

# Privacy Policy

Revised May 25, 2018

The Society of University Otolaryngologists – Head & Neck Surgeons, the Association of Academic Departments of Otolaryngology – Head & Neck Surgery, and the Otolaryngology Program Directors Organization (collectively "SUO/AADO/OPDO," "we," or "us") knows that you care how your information is used and shared. This Privacy Policy ("Policy") describes our policies with respect to information that SUO/AADO/OPDO collects through the website at <http://www.suo-aado.org/> ("Website") and in connection with SUO/AADO/OPDO membership, conferences, and other products or services.

## Changes in this Policy

SUO/AADO/OPDO may amend this Policy at any time without notice. Changes to this Policy may affect our use of personally identifiable information that you provided us prior to our notification to you of the changes. Please visit our Website to obtain current information about our Policy.

SUO/AADO/OPDO uses various technologies to protect the confidentiality, security, and integrity of information volunteered or collected from users of the Website. We do not require anyone to divulge any personally identifiable information to use the Website. SUO/AADO/OPDO on occasion requires a user to register, when for example applying for membership or purchasing products or services. SUO/AADO/OPDO will not collect personal information about you unless the information is provided voluntarily by you.

## I. Information SUO/AADO/OPDO Collects

The information we collect generally includes: (1) personal information you supply and (2) tracking information collected as you navigate through the Website.

### Information Collected from You

We may collect and store personally identifiable information that you provide to us. The personally identifiable information we request from you may include your: (i) country of residence; (ii) first, middle, and last name; (iii) age and date of birth; (iv) highest level of education attained; (v) job title; (vi) home or office phone and fax numbers; (vii) employer's name and address; (viii) home or office address; (ix) home or office e-mail address; (x) member identification number, user ID, and password; and (xi) credit card information (only if purchases are made) (collectively "Personal Data").

### Information Collected Through Technology

Primarily to tailor the Website to your needs, SUO/AADO/OPDO collects information using technology, such as IP addresses and cookies. For example, your IP address provides SUO/AADO/OPDO with non-personally identifiable information about how you entered the Internet, namely through your Internet service provider, your company, or some other source, and can permit SUO/AADO/OPDO to identify the frequency with which you visit the Website. Standard features in Internet browser software such as "cookies" allow Websites to track certain user activities by assigning each of our visitors a unique number that resides on your computer. SUO/AADO/OPDO uses cookies to make the Website more interesting and useful (for example, cookies let us know which of our sites you have been visiting and which you have not).

## Information Is Not Collected Online from Children Under 13

SUO/AADO/OPDO does not knowingly collect any personally identifiable information online from children under the age of 13.

## II. How SUO/AADO/OPDO Uses That Information

SUO/AADO/OPDO uses your personally identifiable information for the purposes for which it was submitted. For example, SUO/AADO/OPDO uses the information collected to enable a user to: (i) fulfill membership benefits (ii) purchase SUO/AADO/OPDO educational materials for purposes of obtaining Continuing Medical Education ("CME") credit, (iii) pay membership dues, (iv) make charitable contributions, (v) to purchase other SUO/AADO/OPDO products, (vi) to receive SUO/AADO/OPDO newsletters and product and/or service announcements, (vii) to participate in SUO/AADO/OPDO sponsored meetings, programs, and activities; and (viii) such other use related to SUO/AADO/OPDO's mission. We do not undertake to maintain any information about you for a duration greater than necessary to provide services to you or as provided by law, rule or regulation.

SUO/AADO/OPDO may use your personally identifiable information in a public directory and/or a private member directory. Participation in the SUO/AADO/OPDO directory is entirely optional. In the event that you choose to participate in the SUO/AADO/OPDO directory you acknowledge that your personally identifiable information will be available to search, access and view by the general public. You may elect to not participate in the directory by updating your profile or by contacting us using the contact information listed below.

SUO/AADO/OPDO may use information about use of the Website and aggregated information about you and other visitors to our Website in order to improve our Website and develop content and services that may be of interest to you and for its other business purposes.

## III. Security Measures Taken to Protect Personally Identifiable Information

SUO/AADO/OPDO uses firewalls, vulnerability scans, and secure server encryption technology to protect personally identifiable information. SUO/AADO/OPDO also employs internal physical and technologic security measures to detect and block unauthorized intrusions to its computer systems. However, while we employ reasonable security measures to protect your personal information, please be aware that no method of electronic transmission is completely infallible, and we cannot guarantee its absolute safety.

## IV. Information Sharing with Third Parties

Limited personally identifiable information we request from you (namely, your name and home or office address) is occasionally sold to third parties, generally for educational programs. For example, the list of registrants to a SUO/AADO/OPDO Meeting may be sold to exhibitors to the SUO/AADO/OPDO Meeting. Moreover, personally identifiable information is occasionally shared with third parties so that these parties can send you promotional material about goods and services offered by SUO/AADO/OPDO or the third parties.

