



## **Privacy Policy for JCAHPO Websites**

(updated May 8, 2015)

This Privacy Policy outlines the policies and practices of the Joint Commission on Allied Health Personnel in Ophthalmology ("JCAHPO" "us" or "we") regarding the collection and use of your Personal Information (defined below) from your visit to any of our websites, which include: [www.jcahpo.org](http://www.jcahpo.org), [www.actioned.org](http://www.actioned.org), [www.myeyecareer.org](http://www.myeyecareer.org), and [www.myjcahpoce.org](http://www.myjcahpoce.org) (the "Site"). This Privacy Policy also relates to your usage of Site services, such as online courses, newsletters, electronic publications and other Site-based features.

JCAHPO created this Policy to respect your privacy and provide you with transparent information about how your privacy may be affected by using the Site. Any rights the law may provide you under this Policy is contingent upon your agreement and acceptance of, and adherence to, JCAHPO's Terms of Use, [which are accessible here](#). If you do not agree to the Terms of Use, then you are not authorized to use the Site.

### **1. Notice to Minors**

JCAHPO does not offer products or services for sale to those who are under the age of 18. If you are a minor, you may not purchase products or services from JCAHPO. Likewise, JCAHPO does not intend to receive any information from minors. Even though JCAHPO 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 JCAHPO. Accordingly, JCAHPO does not knowingly collect or retain any personal information about users under the age of 13. If we obtain actual knowledge that we collected or retained personal information about a child under the age of 13, that information will be promptly deleted from our database, servers, and all other media. Since we do not collect information from users under 13 years old, no such information should be disclosed to third-parties.

### **2. Changes to this Statement**

This Policy may occasionally be updated to reflect new features and services or new privacy practices. The latest version will be posted on our Site. This policy was last updated as of the date appearing at the end of this Policy.

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.

### 3. Collection and Use of Information

JCAHPO collects general information about the usage of this Site as well as information that you provide (“Personal Information”). The Personal Information we collect depends on how you use our Site. We use commercially-reasonable practices to refrain from distributing Personal Information except in a manner consistent with this Policy.

To monitor Site usage and improve the quality of our Site, we gather general information about the use of our Site. We use server logs and industry-standard Site statistics software to count the number of users who visit our Site, who view particular webpages in our Site, and to generally track other statistics about the Site usage. We may also collect and retain various data which may include things like your language, type of browser and operating system, Internet service provider, Internet protocol (IP) address, access time(s), and the website from which you arrived at the Site. At times, JCAHPO may share with third parties the aggregate information about overall usage of our Site and other Site services that we collect, in order to provide general information about our Site services, sell advertising, establish sponsorships or other business relationships, or in an effort to enhance or improve the Site.

When you order products, sign up for courses or seek our services, we collect Personal Information. For example, we may request and/or collect Personal Information when you:

- Register an account with JCAHPO online;
- Take an online course or exam;
- Purchase products or services;
- Participate in a committee, program or survey;
- Participate in other activities with JCAHPO; and/or
- Contact us with a question or concern.

The type of Personal Information we collect includes your name, address, telephone and fax numbers, e-mail address and credit card number or other payment information. The Personal Information you provide is encrypted to help ensure that your Personal Information is securely and safely transmitted. However, no one can give an absolute assurance that information intended to be maintained as private, whether transmitted via the Internet or otherwise, cannot be accessed inappropriately or unlawfully by third parties. While we have taken and will continue to take reasonable steps to ensure the secure and safe transmission of your Personal Information, we cannot guarantee the use of your computer, electronic resources, or network is secure.

We use the Personal Information you provide for following purposes:

- Delivering on-line courses or exams;
- Fulfilling requests for products, services or information;
- Tracking and confirming online orders;
- Communicating exam and test results;
- Providing customer services;
- Administering programs, promotions or surveys;
- Offering new products and services;
- Improving the effectiveness of our Sites, our marketing endeavors and our services;
- Conducting research and analysis;
- Sending marketing communications;
- Performing other business activities as needed, or as described elsewhere within this Policy; and
- Any other purposes that we deem appropriate for enhancing, improving, or analyzing the Site services.

Some or all of 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. JCAHPO will never sell your information to third-parties.

Payment information, such as your credit card details, is collected only to process a transaction and is stored in an encrypted format and reasonable measures are taken to ensure your payment information is not vulnerable to theft or interception. 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 in order 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.

JCAHPO may make certain Personal Information available law enforcement personnel and agencies, as required by law or in order to enforce JCAHPO's Terms of Use. For example, JCAHPO may disclose such information if required by law or a judicial or governmental order or subpoena, or if JCAHPO believes in its discretion the disclosure of such information is reasonably prudent. JCAHPO may also disclose such information to law enforcement personnel and agencies, or use such information as part of legal process, in order to protect its property or

interests, or in furtherance of an investigation regarding unauthorized access or any illegal activities.

When you contact JCAHPO, we may ask for certain Personal Information such as your name, e-mail address, telephone number or fax number. We use this information primarily to personally identify you and to better communicate with you. JCAHPO 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 10 business days to process your request, so please be patient.

