ASSOCIATION OF WOMEN IN RHEUMATOLOGY

PRIVACY POLICY

Last modified: September 1, 2020

<u>Introduction</u>

The Association of Women in Rheumatology ("AWIR", "we" or "us") respects your privacy, and we are

committed to protecting it through our compliance with this privacy policy ("Privacy Policy").

This Privacy Policy describes the types of information we may collect from you or that you may provide

when you visit the website www.awirgroup.org (our "Website") and our practices for collecting, using,

maintaining, protecting, and disclosing that information.

This Privacy Policy applies to information we collect:

On this Website.

In email, text, and other electronic messages between you and this Website.

It does not apply to information collected by:

• Us offline or through any other means, including on any other website operated by Company or any

third party (including our affiliates and subsidiaries); or

Any third party (including our affiliates and subsidiaries), including through any application or

content (including advertising) that may link to or be accessible from or on the Website.

Please read this Privacy Policy carefully to understand our policies and practices regarding your

information and how we will treat it. If you do not agree with our policies and practices, your choice is

not to use our Website. By accessing or using this Website, you agree to this Privacy Policy. This Privacy

Policy may change from time to time (see Changes to Our Privacy Policy). Your continued use of this

Website after we make changes is deemed to be acceptance of those changes, so please check the

Privacy Policy periodically for updates.

Children

Our Website is not intended for persons under 18 years of age. No one under age 18 may provide any

information to or on the Website. We do not knowingly collect personal information from persons

under 18. If you are under 18, do not use or provide any information on this Website or on or through

any of its features. If we learn we have collected or received personal information from a person under

18 without verification of parental consent, we will delete that information. If you believe we might

have any information from or about a person under 18, please contact us at:

Website: https://awirgroup.org/contact/

Email: info@awirgroup.org

Postal Address:

Association of Women in Rheumatology

2125 Valleygate Drive, Suite 201

Fayetteville, NC 28304

Attn: President

Information We Collect About You and How We Collect It

We collect several types of information from and about users of our Website, including information:

• By which you may be personally identified, such as name, postal address, e-mail address, telephone

number, or any other identifier by which you may be contacted online or offline ("personal

information").

That is about you but individually does not identify you; and/or

About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

Directly from you when you provide it to us.

Automatically as you navigate through the site. Information collected automatically may include

usage details, IP addresses, and information collected through cookies and other tracking

technologies.

Information You Provide to Us.

The information we collect on or through our Website may include:

Information that you provide by filling in forms on our Website. This includes information provided at

the time of registering to use our Website, applying to become a member of AWIR, posting material,

or requesting further goods or services. We may also ask you for information when you report a

problem with our Website.

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- Records and copies of your correspondence (including email addresses), if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through our Website and of the fulfillment of your orders. You may be required to provide financial information before placing an order through our Website.
- Your search queries on the Website.

You also may provide information to be published or displayed (hereinafter, "posted") on public areas of the Website or transmitted to other users of the Website or third parties (collectively, "User Contributions"). Your User Contributions are posted on and transmitted to others at your own risk. Although we limit access to certain pages, please be aware that no security measures are perfect or impenetrable. Additionally, we cannot control the actions of other users of the Website with whom you may choose to share your User Contributions. Therefore, we cannot and do not guarantee that your User Contributions will not be viewed by unauthorized persons.

<u>Information We Collect Through Automatic Data Collection Technologies.</u>

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is only statistical data and does not include personal information. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You
 may refuse to accept browser cookies by activating the appropriate setting on your browser.
 However, if you select this setting you may be unable to access certain parts of our Website. 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 Website.
- Flash Cookies. Certain features of our Website may use local stored objects (or Flash cookies) to
 collect and store information about your preferences and navigation to, from, and on our Website.
 Flash cookies are not managed by the same browser settings as are used for browser cookies. For
 information about managing your privacy and security settings for Flash cookies, see Choices About How We Use and Disclose Your Information.

We do not collect personal information automatically, but we may tie this information to personal information about you that we collect from other sources or you provide to us.

How We Use Your Information

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.
- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To provide you with notices about your account, including expiration and renewal notices.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide though
 it.
- To allow you to participate in interactive features on our Website.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

Disclosure of Your Information

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We may disclose personal information that we collect, or you provide as described in this Privacy Policy:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of AWIR's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by AWIR about our Website users is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our <u>Terms of Use</u> and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of AWIR, our members, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

Tracking Technologies and Advertising. You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. To learn how you can manage your Flash cookie settings, visit the Flash player settings page on Adobe's <u>website</u>. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.

