

# Privacy Policy for IJCAHPO Websites

(Updated January 24, 2024)

This Privacy Policy explains how the International Joint Commission on Allied Health Personnel in Ophthalmology uses the personal data we collect from you when you use our websites and our site services.

In this Privacy Policy:

- the International Joint Commission on Allied Health Personnel in Ophthalmology is referred to as "IJCAHPO", "us" or "we".
- the term "Sites" is used to collectively identify our websites which include: <u>www.jcahpo.org</u>, <u>www.eyecarece.org</u>, <u>www.actioned.org</u>, <u>www.myeyecareer.org</u>, <u>www.myjcahpoce.org</u>, <u>store.jcahpo.org</u>, and <u>public.jcahpo.org</u>.
- The term "Site Services" refer to all services available on the Sites such as online courses, newsletters, electronic publications, and other site-based features.

IJCAHPO created this Policy to respect your privacy and provide you with transparent information about how your privacy may be affected by using the Sites and Site Services. Please keep in mind that your use of the Sites and the Site Services is contingent upon your acceptance of, and adherence to, IJCAHPO's Terms of Use, <u>which are accessible here</u>. If you do not agree to the Terms of Use, then you are not authorized to use any of the Sites or Site Services.

#### What data do we collect?

IJCAHPO collects the following data:

- Personal identification information including:
  - Your name,
  - Your physical address,
  - Your telephone number,
  - Your fax number,
  - Your e-mail address,
  - Your place of employment
  - Your birthdate
  - Images and photographs you upload,
  - Each username assigned to you,
  - Each password assigned to you,
- Your credit card number or other payment information, (we do not "store" it),
- Registration information related to:
  - Your accounts with us,
  - Your accounts with others that is supplied to us,
  - The educations programs, webinars and courses in which you enroll,
  - Credits you receive related to such educational programs, webinars and courses,



- The exams and quizzes you take,
- Your exam and quiz results,
- Attendance and participation records related to educational programs, webinars and courses
- Information related to certifications for which you apply,
- Information related for certifications you receive,
- Information related to subscriptions you purchase or otherwise receive,
- Information related to other products or services you purchase or otherwise receive,
- Information related to your participation in committees and programs,
- Information related to your participation in other activities with IJCAHPO,
- Information you supply in response to any survey or evaluation,
- Information you supply when you contact us with a question or concern,
- Information about your use of our websites including:
- The number of times you visit our websites,
- The dates and times you visit our websites,
- Your language,
- The type of browser and operating system you use,
- Your Internet service provider,
- Your Internet protocol (IP) address,
- The website(s) from which you arrived at our websites.

The Personal Information we collect related to you depends on how you use our websites. IJCAHPO does not collect social security numbers of users. To the extent IJCAHPO comes into possession of users' social security numbers or collects such information in the future, the information will be treated confidentially and not shared with third-parties unless allowed by law. Additionally, IJCAHPO will take reasonable steps to limit the access to the social security numbers and take legally required steps of securing the transmission of the data.

#### How do we collect your data?

You directly provide IJCAHPO with most of the data we collect. We collect data and process data when you:

- Register online or place an order for any of our products or services,
- Voluntarily complete a customer survey or provide feedback on any of our websites or via email,
- Use or view our websites via your browser's cookies,
- Use or view our websites via log files and clear gifs (commonly known as "web beacons"),
- Upload photographs, images and other data,
- Call our office for assistance with technical or certification issues,
- Engage our support team via email or online chat,

We may also receive your data from third parties including:

- Credit card companies and other financial organizations you employ when you engage in financial transactions with us, and
- Third parties to assist us in fulfilling orders and providing services to you.

