

# PRIVACY POLICY

This Privacy Policy (the “Policy”) describes how SMISS (“SMISS”), as a data controller, collects and uses personal data about you when you visit and use f our website, or when you correspond or otherwise communicate with us. This Policy applies to information we collect about you on SMISS.org.

In this Policy, “we,” “our” and “us” means SMISS, and “you” or “your” means any person who visits the Website or otherwise corresponds with us.

SMISS is committed to maintaining the privacy of your online information; it is our priority to build your trust and confidence. Internet privacy is an issue that we take very seriously.

It is important for you to know what information is collected about you, what options you have concerning your information, how that information is used, with whom the information is shared, how we protect your information, and finally, how to contact us if you have additional questions or concerns.

We encourage you to take some time and read this entire Policy. This Policy does not apply to websites maintained by other companies or organizations to which we may link or who may link to us. We are not responsible for the actions and privacy policies of third party websites.

## What Information we collect

SMISS may collect a variety of personal data about you.

Personal data means information that directly identifies you (such as your name, address, or email address) or data that could be used to indirectly identify you (such an IP address or browser agents). You can browse our Website without submitting your personal data to us. However, there are circumstances in which you may supply us with your personal data, including but not limited to when you subscribe to our newsletters, and other content; The ways that SMISS collects information from you are described below.

## How we collect information

SMISS collects personal data in the following ways:

### **Registration**

Access to some of our services, may be limited to users who have registered an account with us. When you sign up for an account, we collect the personal data you submit to us through the registration process. Some of our tools do not

retain your personal data, while others store your personal data in accordance with this Policy.

### **Social Media**

When you interact with SMISS on a social media platform, such as Facebook, Twitter, or LinkedIn, we may collect the personal data that you make available to us on that page or account including your social media account ID. However, we comply with the privacy policies of the corresponding social media platform and we will only collect and store such personal data that we are permitted to collect by those social media platforms.

### **Newsletters & Emails to You**

You have the option of providing us with personal data in order to receive newsletters and other information via email from SMISS. We collect the personal data you provide to us when you sign up to receive these electronic communications from us (such as name, e-mail address, etc.)

### **Health Communities, Blogs & Other Public Forums**

SMISS may feature from time to time forums, blogs, or online discussions. Any information (including personal data) you share in any online community, including forums or online discussions, is open to members and on occasion to the public. You should always consider your online environment before posting any personal data in any forum. What you post may be seen, disclosed to, or collected by third parties and may be used by others in ways we cannot control or predict, including to contact you for unauthorized purposes. Your post may potentially show up in third-party search engines.

### **Emails You Send to SMISS**

When you send us personal data in your written communications with us, we may retain that personal data subject to this Policy.

### **Using Cookies and other Automatic Collection Methods**

We and third parties we work with may collect information from the computer, tablet, phone, or other device that you use to access our Website (such as IP addresses), or that you use to open an email from us. This collection includes automatically collected information, and does not include personal data that directly identifies you unless you provide it through our Website or you choose to share it with us.

Automatic collection methods we use may include cookies (which may be session-based or persistent, and typically are small data files that are stored on your hard drive or in connection with your Internet browser) and web beacons (small images embedded into websites or emails that send information about your computer, tablet, phone, or other device when you visit our website, or open an email we send to you) or pixel tags.

We use Google Analytics to measure and report how users interact with our Website, emails and advertisements to analyze the traffic to our Website and for

the other purposes set forth in the “How We Use Your Information” Section below. For more information about Google Analytics and how it collects and processes data, please see “How Google Uses Data When You Use Our Partners’ Sites or Apps.” Google’s ability to use and share information collected by Google Analytics about your visits to the Site is restricted by Google’s Terms of Service and Privacy Policy. If you do not want your website visit data reported by the Google Analytics JavaScript, you can install the Google Analytics opt-out browser add-on. This add-on instructs the Google Analytics JavaScript to prohibit sending visit information to Google Analytics, but does not prevent information from being sent to the website itself or in other ways to other website analytics services.

