AMERICAN ASSOCIATION OF DIRECTORS OF PSYCHIATRIC RESIDENCY TRAINING PRIVACY POLICY

Please read this entire policy. By continuing to use AADPRT's website, you confirm that you understand and accept the terms of this Privacy Policy. If you do not agree with this Privacy Policy, please do not use the AADPRT website.

Introduction:

The American Association of Directors of Psychiatric Residency Training (AADPRT) is a non-profit membership organization comprised of psychiatrists primarily from the United States. AADPRT works to further the education and professional development of psychiatry educators and program coordinators. It welcomes individual and institutional members to take advantage of its networking, educational offerings, and especially its annual meeting where the best and brightest gather to learn from one another and advance the field of psychiatry. To better meet the nation's mental healthcare needs, the mission of AADPRT is to promote excellence in the education and training of future psychiatrists.

To assist us in achieving the above goals, we collect and process certain information you provide us. We work hard to be good stewards of your information. This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can control how we update, manage, export, and delete your information.

What do we collect and how:

Anonymous and Aggregated Web Traffic Information.

General traffic, site usage and pages accessed, browser information, length-of-stay information, and location data, may be collected and stored in log files. This type of information may be shared on an anonymous, aggregated basis meaning that we do not connect this information to your name or other personal information.

Personal Information (non-financial).

We may collect all or some of the following types of personal information: first and last name, street address, city, state, zip code, telephone number, email address, professional and educational history, demographic information and subject of inquiry, including in the following contexts:

<u>AADPRT Website Registration</u>: When you register to at our websites, we ask for your name, email address and a password.

AADPRT Membership Application: When applying to become an AADPRT member, we ask for contact information that we may collect and track. You can access submitted information by entering your user name and password each time you use the website. We may also ask about race and other demographic information. The option to provide or decline to provide race and demographic information is voluntary.

<u>AADPRT Donation</u>: When giving a donation to AADPRT, we ask for contact information that we may collect and track and use for the purposes of issuing you a letter for tax purposes and acknowledging your gift at the annual meeting. You can request submitted information by contacting the AADPRT office at exec@aadprt.org.

<u>Event Registration</u>: If you register to participate in the AADPRT Annual Meeting using an online registration form, we collect and store your name, address, phone number, email address, and any additional information you voluntarily provide on the registration form.

<u>Products/Programs</u>: In connection with certain online learning products, subscriptions and programs hosted by AADPRT or one of our vendors on AADPRT's behalf, we may collect some contact information and other background information.

<u>Product Purchase</u>: If you purchase a subscription product or other item from AADPRT we will collect the information necessary to fulfill your order, which may include name, address, phone number, email address and any additional information you voluntarily provide on the order form.

<u>Requests</u>: We collect information volunteered by users, including from surveys or requests via "Contact AADPRT." We also may collect email addresses of those who communicate with us via email.

<u>AADPRT Member Search</u>: We disclose the contact information AADPRT members provide in the AADPRT Member Directory. The directory is a reference tool for AADPRT members only. Users of the directory are prohibited from providing the contact information (name, address, phone number) contained in the directory to others or using it for promotional or survey purposes without the written permission of the AADPRT. Excessive use or abuse of the directory may result in loss of access for the user.

<u>Other Information</u>: For some goods and services you also have the option of voluntarily offering additional information about yourself which may include demographic information, such as race or gender, and information about your practice of medicine and professional interests.

Financial Information.

We collect financial information to fulfill products or services you order. When you place an order online with us, register for an event, or pay your dues electronically, standard credit card information (card number, card type, expiration date, etc.) is collected through a third-party payer who is compliant with Payment Card Industry data security standards. The third-party payer provides us with, and we store, the last four digits of your credit card number, which is retained for purposes of issuing applicable refunds.

Information from Third Parties.

AADPRT uses third parties to help promote, market, and sell our products and services. We may receive from and exchange with these third parties information about you. Examples include the following: (1) platforms we use for ordering of books and subscriptions, marketing emails, list serves; (2) our customer relationship management platform for membership information and information about attendees for events and meetings; (3) continuing medical education credit claim platforms; (4) our AADPRT Meetings App, a tool that allows AADPRT event attendees to plan their time and connect with other participants; (Personal information posted by users of the app to the social media feed will be visible to AADPRT and other users. AADPRT receives data from the app about your interactions); (5) AADPRT's job board.

What we do with the information we collect:

We process your information to provide the products or services you request from us; and in communicating with our members, meeting attendees, and other users about, and to provide access to, education via AADPRT's in-person conferences, tools for practice management and patient education (including clinical practice guidelines), publications, and other products and services pertinent to AADPRT's promotion of quality psychiatric care and efforts to enhance AADPRT member career satisfaction. AADPRT exists for the benefit of its members and users and through the support of its customers. Processing your information for the purposes described is necessary for us to conduct the business of the AADPRT. When we use your information, we attempt to balance our legitimate business interests and the necessity of processing your information with how such processing impacts you.

