

# **Privacy Policy**

This notice discloses the privacy practices for the American Society for Clinical Pathology ("ASCP"). Any questions regarding this policy and our privacy practices should be sent to <u>privacy@ascp.org</u>.

This privacy policy will notify you of the following:

- What personally identifiable information is collected from you and how it is used;
- With whom your information may be shared;
- The security and retention procedures in place to protect your information;
- How you can correct inaccuracies in the information; and
- What choices are available to you regarding the use of your data.

#### **Changes to the Privacy Policy for the Site**

We reserve the right to update the Privacy Policy. We will post a notice that the Privacy Policy has been updated by revising the "Last Updated" date at the bottom of this page.

#### What Information We collect and How We Use It

We make sure that our use of your personal information falls under one or more lawful grounds, including for the performance of a contract, to meet legal obligations, for legitimate business interests or in some instances, with your prior consent.

We collect information when you:

- Become a registered user of the ASCP Website;
- Become a member of ASCP;
- Apply for certification by the ASCP Board of Certification;
- Register for or attend an ASCP event;
- Obtain online education from ASCP;
- Order or purchase products or services from ASCP;
- Volunteer to participate in ASCP activities and programs;
- Submit content for an ASCP publication or event;
- Make a donation to the ASCP Foundation; and,
- Use ASCP websites, mobile apps and other digital platforms, including our mentorship platform.

#### Information We collect.

When you browse but do not otherwise interact with the Site, you browse anonymously. In that event, we will not collect personally identifiable information--such as your name, address, phone number and email address--as you browse.

To access certain options and services, however, we may ask you to become a registered user and provide certain personally identifiable information and without providing that information, you may be unable to access certain Site options. This personal



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information may include name, address, phone number, birth date, email address, and other demographic information. We do not collect Social Security numbers. For a listing of the exact type of personal information that will be collected from you if you decide to become a registered user, please review the registration form at the Site. We may use this information to, e.g., send you a welcoming email, to verify your username and password or to provide website updates, and to better understand your needs and how we can improve the Site. In addition, we may use the information for analytics purposes (e.g., evaluating site usage patterns, assessing throughput) so that we can gauge the effectiveness of our program and improve the usefulness of the information on the Site.

We may ask for sensitive personal information such as gender, race or ethnicity. These will always be optional data and you will not be required to provide that information to become a member of ASCP. This information helps us understand the diversity of our membership and the profession and is important for us to advance the profession of Pathology and Laboratory Medicine.

# Tracking activity on the Site.

When you visit or interact with our Site, services, applications, tools or messaging, we or our authorized service providers may use cookies, web beacons, and other similar technologies for storing information to help provide you with a better, faster, and safer experience and for advertising purposes. We may use third parties to serve advertisements on other websites that may be of interest to you, based on information collected about your use of our Site and other websites. To do this, these companies may place or recognize a unique cookie on your browser (including the use of pixel tags and web beacons, as discussed below).

A cookie is a small piece of information which is sent to your browser and stays on your computer or mobile device when you visit our Site. Cookies allow us to remember you when you visit the Site and serve advertising to you about ASCP or other relevant products and services on or after you have left the Site. Two types of cookies are commonly used. A session cookie is created by a website when that website is accessed; that type of cookie is automatically deleted by closing the Web browser. A persistent cookie is a cookie that is stored on the hard drive of the user's computer for a period of time chosen by the website that set the cookie, usually for a number of years, unless the user deletes it manually. This Privacy Policy distinguishes between short-lived cookies and long-lasting cookies. Short-lived cookies include all session cookies and those persistent cookies that are set to be stored for no more than one week. The Site may at times require users to accept short-lived cookies for the Site to function properly. Long-lasting cookies may be used on the Site to track visitor practices, help determine which Site features are most important, and guide editorial direction. Other long-lasting cookies may make it possible for the user to access the Site without requiring entry of a user name or password, allow the user to view different restricted areas of the site without re-registering, allow the user to personalize the Site for future use, and provide other features and benefits. Users who do not desire the functionality created by the long-lasting cookie can disable the long-lasting cookie function by disabling the long-lasting cookie function on their Web browser.