## How we use your information

Providing SMISS with your personal data helps us serve you better. Information collected by SMISS about you may be used by SMISS to:

- Administer your account;
- Provide you with access to particular tools and services;
- Respond to the inquiries you send us and to send you administrative communications about our Website or services;
- Obtain your feedback about the Website or our offerings;
- Statistically analyze user behavior and activity, including how frequently areas of the site are visited and how many emails are received and opened;
- Send you personalized emails or secure electronic messages pertaining to your medical interests, including news, announcements, reminders, and opportunities from SMISS;
- Send you relevant offers and informational materials pertaining to your medical interests on behalf of our sponsors;
- SMISS may combine personal and non-personal data collected about you by SMISS, and may combine this information with information from external sources.

## How we share your information

In general, SMISS does not share personal data about you with third parties for their own direct marketing or advertising purposes unless you request or consent to such sharing, or as otherwise described below. However, we do share personal data with third parties for the following limited purposes.

### **Disclosures to SMISS Contractors**

SMISS contractors sometimes have limited access to your personal data in the course of providing products or services to SMISS. These contractors include

vendors and suppliers that provide us with technology, services, data analysis, research, advertising, marketing assistance, and/or content in connection with our operation and maintenance of the Website. We contractually require that our contractors:

- Protect the privacy of your personal data consistent with this Policy, and
- Not use or disclose your personal data for any purpose other than providing the limited service or function for SMISS.

## **Traffic**

SMISS may count, track, and aggregate visitors' activity into our analysis of general traffic flows at our sites. SMISS will not disclose your individual identity or personal data without your permission. When SMISS does present aggregated information to outside companies, no one will be able to identify or contact you.

In addition, SMISS does not provide third-party access to your personal data except in the aggregate and only after the information has been anonymized and/or without your express permission. The information will be in the form of grouped statistics compiled from our users' answers to survey questions and on-site behavior.

SMISS does not sell any personal data about you, unless we have your explicit permission to do so.

## **Legal Compliance**

We may release personal data to third parties to comply with legal requirements such as a law, regulation, search warrant, subpoena, or court order, or in response to a physical threat to you or others, to protect property, or defend or assert legal rights.

## **Location of Data/Notice to non-US Persons**

Our Website is hosted and operated in the United States. In addition, we may further transfer your information outside the United States for the purposes described in this Policy. Those who access or use our Website from jurisdictions outside the United States do so at their own choice and risk and are solely responsible for compliance with local law. If you are not a resident of the United States, you acknowledge and agree that we may collect and use your personal information outside your home jurisdiction, and that we may store your personal information in the United States or elsewhere. While we take certain steps to safeguard your personal data, please note that the United States has NOT been deemed by the European Commission to ensure an adequate level of protection for personal data. Accordingly, the level of safeguards and legal protections provided in the United States or other non-European countries from which you may access our Websites may not be as stringent as that under European Union privacy standards or the privacy laws of some other countries, possibly including your home jurisdiction. BY CONTINUING TO USE THE WEBSITE,

YOU AGREE THAT YOU ACCEPT AND FULLY UNDERSTAND THE RISKS OF, AND EXPRESSLY CONSENT TO, THE TRANSFER, STORAGE AND PROCESSING OF YOUR PERSONAL DATA IN THE UNITED STATES AND OTHER COUNTRIES OUTSIDE OF THE EUROPEAN UNION BY SMISS IN ACCORDANCE WITH THIS POLICY.

## **How we protect your information**

SMISS uses reasonable security measures to protect the confidentiality of personal data under our control and appropriately limit access to it. We use a variety of information security measures to protect your online transactions with us. Our Website uses encryption technology to protect your personal data you submit via our Website and during data transport. That being said, SMISS cannot guarantee or warrant the security of information you transmit to us, and you do so at your own risk. We have taken reasonable steps to ensure the integrity and confidentiality of personal data that you may provide. However, electronic transmissions via the Internet are not necessarily secure from interception, and so we cannot absolutely guarantee the security or confidentiality of such transmissions.

