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| **Source:** | Policy Committee |
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| **Abstract** | NSDL is committed to respecting the privacy of those who choose to visit the NSDL Main Portal and those portals and services directly under the authority of NSDL Library Services and Operations.  This commitment extends to personally identifiable information of those who subscribe to, or register for, NSDL information, services, activities, or events through NSDL sites. |
| **See also** | Identifier: Privacy_Draft_4D.pdf<br>Title: Decision on PC-4: NSDL Privacy Policy<br>URL: http://comm.nsdlib.org/projects/policy/document/Privacy_Draft_4D/en/1/ Privacy_Draft_4D.pdf |

Table of Contents:

**1.0  Introduction**

    **1.1**  This policy covers the privacy practices of the NSDL Main Portal and those portals and services directly under the authority of NSDL Library Services and Operations (hereafter NSDL sites).  While NSDL reserves the right to do so in the future, the policy currently does not cover base privacy requirements that might be placed on third parties as a prerequisite for participation as a

collection represented in NSDL or providing services based on NSDL resources.

**1.2** NSDL is committed to respecting the privacy of those who choose to visit NSDL sites. This commitment extends to personally identifiable information of those who subscribe to, or register through NSDL sites for, NSDL information, services, activities, or events.

**1.3** NSDL sites provide links to other web sites. When users leave NSDL sites, they will be going to sites that are beyond the control of NSDL Library Services and Operations. These other sites may send their own cookies to users, collect data, or solicit personally identifiable information. The privacy policies and procedures described here for NSDL sites do not apply to any external links. NSDL encourages users to read the privacy policies of any site to which they link from an NSDL site, especially if the user shares any personal identifiable information with such a site.

**1.4** NSDL will disclose a user's personally identifiable information when required to do so by law or in the good-faith belief that such action is necessary to conform to the edicts of the law or to comply with legal processes served to the user, NSDL, or the NSDL site.

## 2.0 Definitions

**2.1** *NSDL Library Services and Operations.* The day-to-day operational aspects of the central parts of the NSDL, including designated NSDL portals and production services that are provided to users. These components may be provided by the Core Integration team, their subcontractors, or other designated service providers.

**2.2** *Personally Identifiable Information.* 'Personally identifiable information' is information provided voluntarily by a user of a web site as part of signing up for a particular service, activity or event, or in requesting information from the web site. 'Personally identifiable information' includes, but is not limited to, the user's first and last names, email address, a home or physical address, a telephone number, institution or affiliation, grade and school.

**2.3** *Non-personal Information.* 'Non-personal information' is all information about a user that is not personally identifiable information and includes, but is not limited to, the following:

    **2.3.1** The *Internet domain* (IP numbers and domain names) of the user's Internet services.

    **2.3.2** The *type of browser* that the user is using.

    **2.3.3** The *type of operating system* that the user is using.

**2.3.4** The *date and time* of the user's visit to the web site and the *web pages that the user visits* on the site.

**2.3.5** The *address of the previous web site* the user visited if the user links to one web site from another.

**2.3.6** A *fictitious name* submitted as a username in the process of registering for web site services.

**2.4** *Third Parties.* Other than NSDL Library Services and Operations and its authorized agents, 'third parties' are all individuals and organizations regardless of membership or direct participation in the NSDL.

**2.5** *Cookies.* A 'cookie' is a small file that a web site transfers to the hard disk of a user's computer, usually to keep track of the user while he or she is connected to a web site.

**2.6** *Interactive Form.* An 'interactive form' is a web-based form used by web sites that allows a user to voluntary submit personally identifiable information.

**2.7** *Web Server Log.* A 'web server log' is an automatically generated text file that records select information during user sessions including all or part of the non-personal information identified in section 2.3

**2.8** *Distributing Information.* 'Distributing information' is the deliberate act of sharing either non-personal information or personally identifiable information about one or more users of NSDL sites.

**2.9** *Opt-In.* An explicit user exercise of an option offered to users by an NSDL site that unambiguously signifies the user's assent to the action proposed in the option.

**2.10** *NSDL Customization Services.* 'NSDL customization services' are those services that permit the user to customize the interface to NSDL sites. Such services do not require or collect personally identifiable information.

**2.11** *NSDL Personalization Services.* 'NSDL personalization services' are those services that permit a user to maintain content on NSDL sites that may be publicly accessible through the NSDL sites by permission of the user. While such services do not require personally identifiable information, such information may be included in the content by its creator.

## 3.0 Uses of Non-Personal User Information

**3.1** NSDL Library Services and Operations uses non-personal information collected for statistical analysis, to help it make the NSDL sites more useful

to visitors.  Such information is automatically collected in web server logs by the web site's operating system and stored for subsequent analysis.  The NSDL web tracking system does not record personally identifiable information.

**3.2**  Information gathered for statistical analysis by NSDL Library Services and Operations will not be retained longer than is necessary for the completion of the analysis for which the information was collected.

### 4.0  Uses of Personally Identifiable In formation

**4.1**  At this time, NSDL Library Services and Operations does not collect personally identifiable information other than user email addresses for purposes stated in sections 4.4 through 4.5 of this policy.  NSDL reserves the right to collect additional personally identifiable information in the future. NSDL will provide explicit user opt-in mechanisms before beginning any such collection of personally identifiable information.

**4.2**  A personal email message from a user to NSDL will usually contain the return email address of the user.  If the user includes other personally identifiable information in email because he or she wants to address issues specific to his or her situation, such information may be used in responding to the email.

**4.3**  Personally identifiable information will not be accessible to personnel of NSDL Library Services and Operations other than those involved in the delivery of services for which the personally identifiable information was acquired.

**4.4**  Email addresses of users registered for NSDL special services are used for verification and to allow the retrieval of lost passwords for user account maintenance.

**4.5**  Distribution of a user's email address to a third party may occur when the user explicitly exercises an opt-in option approving such a distribution.

**4.6**  NSDL Library Services and Operations reserves the right to purge personally identifiable information in inactive registration accounts.

**4.7**  If a user participating in a NSDL web discussion forum supplies his or her name, email address, or other personally identifiable information, that information may be posted along with the user's comment.

**4.8**  Users of the NSDL personalization services may elect to share all or any part of their personally identifiable information as part of select services.  Upon such an election, users will be warned that the public sharing of their content

will include the sharing of personally identifiable information included in that content.

## 5.0  Use of Cookies

**5.1** On certain NSDL web pages, cookies may be used to help the user use the NSDL site interactively.  The cookies do not collect personally identifiable information about the user but only information about the browser session including non-personal information identified in section 2.3 of this policy.

## 6.0  Children's Guidelines

**6.1** Children are advised to consult with their parents or teachers before registering for any service on an NSDL site.

**6.2** In the future, NSDL Library Services and Operations or its agents may provide services either directed at children grades K-12, or when children are expected to be among the users.  In providing such services, children may be asked to provide personally identifiable information for use solely to enable participation in these activities and will not distributed to third parties.