Cookies are required to access protected sections of the Site. Cookies are essential for Site administration and security. Another way we track Site activity is by using transparent electronic images called "clear GIFs," "Web bugs," or "Web beacons" on the Site's pages. These images count the number of users who visit that page from outside the Site or through email links. We do not use any of these electronic images to collect personally identifiable information. If, however, you have provided us with personally identifiable information, e.g., through a registration, we may associate this personally identifiable information with information gathered through these tracking technologies. This may allow Us to offer increased personalization and functionality.

#### Authorized third-parties who may use cookies and similar technologies in this fashion include:

- Google Analytics Cookie: This web analytics service uses cookies and similar technologies to analyze how users use a website, compile statistical reports on website activity, and provide other services related to the Site and internet use. For more information, or to opt out of Google Analytics, please go to: <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>.
- Google AdWords Remarketing Cookie: This remarketing advertising services uses cookies to help us deliver targeted online ads



based on past visits to our Site. This service allows us to tailor our marketing to better suit your needs and only display ads that are relevant to you. You may opt out of Google's use of cookies by visiting Google's Ads Settings.

- Facebook Pixel: This analytics tool allows us to measure the effectiveness of our advertising by understanding the actions you take on our Site. It allows us to tailor our marketing to better suit your needs and only display ads that are relevant to you. You can opt out of the use of Facebook Pixel by visiting the Ads tab in your Facebook profile settings.
- Hotjar Tracking Cookies: This technology services helps us better understand and therefore optimize our users' experience. Hotjar uses cookies and other technologies to collect data on user behaviors and devices, which is then stored in a pseudonymized user profile. Neither Hotjar nor we will ever use to this information to identify individual users or to match it with further data on an individual user. You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our Site, and Hotjar's use of tracking cookies on other websites by following this opt-out link: <a href="https://www.hotjar.com/legal/compliance/opt-out/">https://www.hotjar.com/legal/compliance/opt-out/</a>

# How We use log files and aggregate information.

We may track the total number of visitors to the Site, the number of visitors to each page of the Site, IP addresses, and the domain names of our users' Internet Service Providers, and we may analyze these data for trends and statistics in the aggregate, but such information will be in aggregate form only and it will not contain personally identifiable data. Such aggregate information is not linked to any personally identifiable information. We may use aggregate information to analyze trends, administer the Site, track user movement, and gather broad demographic information for aggregate use. We may share this aggregate information with our partners and contracted vendors to assist us in operating the Site and to enable them to better understand our business.

#### How We use personal information.

Once collected, we may pass your information to our third-party service providers, agents, subcontractors, and other associated organizations for the purposes of completing tasks and providing services to you on your behalf (for example to process applications, to process donations, and to send you mailings). However, when we use third-party service providers, we disclose only the personal information that is necessary to deliver the applicable service and we have a contract in place that requires them to keep your information secure and not to use it for their own direct marketing purposes.

We may use personal information to send transactional or relational messages to those users with whom we already have a relationship.

We may use your personal information to communicate with you regarding ASCP educational products that may be of interest to you unless you opt out of this program. You may do so by logging into your account and choosing the "Profiles and Settings" option, which will take you to the "Privacy" "Communications" tabs to choose your email preferences.

When we send email to you, we may be able to identify information about your email address, such as whether you can view graphic-rich HTML email. If your email address is HTML-enabled, we may choose to send you graphic-rich HTML email messages.

These email messages may contain "clear GIFs" or "Web beacons" to measure the offer's effectiveness so we know how to serve you better. We do not collect personally identifiable information through "clear GIFs" or "Web beacons."

# You may opt out of email by logging into your account at the Site and choosing the "Profiles and Settings" option, which will take you to the "Privacy" "Communications" tabs to choose your email preferences.

We may lease email and primary mailing address information of ASCP members to third-parties who wish to promote CME programs or other products to our members. Members are provided the opportunity to opt out through the unsubscribe options included at the bottom of any email sent through this program. Members can also opt out of this program by logging into their account



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and choosing the "Profiles and Settings" option, which will take them to the "Privacy" tab, where they can choose their privacy preferences.

We share contact information for persons who attend the ASCP Annual Meeting with ASCP industry and other organizational supporters. You can opt out of this program during the registration process. In addition, members can opt out of this program by logging into their account and choosing the "Profiles and Settings" options, which will take them to the "Privacy" tab, where they can choose their privacy preferences.

We may disclose your personal information if required to do so by law or in the good-faith belief that such action is necessary to: (a) conform to legal requirements or comply with legal process; (b) protect and defend our rights or property; (c) protect the personal safety of Our personnel or members of the public in urgent circumstances.