If you have any questions or concerns about our processing of your information, please contact us by email at <u>exec@aadprt.org</u>.

We'll ask for your consent before using your information for a purpose that extends beyond those described in this Privacy Policy or what you may reasonably expect from a medical specialty association.

AADPRT works and shares information with vendors, including in the following categories, to help fulfill our mission and process your information for the purposes described in this document: publication sales agent and platform; conference registration manager and event service provider; payment processor; bulk email and postal mail communication manager; conferences app developer; syllabi, abstract, and presentation manager; volunteer management provider; distributors; and survey provider. AADPRT provides contact information for its members who wish to receive informational journal offerings (such as *Academic Psychiatric Journal*) to third-party vendors who transmit AADPRT materials on AADPRT's behalf. AADPRT also shares limited personal information with other nonprofit organizations and government agencies for the purposes of complying with requirements related to its educational offerings and other accreditation services it offers to AADPRT members and customers (e.g., continuing medical education and board certification accreditation information).

These outside companies are required to use information to perform the services and actions for which they have been engaged by AADPRT and are not authorized to use such information for any other purpose.

AADPRT may provide a list of contact information other than email address for its North American members or event attendees from North America to organizations who request such information because they wish to engage with psychiatric professionals.

You may be asked by specific AADPRT vendors to consent to their processing of your information when such processing will be subject to their privacy policy. We encourage you to review such policies closely and be sure that you agree to them before providing your consent.

The AADPRT website may provide links (including any link through an on-line banner advertisement) to other sites on the Internet. These other sites are maintained by third parties over which AADPRT exercises no control. The appearance of any such third-party links is not intended to endorse any particular company or product. If you decide to access any of the third-party sites linked to the AADPRT websites, you do so entirely at your own risk and information you submit to them will be governed by their privacy policy, not this

one. AADPRT is not responsible for the services, content, conduct or handling of materials by any third-party advertisers appearing on an AADPRT website.

What are cookies and how do we use them:

As part of offering and providing customizable and personalized services, we use cookies and other online tracking technologies (such as pixel tags and web beacons) on our sites to store and sometimes track information about you to

- Provide you with personalized content based on your use of our websites
- Enable you to more easily use our website by remembering and using contact information
- Evaluate, monitor and analyze the use of our site and its traffic patterns to help improve our websites and services
- Assist us with ad reporting functions such as to learn which ads are bringing users to our websites

The types of technologies we use include the following:

Cookies.

A cookie is a small amount of data that is sent to your browser from a Web server and stored on your computer's hard drive. Cookies enable us to identify your browser as a unique user. Cookies may involve the transmission of information from us to you and from you to us. Cookies may also be used by another party on our behalf to transfer information to us in accordance with their privacy policy. Some cookies are "persistent cookies." They are used by us each time you access our website. Other cookies are "session cookies." Session cookies are used only during a specific browsing session. We may use a session cookie, for example, to remember that you have already navigated through a particular menu. We may also use "analytics cookies" that allow web analytics services to recognize your browser or device and, for example, identify whether you have visited our website before, what you have previously viewed or clicked on, and how you found us. This information is provided anonymously for statistical analysis only. Analytics cookies are usually persistent cookies.

You may disable browser cookies in your browser or set your browser to warn you when a cookie is being sent. You may lose some features or functionality when you disable cookies. Remember, also, that disabling cookies is browser specific. If you use both Microsoft Edge and Chrome, you will need to disable cookies in each browser.

Pixel Tags.

We also employ a software technology known as a pixel tag or Web beacon. A pixel tag is a line of code that we place on our websites or in emails which allows us to analyze our messages and the general usage patterns of visitors to our websites. Pixel tags help us better manage content on our site by informing us what content is effective. Unless you consent, we do not collect personally identifiable information from you using pixel tags. You may not disable pixel tags.

Indirect Collection – Analytics.

Our website uses Google Analytics and Google Tag Manager, which are web analysis services offered by Google, Inc. to help AADPRT analyze how users interact with our sites. You can learn more about these products from Google's Terms of Service and Privacy Policy. You may opt- out of the use of such web analytic products by downloading the "Google Analytics Opt-out Browser Add-on" browser plugin offered by Google (available <u>here</u> as of May 25, 2018). We use Google Analytics and Google Tag Manager to analyze the use of our website. We do not transfer personal information to Google Analytics.

AADPRT may retain the non-identifying information derived from our use of cookies, web beacons, Google Analytics, and other similar technologies for up to twenty-six (26) months.

Choices you have about your information:

If you are a registered user of the AADPRT website, an AADPRT member, or event attendee, you can review, correct and change your personal information and your communication preferences by logging into the website and visiting your account profile page.

