertising
- MailChimp Email Communication Service

How we protect your data:

- Using appropriate technical, administrative, and physical safeguards
- Limiting access to your and participant information
- Providing privacy and security training for employees

Your rights:

- See and correct the information we hold about you and participants
- Opt out of mailing lists and marketing communications
- Delete some of the information we hold
- Transfer your data to another service
- Complain about us

Our contacts:

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



Who we are and what we do

The Birch Aquarium at Scripps ("Birch Aquarium") is the public exploration center for the world-renowned Scripps Institution of Oceanography at University of California San Diego. Birch Aquarium administers a variety of virtual and in person programs for children and adults. For purposes of the General Data Protection Regulation ("GDPR"), the data controller is the Regents of the University of California, with a location at 2300 Expedition Way, La Jolla, California 92037.

What these Privacy Practices apply to

University of California San Diego ("UC San Diego") and the Birch Aquarium know you care about the privacy and confidentiality of your information as well as that of other participants you may be responsible for. We are committed to protecting the privacy of all including children/minors, and Birch Aquarium Virtual Programs are designed to reflect our compliance with the applicable requirements of the Children's Online Privacy Protection Act ("COPPA") and the EU General Data Protection Regulation ("GDPR"), and other applicable laws. We take protecting privacy very seriously. Please read the following to learn more about how we treat the information we collect online when you and others participate in Birch Aquarium programs or activities. 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.

Key Terms

Virtual Program data: Virtual Program data is personal data that we gather online as part of Virtual Programs. It includes the following: name, gender, email address, phone number, date of birth, preferred mode of contact, IP address or device ID, registration, location, video and audio of participants, data regarding program participation, as well as how you heard about the Program.

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, date of birth, phone number, have been removed.

The personal information we process

As part of Virtual Programs, we process certain personal information about participants. 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 and other participants. UC San Diego has contracted with Convergence.net, CampDoc.com, and Google.com to provide platforms to collect registration documentation, including payment, legal waivers, consents, emergency contacts, and, when necessary, information about your child's health history. As part of registration, we collect your name, email address, phone number, address, payment information, and emergency contact information. We collect your child's name, gender, date of birth, grade level, and relevant health information. Birch Aquarium does not store any credit or debit card details. Payments are handled by a PCI-DSS compliant vendor.

- b. Virtual Programs

Mailing Address: 9500 Gilman Drive #0207, La Jolla, CA 92093-0207 · **Location Address:** 2300 Expedition Way, La Jolla, CA 92037

Phone: 858.534.FISH · **Fax:** 858.534.7114 · **Website:** aquarium.ucsd.edu



UC San Diego has contracted with Zoom Video Communications, Inc., (“Zoom”) to provide an online program experience. In order for individuals to participate in Virtual Programs, they will use Zoom to video conference with two educators and others participating in the program. There may potentially be teachers, group leaders, parents and siblings as well. Participants’ names, video, and audio may be accessible by others. Because Virtual Programs are interactive, participant activities, opinions, perspectives, behaviors, and statements will be transmitted through video conferencing platforms. We do not anticipate recording sessions at this time; we will notify you and ask for your consent before recording any sessions.

c. Surveys

We may periodically send surveys to gather additional information about you and/or other individual’s participation. Surveys are never sent to children.

● Information we collect automatically:

a. Web browser cookies, logs, and device data

As is true of most other websites and platforms, we collect information about your device and browser whenever you interact with the Birch Aquarium website. Our website may use “cookies” to enhance your experience. Your web browser places cookies on your hard drive for record-keeping purposes and sometimes to track information about you. Information may include the browser name, the type of computer, the region or location where your computer or device is accessing the internet, and technical information about your means of connection to our website, such as the operating system and the Internet service providers utilized and other similar information. Our traffic tools log information about your browser, your IP address, the pages you visit, the duration of your visit, and the documents or forms you use or download. In addition to log and cookie data, we also collect information about the device you’re using to access the Birch Aquarium services, including what type of device it is, what operating system you are using, device settings, unique device identifiers and crash data. Whether we collect some or all of this

information often depends on what type of device you are using and its settings. For example, different types of information are available depending on whether you are using a Mac or a PC, or an iPhone or Android phone. To learn more about what information your device makes available to us, please also check the policies of your device manufacturer or software provider.