Links to third party sites. The Site may contain links to other websites that are not under our control or maintained by us. Such links do not constitute an endorsement by us of those other websites, their content, or the persons or entities associated with them. You acknowledge that we are only providing these links to you as a convenience, and you agree that we are not responsible for the content of such websites. Your use of these other linked websites is subject to the terms of use and privacy policies located on the linked websites, which may differ from this Privacy Policy. To ensure your privacy is protected, we recommend that you review the privacy statements of other sites you visit.

**Children under 13.** The Site is not intended for or designed to attract children under the age of 13. We do not knowingly solicit data online from or market online to children under the age of 13. In addition, we do not knowingly collect any personally identifiable information from anyone under the age of 18 without the consent of a parent or guardian, and you must be 18 years of age or older to submit registration information. Should you believe that a minor of whom you are a parent or guardian has registered, please contact us at privacy@ascp.org and we will make reasonable efforts to remove all personally identifiable information related to a minor.

# How We Retain and Safeguard Information - Site Security Features

**Retention.** We are legally required to hold some types of information to fulfill our statutory obligations. We will hold your personal information in our systems for as long as is necessary for the relevant activity, for our legitimate business purposes or as is set out in any relevant contract you hold with us.

**Information security.** We implement security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data. We restrict access to personal information to our business partners who may need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination, if they fail to meet these obligations.

**SSL technology and how you benefit from it.** We realize the importance of security, so we've taken a number of steps to enhance the protection of information sent to or from the Site over the Internet. First, we require that a "secure session" be established, using Secure Socket Layer (SSL) technology. This is done any time you supply or access information in one of our secure online areas. SSL technology creates a private conversation that only your computer and the Site systems can understand. The SLL technology encodes information as it is being sent over the Internet between your computer and the Site, helping to ensure that the transmitted information remains confidential.

**User ID and password.** Certain areas of the Site require the use of a user ID and password as an additional security measure that helps protect your information. This allows us to verify who you are, thereby allowing you access to premium features and preventing unauthorized access. You are responsible for keeping this password confidential. We ask you not to share your password with anyone.



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When you have finished using a secure area of the Site, make sure you always click on the "Log Out" link which appears on every secure page. When you click on the "Log Out" link, you will be given the option to end your secure session. No further secure transactions can be conducted without re-entering your user ID and password. You should be aware that browser software often "caches" a page as you look at it, meaning that some pages are saved in your computer's temporary memory. Therefore, you may find that clicking on your "Back" button shows you a saved version of a previously viewed page. Caching in no way affects the security of your confidential user ID or password.

**No guarantee.** Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. Accordingly, while we strive to protect your personal information, we cannot guarantee or warrant the security of any information you transmit to us, or to or from the Site. Once we receive your information, we make our best effort to ensure its security on our systems and when we transmit to one of our third-party providers.

# How You Can Access and Change Information

We are committed to respecting your right to access and correct your personal information. If you are a registered user of the Site, subscriber to ASCP publications, purchaser of ASCP products or an ASCP member, you may review and update your information by using your user name and password or by contacting ASCP Customer Service at (800) 267-2727 or online at <u>ASCP.org</u>. If you have any questions about this online Privacy Policy or the information practices at the Site, you may contact us by email at privacy@ascp.org. Updates or corrections to certain types of information (e.g., physician licensure, ASCP certification, continuing medical education) may require independent verification prior to making any permanent change to our records.

# **Right to Be Forgotten**

For residents of the European Union, under the GDPR regulations, you can request to be forgotten. Due to the complex nature of the systems that can hold your personal information, we may choose to accomplish this by anonymizing some of your personal information such as name, address, and email, but retain the records of your activity. As the Data Controller, we will also pass this request along to the third-parties with which we have a Data Processing Agreement and request that they honor your right to be forgotten.

This action is permanent and cannot be undone. If you later change your mind, you would be required to create another account which could make it difficult to see a complete history of your activities, impacting your ability to receive some benefits. To be forgotten, make your request to: privacy@ascp.org.

Some personal information may need to be retained for legitimate interests or contractual or statutory obligations.

# **Right to Object**

For residents of the European Union, under the GDPR regulations, you have the right to object to the processing of your personal data. You may submit such requests to: privacy@ascp.org.

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