We may use various technologies to collect information from your computer about your activities on our Site. We may collect and store non-personally identifying information through cookies, log files, clear gifs (commonly known as “web beacons”), and third-parties to profile user activity and preferences. Technical and specification information about your browser and computer is automatically collected when you use or visit the Site. As noted above, this information may include your Internet Protocol (“IP”) address, your browser type, operating system, access time(s), the content of previously accepted “cookies” from us, and the website address that referred you to our Site.

A cookie is data stored on your computer that tracks non-personal information about you. When using our Site, we may assign your computer one or more cookies that enable us to improve the quality of our Service and to personalize your experience. Cookies allow us to automatically collect information about your activity on our Site, such as the content you access while on our Site, the links you click, and other activity you conduct while using our Site. 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 Site, but you may be unable to use all of the features on our Site. Additional information about cookies may be found at: [www.microsoft.com/info/cookies.htm](http://www.microsoft.com/info/cookies.htm).

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 Site. Such technology may also be contained in e-mail messages or newsletters from us 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 Site, and the Services we provide.

In the unlikely event that JCAHPO or substantially all of the assets of JCAHPO 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, JCAHPO would take reasonable steps to require the third party to maintain JCAHPO’s then-current privacy policies and practices, or alternatively, give written notice to you before the transfer of Personal Information is completed.

#### **4. Opting Out of Receiving Promotional Materials.**

Unless you opt out of receiving promotional materials, we may send you information by e-mail or postal mail to the addresses you submit to us on the Site. Such information may include newsletters, communications relating to JCAHPO distant learning, seminars, announcements or other information that may interest you. If you do not want to receive promotional information or material from us, submit your request in writing using the contact information listed on the bottom of this page. When we receive your request, we will take reasonable steps to remove your name from our promotional lists. It will generally take 10 business days to process your request, so please be patient.

#### **5. Links to Other Sites**

The Site 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. JCAHPO is not responsible for the privacy practices or the content of these other websites. JCAHPO disclaims any responsibility for the privacy practices of third parties that may have links to or from our website, or any framed content on the Site. We encourage you to review the privacy policies/statements of every website that you visit that collects personally identifiable information.

#### **6. Security**

JCAHPO believes the security of your Personal Information should be a high priority. JCAHPO has implemented reasonable technology and security policies and procedures intended to reduce the risk of accidental destruction or loss, or the unauthorized disclosure of or access to such information, appropriate to the level of the data concerned. In the unlikely event that JCAHPO believes that the security of your Personal Information in JCAHPO's possession or control may have been compromised, JCAHPO may seek to notify you of that development consistent with applicable law. If a notification is appropriate or legally required, JCAHPO will endeavor to do so as promptly as possible under the circumstances, and, to the extent JCAHPO has your e-mail address, JCAHPO may notify you by e-mail.

JCAHPO may store your information for more than one (1) year from the time of initial submission, as well as automated personal information we collect about you.

This Policy is intended to cover collection of information on our Site from residents of the United States. The laws in other countries may or may not be as comprehensive as those in the United States. If you are a resident of another country or are visiting our Site from outside the United States, you acknowledge and agree that your information may be transferred to, stored, and processed in the United States where our servers are located and our central database is operated. Some data may also be stored and/or backed-up by our vendors at locations that are not disclosed to us, including locations that may be outside of the United States. By using our Site, you acknowledge and agree that your information may be transferred to our facilities and those

third parties with whom we share it as described in this Privacy Policy. If you are unwilling to accept these terms, then you agree that you will not use or access the Site or its services.

## **7. Privacy Rights and Online Tracking**

JCAHPO respects and honors your wishes as it relates to preferences for receiving communications both online and in the mail as well as participating in any list rental and exchange program. To opt out of receiving email communications, mail or from participating in any list rental and exchange program, or to request a disclosure of any list rental and exchange information, please contact us as provided below. Any request for Personal Information will be fulfilled within a reasonable time frame.

JCAHPO does not track its customers over time or across third party websites to provide targeted advertising. Accordingly, the Site does not respond to Do Not Track signals. Nonetheless, some third party websites linked from the Site may track customers over time or their conduct. Users should carefully review the applicable privacy policies for all third party websites.

**8. Social Security Numbers.** JCAHPO does not collect social security numbers of users. To the extent JCAHPO 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, JCAHPO 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.

## **9. Updating your Personal Information.**

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

## **10. Limitations**

JCAHPO is a private, non-for-profit organization based in Minnesota. All business transactions with JCAHPO are deemed to occur in Minnesota and are subject to Minnesota law. JCAHPO 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 JCAHPO to any stricter duty in its collection, handling, storage and disclosure of nonpublic information than otherwise applies to JCAHPO under applicable law. JCAHPO has created this Policy in good faith, using reasonably diligent business practices; however, no person or entity shall have any right or recourse against JCAHPO its affiliates, agents, sponsors, or other related parties based on any alleged violation or noncompliance with this Policy by JCAHPO.

## **11. Terms of Privacy Policy Survive**

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.

## 12. **Contacting JCAHPO**

We welcome your comments, suggestions, or questions about our privacy statement and JCAHPO privacy practices.

Please contact us:

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

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