### How will we use your data?

IJCAHPO collects your data so that we can:

- Fulfill requests for products, services, or information,
- Track and confirm online orders,
- Communicate exam and test results,
- Provide customer services,
- Administer programs, promotions or surveys,
- Offer new products and services,
- Improve the effectiveness of our websites, our marketing endeavors and our services,
- Conduct research and analysis,
- Send marketing communications,
- Perform other business activities,
- Process your registrations, subscriptions, and orders,
- Manage your account,
- Deliver educational programs,
- Track and report the credits you receive,
- Administer exams,
- Track and report performance on exams,
- Administer our certification programs,
- Track and report certifications granted,
- Provide administrative support for committees we sponsor,
- Provide administrative support for other programs,
- Email you with special offers on other products and services we think might interest you,
- Any other purposes that we deem appropriate for enhancing, improving, or analyzing websites.

Images and photographs you upload are used for a variety of purposes, including but not limited to, display on registration webpages and mobile applications. By way of example, if you volunteer to give a lecture or teach a course for us, we may display your photograph in our mobile app (and/or our registration website) along with your name, course title, and description. By uploading images and photographs you grant to IJCAHPO the right to edit the images and photographs, and the right to use, publish and distribute the images and photographs, in either the original uploaded form or as edited, in any and all manner and media now known or hereafter devised, throughout the world, in perpetuity. By uploading images and photographs you represent and warrant that you have the right to grant the rights granted hereunder, and that no one else possesses any rights, including without limitation copyrights, that would be infringed by IJCAHPO's editing, use, publication and distribution of the images and photographs uploaded by you. You understand that IJCAHPO shall have full editorial control over the materials it publishes comprising any images or photographs uploaded by you. You shall have no right of approval, no claim for compensation now or in the future, and no claim (including, without limitation, claims based upon invasion of privacy, defamation, or right of publicity) arising out of or in connection with, any use or alteration of the images and photographs you upload in materials IJCAHPO elects to publish. You further acknowledge that some or all of the images and photographs you upload may not be used by IJCAHPO, and the images and photographs, and portions thereof, may be combined with other content supplied by IJCAHPO and third parties. You expressly release IJCAHPO, its agents, employees, licensees and assigns from and against all claims which you have or may have in the future for invasion of privacy, defamation or any other cause of action arising out of the production, distribution, broadcast, transmission or exploitation of the images and photographs in IJCAHPO publications. You acknowledge and agree that in no event shall you seek or be entitled



to obtain injunctive or other equitable relief against IJCAHPO, its agents, employees, licensees, and assigns related to the use, publication or distribution of the images and photographs.

Your Personal Information, such as your name, course you registered for, and the purchasers of the services, may be shared with our business partners. These business partners assist in providing services to us or you, consistent with the courses and/or services you have signed up for and/or purchased. IJCAHPO will never sell your information to third parties. IJCAHPO will share your data with our partner organizations so that they may offer you their products and services or help us improve the Sites and the Site Services. These partner organizations include the JCAHPO Education and Research Foundation and International Council of Accreditation.

Payment information, such as your credit card details, is collected only to process a transaction and reasonable measures are taken to ensure your payment information is not vulnerable to theft or interception. When IJCAHPO processes your order, it may send your data to, and may also use the resulting information from, credit reference agencies to prevent fraudulent purchases.

We may utilize third parties to assist us in fulfilling orders and securing payment. Any such third parties will have access to certain Personal Information to perform their services. We reasonably limit the use of such Personal Information by these third parties only to the information necessary for the performance of such services. We take reasonable steps to obligate these third parties to handle information appropriately and confidentially.

When you complete a course, earn a credit, complete an exam, receive a certification, or are no longer certified, IJCAHPO will share your data with appropriate regulatory bodies and agencies.

IJCAHPO may make certain Personal Information available to law enforcement personnel and agencies, as required by law or to enforce IJCAHPO's Terms of Use. For example, IJCAHPO may disclose such information if required by law or a judicial or governmental order or subpoena, or if IJCAHPO believes the disclosure of such information is reasonably prudent. IJCAHPO may also disclose such information to law enforcement personnel and agencies, or use such information as part of legal process, to protect its property or interests, or in furtherance of an investigation regarding unauthorized access or any illegal activities.