Essential cookies: These cookies are essential for enabling user movement around our website and providing access to features such as your profile and purchases, UC San Diego-only resources, and other secure areas of the website.

Analytics cookies: We use Google Analytics cookies to collect information about how visitors use our website. These cookies collect information in the aggregate to give us insight into how our website is being used. We anonymize IP addresses in Google Analytics, and the anonymized data is transmitted to and stored by Google on servers in the United States.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on



Google's behalf. Google will not associate your IP address with any other data held by Google.

Marketing cookies: We also use a marketing database management program that deploys a cookie when a user interacts with a marketing communication, such as a marketing email or a marketing-based landing page on our website. This cookie collects personal information such as your name, which pages you visit on our website, your history arriving at our website, your purchases from the IAPP, and the like. Collected information is used to evaluate the effectiveness of our marketing campaigns or to provide better targeting for marketing.

b. Zoom info: Zoom collects device, location, and other information when you or a participant use the platform. Please review the Zoom Privacy Policy to understand what information Zoom collects automatically. Except for children registered for Birch Aquarium Programs, we do not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register themselves for the virtual programs.

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 administering the Virtual Programs for which you register participants. Participant's personally identifiable data are accessible only by the staff of the Birch Aquarium, their university-approved partners or vendors, and the IT personnel that maintain the data and websites.

We will use your data for the following purposes:

1. To deliver and administer virtual programming and enable your participation at events. This is generally required under the agreement we have with you;
2. To process your payments and donations. This is generally required to process a transaction requested by you;
3. To provide you with technical support. This is generally required to process a transaction requested by you;
4. To provide you with information regarding Birch Aquarium events and initiatives. 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. We do not send such information to children directly;
5. To enable us to contact others in the event of an emergency. This is required to address a vital interest or public health mandates;
6. 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 Birch Aquarium offers to you;
7. When required or permitted by law, to disclose Virtual Program data to authorities who can request this information by law that is binding on UC San Diego;
8. To assess or appraise our process for administering virtual programs. It is in our legitimate interest to understand and improve our processes;
9. To improve website/application functionality, improve content, monitor website/application performance, and answer specific questions about the usage and performance of the site/app;
10. 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;



11. To solicit feedback about the program. It is in our legitimate interest to continuously improve our programs;
12. To calculate participation rates among participants as a whole and by groups (e.g., locations, gender) and to design strategies to increase participation. It is in our legitimate interest to continuously improve the diversity, equity, and inclusion of our programs;
13. To apply for funding that will help promote children's education. It is in our legitimate interest to improve our programs;
14. For social media and other Birch Aquarium marketing purposes through Stephanie Liu Marketing LLC, who manages Birch Aquarium's Facebook Ads Manager.

When used for purposes (8) through (14), Virtual Program 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 or other participants will be contained in the reports. As part of our quality control process, your data will be checked for accuracy and corrected when necessary.

INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as your first and last name and e-mail address ("personal information");
- That is about you but individually does not identify you, such as what videos or pages you have clicked on, and how long you have spent on each page; and/or
- About your Internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- When you directly provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons, and other tracking technologies.

INFORMATION YOU PROVIDE TO US

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of subscribing to our emails, posting material, or requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website.
- Records and copies of your correspondence (including e-mail addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.

You also may provide information to be published or displayed (hereinafter, "posted") on public areas of the Website, or transmitted to other users of the Website or third parties (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to others at your own risk. Please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share information. Therefore, we cannot and do not guarantee that your information will not be viewed by unauthorized persons if you choose to share this information publicly or with other Users.

