ACTRIMS Privacy Policy

Last Modified: July 1, 2019

Americas Committee for Treatment and Research in Multiple Sclerosis ("ACTRIMS," "we," or "us") strongly believes in protecting your privacy and personal data. The purpose of the ACTRIMS website is to provide tools for collaboration through the flow of information between ACTRIMS, its partners, its participants and visitors to our site. This Privacy Policy describes the types of information ACTRIMS may collect from you or that you may provide when you visit our website, www.actrims.org or its associated pages, however accessed (the "Site") and our practices for collecting, using, maintaining, and disclosing that information.

By accessing or using our Site, you acknowledge and agree to the privacy practices set forth in this Privacy Policy.

How to Contact Us Regarding this Notice

If you have questions or concerns about this Notice, please contact us using the <u>Contact Us</u> section on our Site.

If you prefer, you may also contact us by phone at 608.310.8960, or by sending an email to info@actrims.org or by mail to 1818 Parmenter Street, Middleton, WI 53562.

Collection of Your Information

We collect several different types of information for various purposes to provide and improve our products and services and this Site to you.

Personal Information That We Collect

The information we collect varies depending on the type of activity you are performing on our Site. Much of the Site can be accessed without providing any personal information. In all instances where we collect personal information through the Site, we specifically indicate what information is required in order to provide you with the product or service you have requested. We collect several types of personal information from and about you when you use our Site. The personal information we collect may include:

Contact Information, including name, address, email address, and telephone number

Other Information That We Collect from You

Each time you visit <u>www.actrims.org</u>, we will automatically collect the following information, which does not necessarily identify you individually:

- Technical Information: This includes the Internet Protocol (IP Address) used to connect your device to the internet, browser type and version, time zone, browser plugin types and versions, operating system and platform.
- **Information Specific to Your Visit:** This includes pages your visit and searched for, page response times, length of visits to specific pages, click, links and mouse-overs, and the path you take from one page to another.
- **Browsing Information:** We also collect information that is sent to us automatically by your web browser and we use this information to generate statistics and analytics about

- our visitors to our Site. We may use this information to provide a better online experience with site improvements, providing better customer service, or use it as market research based on our visitor's actions.
- Cookies: ACTRIMS uses cookies (a small text file sent by your computer each time you visit this site) on our site to collect and store traffic data. Many browsers default to accepting cookies, however you may be able to change this setting in your browser, and you can also clear your cookies. However, if you select this setting you may be unable to access certain parts of our Site. 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 Site. Our Site uses cookies for Site administration and personalization, authentication, completing your requests, and analysis of page and Site information that does not personally identify individuals. For more information on how we use Cookies and how to manage Cookies, see our Cookie Policy.

Personal Information We Collect from Others

There is a possibility that we may obtain information about you from third-parties or publicly available databases. We will obtain your consent before doing so if required by law of the country in which you are located.

How We Use Your Information

We may use your information and/or personal data to provide you with our services, process transactions, provide and improve our customer service to you, contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving communications from us by following the unsubscribe link or instructions provided in any email we send or by contacting us. Examples of how we may use your information are below:

- To fulfill our obligations arising from your participation in ACTRIMS, or related events, or any other contract entered into between you and ACTIMS and to provide you with the services that you request from us.
- To organize events that you have registered for, and to provide you with information relating to the content of the event, including speakers, sponsors and other attendees.
- To provide any outgoing publications, newsletters, and event emails you have requested or that may be of interest to you.
- To respond to any requests you have
- To provide you information about upcoming events, offers, products and services we
 offer that are similar to those that you have participated in, with the exception of those
 that you have opted-out of.
- To notify you of any changes to our services.
- To provide and maintain our Site.
- To gather analysis of valuable information so that we can improve our Site.
- To monitor usage of our site.
- To detect, prevent, and address technical issues or investigate security concerns, including fraud.
- To comply with applicable laws, regulations, or industry requirements.

• To fulfill any other purpose for which you provide it or consent.

How We Share Personal Information

We may share your data in order to deliver our products or services and/or to enhance your customer experience. Below are examples of how we share your information:

- In order to serve you as a member or participant of ACTRIMS
- With third parties who perform functions on our behalf, including support service providers, such as Site hosting, marketing analysis, email and postal delivery, analytics services or other function.
- With analytics and search engine providers that assist us in the improvement and optimization of our site
- With Third-parties and individuals that help us improve the Site including, but not limited to, data storage, database management, web analytics and payment processing.
- We may share information with third parties if you give us consent or permission to share the information.
- We may share information in accordance with a business transaction. If we engage in a merger, acquisition, bankruptcy, dissolution, reorganization, other business transaction, we may share information subject to confidentiality arrangements.
- We may share information to prevent, detect, or investigate security concerns, including fraud.
- We may share information to comply with applicable laws, regulations, or industry requirements.
- We may share your information with law enforcement if required by law or in order to prevent fraud or other potential wrongdoing.
- We do not share your personal information with third parties for their direct marketing purposes.

We will only share your personal information with third-parties who provide us with adequate guarantees and processes that ensure the safe handling of your personal information.

Security

Although we use security measures to help ensure the protection of your Personal Information, no method of transmission over the internet or electronic storage is 100% secure. While your information is stored on secure servers and any payment transactions will be encrypted using SSL Technology, we cannot guarantee its absolute security.