When you contact IJCAHPO, we may ask for certain Personal Information such as your name, email address, or telephone number. We use this information primarily to personally identify you and to better communicate with you.

IJCAHPO may share your Personal Information to a third party if we determine that your contact information is of benefit to its members and/or their patients. If you do not want us to share your Personal Information with third parties, please submit your request in writing using the contact information listed on the bottom of this Policy. When we receive your request, we will take reasonable steps to limit the use and disclosure of your Personal Information. It will generally take ten (10) business days to process your request, so please be patient.

IJCAHPO wants your Personal Information to be accurate and complete. To update your Personal Information please contact us in writing as provided below.

#### How do we store your data?

IJCAHPO securely stores your data at a secure location. IJCAHPO will keep your Personal Information for so long as you are using any of our websites or services. After all such use of our websites or services has ended, IJCAHPO will keep your Personal Information or an additional period of 20 years. Once this time period has expired, we will delete your data as part of the routine maintenance of our systems.

# Marketing

IJCAHPO would like to send you information about products and services of ours that we think you might like, as well as those of our partner organizations. These partner organizations include:

- JCAHPO Education and Research Foundation
- International Council of Accreditation

By accessing any of the Sites or Site Service you have agreed to receive marketing information and materials from us. You have the right at any time to stop IJCAHPO from contacting you for marketing purposes or giving your data to our partner organizations.

If you no longer wish to be contacted for marketing purposes, please:

- 1. Sign in to your <u>IJCAHPO account</u>
- 2. Click the **Preferences** tab
- 3. Adjust Communication Preferences as desired
- 4. Click Save

It will generally take ten (10) business days to process your request, so please be patient.

# What are your data protection rights?

We may charge you reasonable fees for this service.

**The right to rectification** - You have the right to request that IJCAHPO correct any information you believe is inaccurate. You also have the right to request IJCAHPO to complete information you believe is incomplete.

**The right to erasure** - You have the right to request that IJCAHPO erase your personal data, under certain conditions.

**The right to restrict processing** - You have the right to request that IJCAHPO restrict the processing of your personal data, under certain conditions.

**The right to object to processing** - You have the right to object to IJCAHPO processing of your personal data, under certain conditions.

**The right to data portability** - You have the right to request that IJCAHPO transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us: <u>JCAHPO@JCAHPO.org</u>.

### What are cookies?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.



For further information, visit allaboutcookies.org.

#### How do we use cookies and tracking technologies?

When using our websites, IJCAHPO assigns your computer one or more cookies that enable us to improve the quality of our services and to personalize your experience. Cookies allow us to automatically collect information about your activity on our Sites and when using the Site Services, such as the content you access while on our websites, the links you click, and other activity you conduct while using our websites.

Our Site may contain web beacons (also known as "clear gifs") or similar technologies that gather non-personally identifiable information about your use of our websites. Such technology may also be contained in e-mail messages or newsletters from IJCAHPO that allow us to determine whether messages have been accessed. The purpose of our use of this technology is so that we may analyze the effectiveness of our marketing efforts, the quality of our websites, and the services we provide.

Our websites and some of our other electronic materials contain external links to other websites. These other websites may send their own cookies to users, collect data, or solicit Personal Information. IJCAHPO is not responsible for the privacy practices or the content of these other websites. IJCAHPO disclaims any responsibility for the privacy practices of third parties that may have links to or from our website, or any framed content within our websites. We encourage you to review the privacy policies/statements of every website that you visit that collects personally identifiable information.

#### What types of cookies do we use?

There are different types of cookies. Our websites may use two types: functionality cookies and advertising cookies. Functionality cookies allow IJCAHPO to recognize you on our website and remember your language, location, and previously selected preferences. Advertising cookies allow IJCAHPO to collect information about use of our websites, the content you viewed, the links you followed and information about your browser, device, and your IP address. IJCAHPO sometimes shares some limited aspects of this data with third parties for advertising purposes. As such, when you visit another website, you may be shown advertising based on your use of our websites.