We do not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's website.

• **Nevada Opt-Out Rights**. Nevada residents who wish to exercise their sale opt-out rights under Nevada Revised Statutes Chapter 603A may submit an email request to *info@awirgroup.org*. However, please know we do not currently sell data triggering that statute's opt-out requirements.

Accessing and Correcting Your Information

You can review and change your personal information by logging into the Website and visiting your account profile page.

If you delete your User Contributions from the Website, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other Website users. Proper access and use of information provided on the Website, including User Contributions, is governed by our <u>Terms of Use</u>.

Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, see the **Privacy Notice for California Residents** appended to the end of this Privacy Policy.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone. We urge you to be careful about giving out information in public areas of the Website like message boards. The information you share in public areas may be viewed by any user of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we

do our best to protect your personal information, we cannot guarantee the security of your personal

information transmitted to our Website. Any transmission of personal information is at your own risk.

We are not responsible for circumvention of any privacy settings or security measures contained on the

Website.

Changes to Our Privacy Policy

It is our policy to post any changes we make to our Privacy Policy on this page. If we make material

changes to how we treat our users' personal information, we will notify you by email to the primary

email address specified in your account. The date the Privacy Policy was last revised is identified at the

top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email

address for you, and for periodically visiting our Website and this Privacy Policy to check for any

changes.

Contact Information

To ask questions or comment about this Privacy Policy and our privacy practices, contact us at:

Website: https://awirgroup.org/contact/

Email: info@awirgroup.org

Postal Address:

Association of Women in Rheumatology

2125 Valleygate Drive, Suite 201

Fayetteville, NC 28304

Attn: President

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PRIVACY NOTICE FOR CALIFORNIA RESIDENTS

Effective Date: September 1, 2020

This Privacy Notice for California Residents supplements the information contained in AWIR's Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and any terms defined in the CCPA have the same meaning when used in this Notice.

Information We Collect

Our Website collects information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("personal information"). Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data.
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

In particular, our Website has collected the following categories of personal information from its consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card	YES

statute (Cal. Civ. Code § 1798.80(e)).	number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Our Website obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our Website.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to apply for membership in AWIR, we will use that personal information to process your application and maintain your membership. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate new product orders or process returns.
- To provide, support, personalize, and develop our Website, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers through our Website, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.

As described to you when collecting your personal information or as otherwise set forth in the

CCPA.

To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other

sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy,

liquidation, or similar proceeding, in which personal information held by us about our Website

users is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we

collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose

personal information for a business purpose, we enter a contract that describes the purpose and

requires the recipient to both keep that personal information confidential and not use it for any purpose

except performing the contract.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, Company has disclosed the following categories of personal

information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

Category D: Commercial information.

Category F: Internet or other similar network activity.

Category I: Professional or employment-related information.

We disclose your personal information for a business purpose to the following categories of third

parties:

Service providers, including our Website developer/maintenance provider, our credit card

payment processor, and our event-registration service provider.

Sales of Personal Information

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In the preceding twelve (12) months, Company has not sold personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, and Deletion Rights*), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold your personal information or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, and Deletion Rights*), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- 1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
- 2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- 3. Debug products to identify and repair errors that impair existing intended functionality.
- 4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- 5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
- 6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- 7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- 8. Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Writing to us at Association of Women in Rheumatology, 2125 Valleygate Drive, Suite 201, Fayetteville, NC 28304, Attn: President.
- Emailing us at info@awirgroup.org; or
- Visiting https://awirgroup.org/contact/

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out Rights

If you are a California resident and 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). However, because we do not sell the

personal information of any of our consumers, you do not need to exercise the right to opt-out in order to restrict the sale of your personal information.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that **can result** in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Other California Privacy Rights

California's "Shine the Light" law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. We do not disclose personal information to third parties for their direct marketing purposes.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

Contact Information

If you have any questions or comments about this notice, the ways in which AWIR collects and uses your information described here and in our main Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Website: https://awirgroup.org/contact/

Email: info@awirgroup.org

Postal Address:

Association of Women in Rheumatology 2125 Valleygate Drive, Suite 201 Fayetteville, NC 28304

Attn: President