Leaving Our Site And/Or Linking To Third Parties

Because our Site is secure, your browser URL will inform you if you are leaving a secured portion of the Site. We strive to ensure that any information you send us is safe. When you leave this Site and go to another linked site, we are not responsible for the content or availability of the linked site. Please be advised that we do not represent either the third party or you, if you enter into a transaction on the third party site. Further, the privacy and security policies of the linked site may differ from those practiced by us.

Do Not Track

Third parties may collect information about you across different websites, including our Site. We do not currently utilize the capability to respond to web browser do not track signals or other mechanisms that provide you with the ability to exercise choice regarding the collection of this information

For Users in the European Economic Area

If you are located in the European Economic Area (EEA), we provide you the following information and notification of rights in accordance with the European Union's General Data Protection Regulation ("GDPR").

Data Controller

ACTRIMS obtains and processes personal information in different capacities. When you provide us with your information through our Site to purchase products, obtain information, subscribe to emails or newsletters, or otherwise communicate with us, we serve as a data controller. When we act as a data controller, we determine how Personal Data, as defined by the GDPR, will be utilized in accordance with this Privacy Policy.

Legal Basis for Processing Personal Data

ACTRIMS' legal basis for collecting and using the personal information described in this Privacy Policy depends on the personal data we collect and the specific context in which we collect it. ACTRIMS may process your Personal Data because:

- We need to perform a contract or transaction with you
- You have given us permission to do so
- The processing is in our legitimate interests and is not overridden by your rights
- To comply with the law

Your Data Protection Rights

- If you are a resident of the European Economic Area, you have certain data protection rights. ACTRIMS aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data. If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us. In certain circumstances, you have the following data protection rights:
- Request access to your Personal Data. You may request access to any Personal Data we
 hold about you as well as related information, including the purposes for processing the
 Personal Data the period for which the Personal Data will be stored, the source of the
 Personal Data.
- Request correction of your Personal Data. You may have the right to obtain without undue delay the rectification of any inaccurate or incomplete Personal Data we hold about you.
- Request erasure of your Personal Data. You may have the right to request that Personal Data held about you is deleted. If you ever wish to correct or remove any personal information from our records, you may do so by contacting info@actrims.org.
- Also, if you wish to opt-out, please click here.

- Object to processing of your Personal Data. You may have the right to object to our
 processing of your Personal Data where we are processing your personal data based on
 our legitimate interests and we cannot demonstrate compelling grounds to continue such
 processing or for our direct marketing.
- Request restriction of processing your Personal Data Request. You have the right to request that we restrict the processing of your personal information:
 - During the pending period of time where we verify the accuracy of any personal data that you claim is inaccurate
 - Where the processing of your personal data is unlawful but you oppose erasure and instead request that we restrict the use of your personal data
 - If we no longer need your personal data but it is required for you to make or defend legal claims
 - During the pending period of time where we verify our legitimate interest to process your data when you object to such processing
- Right to Data Portability. Where we process your personal data by automated means that you have provided to us based on consent or through contract, you have the right to be provided with a copy of the information we have on you in a structured, machine readable and commonly used format.
- **Withdraw your consent.** You have the right to withdraw your consent at any time where ACTRIMS relied on your consent to process your personal information.

You also have the right to make a complaint to an EU Data Protection Authority if you believe that ACTRIMS has not complied with its obligations under this Notice or European law.

Retention of Data

ACTRIMS will retain your personal data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your personal data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. ACTRIMS will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

FOR USERS IN SWITZERLAND OR THE EUROPEAN UNION OR OTHER LOCATIONS OUTSIDE THE UNITED STATES INTERNATIONAL TRANSFER OF INFORMATION COLLECTED

ACTRIMS stores personal information in the United States. If you provide us information, it will be transferred to and accessed in the United States. This Privacy Policy shall apply even if ACTRIMS transfers personal information from non-United States countries to other countries.

YOU AGREE THAT THE INFORMATION YOU PROVIDE AND SUBMIT VIA THE SITE IS BEING SENT TO THE UNITED STATES OF AMERICA. YOU ARE INFORMED THAT THE UNITED STATES PRESENTLY DOES NOT HAVE AN ADEQUATE LEVEL OF PERSONAL DATA PROTECTION AS DETERMINED BY THE EUROPEAN COMMISSION'S ADEQUACY DECISION ON OCTOBER 6, 2015 (Case C-362/14) AND ARTICULATED IN THE EUROPEAN

UNION'S GENERAL DATA PROTECTION REGULATION AND HAS NOT RECEIVED A SIMILAR DESIGNATION OF ADEQUACY BY ANY OTHER FOREIGN DATA PROTECTION AUTHORITY. YOU AGREE TO THE TRANSFER OF YOUR DATA AND PERSONAL INFORMATION TO THE UNITED STATES, HOWEVER, TO BE USED IN ACCORDANCE WITH THIS PRIVACY POLICY.

Changes to This Notice

This Privacy Policy may change from time to time. Your continued use of this Site after we make changes is deemed to be acceptance of those changes, so please check the policy periodically for updates. We will post any changes we make to our Privacy Policy on this page with a notice that the Privacy Policy has been modified on the Site home page. The date the Privacy Policy was last modified is identified at the top of the page.