#### How to manage cookies

You may choose to modify your web browser's setting to disable cookies or limit their use. If you choose to disable or limit cookies, you are still able to access our websites, but you may be unable to use all the features of our websites.

#### Privacy policies of other websites

This Privacy Policy applies only to our websites. IJCAHPO's websites and some of our print and electronic materials contain external links to other websites. These other websites may send their own cookies to users, collect data, or solicit Personal Information. IJCAHPO is not responsible for the privacy practices or the content of these other websites. IJCAHPO disclaims any responsibility for the privacy practices of third parties that may have links to or from our website, or any framed content on our websites. We encourage you to review the privacy policies/statements of every website that you visit that collects personally identifiable information.

# **Changes to our Privacy Policy**

This Privacy Policy may occasionally be updated to reflect new features and services or new privacy practices. The latest version will be posted on our Sites. This policy was last updated January 24, 2024.

If you wish to retain a copy of this privacy policy, you should print a copy for your records. From most web browsers, this can be accomplished by selecting file and then "print" from the dropdown menu.

### **Notice to Minors**

IJCAHPO does not offer products or services for sale to those who are under the age of eighteen (18). If you are a minor, you may not purchase products or services from IJCAHPO. Likewise, IJCAHPO does not intend to receive any information from minors. Even though IJCAHPO does not seek to do business with or collect any information about minors, this Policy is still designed to comply with the Children's Online Privacy Protection Act ("COPPA") to the extent COPPA applies to IJCAHPO. Accordingly, IJCAHPO does not knowingly collect or retain any personal information about users under the age of thirteen (13). If we obtain actual knowledge that we collected or retained personal information about a child under the age of thirteen (13), that information will be promptly deleted from our database, servers, and all other media. Since we do not collect information from users under thirteen (13) years old, no such information should be disclosed to third parties.

# **Data Protection Officer**

You can contact our data protection officer as follows:

IJCAHPO Attn: Data Protection Officer 2025 Woodlane Drive St. Paul, MN 55125 JCAHPO@JCAHPO.org Phone: (651) 731-2944

# **Additional Terms**

In the unlikely event that IJCAHPO or substantially all the assets of IJCAHPO are acquired by a third party either in a bankruptcy, court proceeding or otherwise, it is possible that your Personal Information may be one of the assets transferred. In such an event, IJCAHPO would take reasonable steps to require the third party to maintain IJCAHPO's then-current privacy policies and practices, or alternatively, give written notice to you before the transfer of Personal Information is completed.

IJCAHPO is a private, non-for-profit organization based in Minnesota. All business transactions with IJCAHPO are deemed to occur in Minnesota and are subject to Minnesota law. IJCAHPO is not a financial institution or governmental entity required by law to adopt or publish this Policy. The adoption or publication of this Policy does not subject IJCAHPO to any stricter duty in its collection, handling, storage and disclosure of nonpublic information than otherwise applies to IJCAHPO under applicable law. IJCAHPO has created this Policy in good faith, using reasonably



diligent business practices; however, no person or entity shall have any right or recourse against IJCAHPO its affiliates, agents, sponsors, or other related parties based on any alleged violation or noncompliance with this Policy by IJCAHPO.

To the extent any terms of this Privacy Policy are held invalid and/or unenforceable by a court of law or a competent jurisdiction, the remaining provisions of the Policy shall remain in full force and effect.

#### How to contact us

If you have any questions about this Privacy Policy, the data IJCAHPO stores related to you, or you would like to exercise one of your data protection rights, please contact IJCAHPO at:

IJCAHPO Attn: Online Privacy Policy Inquiry 2025 Woodlane Drive St. Paul, MN 55125 IJCAHPO@JCAHPO.org Phone: (651) 731-2944 Fax: (651) 731-0410