INFORMATION WE COLLECT THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES



As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs and other communication data, and the resources that you access and use on the Website.
- Information about your computer and Internet connection, including your IP address, operating system and browser type.

“Do Not Track” is a preference you can set in your browser to let websites you visit know that you do not want them collecting certain information about you. We do not currently respond to, or honor, Do Not Track signals or requests from your browser.

The information we collect automatically is statistical data and does not include personal information, but we may maintain it or associate it with personal information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- Flash Cookies. Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies.
- Web Beacons. Pages of our Website [and our e-mails] may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or [opened an e-mail] and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

HOW WE USE YOUR INFORMATION

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information or services that you request from us.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- To fulfill any other purpose for which you provide it.

Mailing Address: 9500 Gilman Drive #0207, La Jolla, CA 92093-0207 · **Location Address:** 2300 Expedition Way, La Jolla, CA 92037

Phone: 858.534.FISH · **Fax:** 858.534.7114 · **Website:** aquarium.ucsd.edu



- For any other purpose with your consent.

Information We Share with Third Parties and Transfers to Other Countries

Birch Aquarium shares your and participant Program Data with our approved third-party vendors who provide services on our behalf. UC San Diego uses approved third-party vendors and IT services for video conferencing, document storage, and processing of Program Data for the purposes identified above. We may also need to share your Program Data as required to respond to lawful requests and legal process; 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 Birch Aquarium will never sell or license your or participant information for marketing or commercial purposes. We will not share participant information for other purposes, except with your prior consent, as required or permitted by law, or to investigate a violation of law or policy.

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

We use the following approved third parties for our Programs: Zoom Video Communications, Google.com Convergence.net, and CampDoc.com. Please review their privacy policies for additional information.

How We Protect Personal Information

Birch Aquarium is committed to protecting the security of your and participant 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 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 or participant personal information.

The Birch Aquarium 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 or consent form and make sure that you agree with it and can accept it.

International Transfer of Your Data

For Program participants from the European Union/European Economic Area: In order to fulfill the intended



processing purposes described above, your Program 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.

How Long We Keep Your Identifiable Data

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>

Knowing Your Choices and Rights

You may choose not to visit or use the Birch Aquarium website or allow children you are responsible for to participate in Virtual Program activities. If you choose not to use the Birch Aquarium third party service providers, children you are responsible for will be unable to participate in Virtual Program activities. 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 the website may not function properly.

You have a right to:

- Access your Virtual Program Data and that of children you are responsible for, as well as information relating to the recipients of Virtual Program Data, the purposes of processing Virtual Program Data, the duration for which the Virtual Program Data will be stored, and the source of Virtual Program Data that has not been provided by you;
- Rectify or correct inaccurate or incomplete Virtual Program Data concerning you or children you are responsible for, taking into account the purposes of the processing, and the right to have incomplete Virtual Program Data completed;
- Move your Virtual Program Data to another controller or processor. UC will facilitate the lawful transfer of your data to the extent possible;
- Have your or participant Virtual Program Data erased in certain circumstances;
- Restrict the processing of your or participant Virtual Program Data in certain circumstances;
- Object to the processing of Virtual Program Data in certain circumstances;
- Withdraw your consent to the processing of your or participant Virtual Program Data . The withdrawal does not affect the lawfulness of processing based on your consent before its withdrawal.
- Know whether your or your Virtual Program 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 with a supervisory authority.

UC may be obligated to retain virtual Program 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.

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://aquarium.ucsd.edu/>. Treatment of information we collect now is subject to the version of the Privacy Policy in effect at the time such information is used. In addition, changes to how we treat participant's information will be communicated to you directly.

Contacting Us

If you have any general questions about how your personal information is used by the Birch Aquarium or wish to exercise any of your rights, please contact the Education team by email at birchaquariumprogram@ucsd.edu or call us at 858-534-7336 or contact the UC San Diego Privacy Officer at UCSDPrivacy@ucsd.edu.

Effective Date

This policy is effective as of 8/31/2020.