## **How long we keep your information**

We will retain your personal data as long as your account is active and/or it is needed to provide you services. At any time, you can remove your personal data or instruct us to remove it. We will retain your personal data only for as long as necessary to comply with legal obligations, resolve disputes, and enforce our agreements.

## **Your Choices and Access Requests**

We strive to offer you choices about how certain personal data is used and shared. Your choices include:

### **Social Media Platforms and Networks**

We encourage you to review your privacy options and settings with the social media platforms and networks you use to understand what choices you have about sharing information from those platforms and networks with us.

### **Email Choices**

To further protect your privacy, you may choose to stop receiving communications from SMISS, or request that we no longer use your information to provide you services. To opt out, you can unsubscribe from a newsletter by clicking the unsubscribe link on the newsletter or promotional materials. You may choose to stop receiving newsletter or other marketing emails by following

the unsubscribe instructions included in these emails or you can contact us at [info@SMISS.org](mailto:info@SMISS.org).

### **Mobile Devices**

Your mobile device may offer settings relating to cookies, web beacons, and other similar technologies. We encourage you to visit your device's help menu to learn about your options to limit tracking when using your device.

## **Browsers do not track signals**

Some browsers have incorporated "Do Not Track" (DNT) features that can send a signal to the websites you visit indicating that you do not wish to be tracked. We currently do not respond to web browser DNT signals.

## **Links to other websites and services**

Our Website may provide links to other Internet sites, content or videos (embedded or direct links) maintained by third parties. We are not responsible for the sites, content, or videos accessed via the links, and we have not reviewed the privacy practices of those third parties. We encourage you to review the privacy practices of those third parties.

## **Rights of Residents in the European Union**

If you are a resident of the European Union, you have certain rights under European data protection law with respect to your personal data, including the right to request access to, correct, amend, delete, limit the use of, or withdraw your consent for the processing of your personal data. You also have the right to receive a copy of your personal data in a commonly used and machine-readable format and to transmit such data to another controller. To request deletion of, access to, or to make changes to data, or to otherwise exercise any of your rights in this paragraph, email us at [info@SMISS.org](mailto:info@SMISS.org). Please remember that if you delete or limit the use of your personal data, you may not be able to use the services provided through the Website.

# Rights of California Residents

Once per calendar year, California Civil Code Section 1798.83 provides California residents with the right to receive: information identifying (names and addresses) any third party(ies) to whom we may have disclosed, within the preceding calendar year, certain of your personal data for that third party's direct marketing purposes; and (b) a description of the categories of personal data disclosed, where and as required under this law. To request such information free of charge, please contact email us at [info@SMISS.org](mailto:info@SMISS.org)

## Children's Privacy

The Websites is not directed to or intended to be used by individuals under the age of 16. SMISS will never knowingly request personal data from anyone under the age of 16 without prior verifiable parental consent. If you believe that your child under the age of 16 has submitted personal data to us in connection with our Website, and without prior verifiable parental consent, please contact us at [info@SMISS.org](mailto:info@SMISS.org) so that we can take steps to delete the personal data that he or she provided as required in accordance with applicable law.

## Changes to this privacy policy

We reserve the right to change or modify this Policy or any of our tools or services at any time and any changes will be effective upon being posted unless we advise otherwise. We encourage you to periodically review our Website for the latest information on our privacy practices.

When we make material changes to this Policy, we will notify you by posting the updated Policy on our website, and we will update the effective date at the top of this Policy. By continuing to use our Website after being notified of material changes to this Policy, you agree that the terms of this Policy as of the effective date will apply to information previously collected or collected in the future.

## Contact Us

If you have additional questions about this Policy, please contact us at [info@SMISS.org](mailto:info@SMISS.org).

If your inquiry with SMISS has not be satisfactorily addressed, or if you believe we are processing your personal data not in accordance with the law or this

Policy, please contact [info@SMISS.org](mailto:info@SMISS.org) and we will do our best to resolve your concerns.

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