If you select the 'unsubscribe' link in any promotional email from AADPRT or contact us directly at <u>exec@aadprt.org</u> to unsubscribe from communications, AADPRT will stop sending promotional materials to you. You may also send us an email at exec@aadprt.org to request access to, correction of, or deletion of any personal information that you have provided to us. Please note we may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

AADPRT vendors, including those described in this Privacy Policy, with whom you engage directly, should provide information on reviewing, correcting, or changing your personal information or communication preferences within their systems.

Our website does not support "Do Not Track" (DNT) codes, which are used in the privacy preferences of web browsers.

How do we protect your information?

We have appropriate security measures in place to prevent personal information we hold from being accidentally lost or used or accessed in an unauthorized way. We limit access to your personal information to those persons or vendors who have a genuine business purpose to access it. Those processing your information will do so only in an authorized manner.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach when we are legally required to do so.

How long we keep your information:

We keep your information to provide the service you've requested of us (such as membership, meeting attendance, publication subscription, etc.) and to fulfill the purposes described in this Privacy Policy, including for twelve (12) months after any commercial relationship between you and AADPRT expires. At or about the twelve-month mark, if we no longer need to use your information for the purpose for which we collected it and there is no need for us to keep it to comply with our legal or other regulatory obligations, we will either remove it from our systems or depersonalize it so that we cannot identify you, with the exception of an email address which AADPRT will keep and use for the sole purpose of informing you of AADPRT products and services in which you may be interested.

AADPRT vendors who contact you directly as described in this policy, may have different retention periods for your information, which you should discuss directly with the applicable vendor.

For our Members/Customers in the EU:

This Privacy Policy includes information applicable to residents of the European Economic Area ("EEA") and users accessing the AADPRT website from within the EEA. If you are an

EEA resident, this Privacy Policy provides you with information regarding your rights under the EU General Data Protection Regulation (EU) 2016/679 ("GDPR").

AADPRT is the data controller for the personal information collected from its members and customers. AADPRT can be contacted any time at:

AADRPT

PO Box 30618 Indianapolis, IN 46230 exec@aadprt.org

Transfer of Personal Data

AADPRT and our website is based in the United States and, regardless of where you access our website, the information collected as part of that use will be transferred to and maintained on systems located in the United States. Additionally, in limited circumstances, it may be necessary for AADPRT to require the transfer of personal information from a third-party entity within the EEA to the United States for AADPRT to provide requested services to a customer in the EEA. In any such circumstance, AADPRT will ensure that the transfer of information is made in accordance with Article 49 of the GDPR in that it will be done only to perform a contract with you or to implement pre- contractual measures taken at your request. Should it otherwise be required for AADPRT to receive personal data from another entity within the EEA, to ensure there is an adequate level of protection for the rights of a European person based on the United States' data protection laws, AADPRT will make use of either the EU-U.S. Privacy Shield framework or contractual data protection clauses and similar legal mechanisms to safeguard the transfer, use, sharing and retention of personal data from the EEA in any such circumstance.

Your Rights

The GDPR provides you with certain privacy rights, including the right to access, correct or update your personal information. You may also request to have your information deleted, although we may retain information for backups, prevention of fraud and abuse, satisfaction of legal obligations or other ongoing legitimate interests. You have the right to receive a copy of your information in a structured, machine-readable format. You may decline to share certain personal data, in which case we may not be able to provide you with some features and benefits. If you are an EEA resident, you have the right to object to our processing that is based on legitimate interests.

If you wish to exercise any of the rights granted to you by the GDPR, contact us via email at <u>exec@aadprt.org</u> or via mail to the address set forth above.

Right to Lodge a Complaint.

If you are an EEA resident and you believe that AADPRT has infringed your rights under the GDPR, please contact us by sending an email to <u>exec@aadprt.org</u>.

Sensitive Information.

AADPRT requests that persons to whom the GDPR applies do not volunteer any personal data considered sensitive by the GDPR, including racial or ethnic origin or sexual preference, even if a field exists for such information to be voluntarily provided.

For our Members/Customers in California:

California Civil Code Section 1798.83 permits our website visitors who are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please contact us at: AADPRT, PO Box 30618, Indianapolis, IN 46230; <u>exec@aadprt.org</u>. Please make sure to state in the request that you are a California Resident.

How we make changes to this policy:

When we change the Privacy Policy, we'll post any changes on this page. If you continue to use our website after those changes are in effect, you agree to the new policy. If the changes are significant, we may provide a more prominent notice or get your consent, as may be required by law.

Contact us:

If you have any questions about this Privacy Policy or need to contact AADPRT to exercise your rights as a data subject under the GDPR, please contact us at: <u>exec@aadprt.org</u>.

Last Updated and approved: September 8, 2018