We may also share your personal information with our authorized service providers that perform certain services on our behalf. These services may include providing customer service, performing business and sales analysis, and supporting our Website functionality, other features offered through our Website.

These service providers may have access to personal information needed to perform their functions but are not authorized to share or use such information for any other purposes.

We may also provide your information to third parties to accomplish the purpose for which the information was submitted, such as providing your personally identifiable information to credit card processors to process a purchase.

We may also transfer user or customer information, including personally identifiable information, in connection with a corporate transaction, such as a divestiture, merger, consolidation, or asset sale.

We may disclose specific information in response to a valid court order, subpoena, government investigation, or as otherwise required by law, to enforce our Website policies, or to protect our or others' rights, property, or safety. We reserve the right to report to law enforcement illegal uses of the Website, or defend ourselves against third-party claims. We may also share information with companies assisting in fraud protection or investigation. We do not provide information to these agencies or companies for marketing or commercial purposes.

## V. Rights in Relation to Your Personal Data

SUO/AADO/OPDO enables users of its Website and interactive educational products to update contact information and to opt out of the collection of personally identifiable information or particular communications or services by e-mail, telephone, or regular mail. Please use the contact information listed below. Due to production, mailing, and system timelines, it may take some time to process your request. In addition, we may still use your information to communicate with you for other purposes, such as for customer service.

**Right of access:** Upon request, SUO/AADO/OPDO will confirm any processing of your Personal Data and, and provide you with a copy of that Personal Data in an acceptable machine-readable format.

**Right to rectification:** You have the right to have SUO/AADO/OPDO correct any inaccurate Personal Data or to have SUO/AADO/OPDO complete any incomplete Personal Data;

**Right to restrict processing:** You have the right to ask SUO/AADO/OPDO to suppress the processing of your Personal Data but SUO/AADO/OPDO may still store your Personal Data.

**Right to object to processing:** You have the right to object to your Personal Data used in the following manners: (a) processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); (b) direct marketing (including profiling); and (c) processing for purposes of scientific/historical research and statistics.

**Right to erasure:** You may ask SUO/AADO/OPDO to delete or remove your Personal Data and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other interests outweigh your right to deletion).

**Right to data portability:** Effective 25 May 2018, you have the right to obtain your Personal Data from us that you consented to give us or that is necessary to perform fulfillment of member benefits with you. We will give you your Personal Data in a structured, commonly used and machine-readable format.

**Right to withdraw consent:** We rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing based on your prior consent.

**Right to file a complaint with a supervisory authority:** You have the right to file a complaint with a supervisory authority, in particular in the European Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of Personal Data relating to you infringes upon your rights.

You may exercise your rights by contacting us as indicated under “Contact Us” section below.

## VI. Transfer and Storage of Your Information

Please note information SUO/AADO/OPDO collects about you may be transferred, processed and/or accessed by us in the United States, or another country where we, or our Service Providers operate. Please be aware Personal Data may be transferred to, and maintained on, computers located outside of your state or country where privacy laws may differ from and may not be as protective as those where you live. If you are located outside the United States and choose to allow us to collect information about you, please be aware that SUO/AADO/OPDO may transfer your Personal Data to the United States and process and store it there.

If you are located in the European Economic Area ("EEA") or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information to a country or jurisdiction that does not have the same data protection laws as your jurisdiction, as disclosed in this Privacy Policy. It may also be processed by staff operating outside the EEA who work for us or for one of Service Providers, also as disclosed.

**Website Hosting:** SUO/AADO/OPDO works with YourMembership as its web hosting services provider. YourMembership is located in St. Petersburg, FL and the Website is stored by YourMembership in St. Petersburg, FL. SUO/AADO/OPDO shares your data, including Personal Data, with our website hosting Service Provider for the purposes of processing your data pursuant to your use of the Services.

**Data Hosting:** SUO/AADO/OPDO works with YourMembership as its data hosting services provider. YourMembership is located St. Petersburg, FL and SUO/AADO/OPDO’s data are stored by YourMembership in St. Petersburg, FL. SUO/AADO/OPDO shares your data, including Personal Data, with our data hosting Service Provider for the purposes of processing your data pursuant to your use of the Services.

### **Safely Using SUO/AADO/OPDO’s Services**

Despite SUO/AADO/OPDO’s safety and privacy controls, we cannot guarantee the Services are entirely free of illegal, offensive, pornographic, or otherwise inappropriate material, or that you will not encounter inappropriate or illegal conduct from other Users when using the Services. You can help SUO/AADO/OPDO by notifying us of any unwelcome contact by contacting us using the information below.

### **Your California Privacy Rights**

Under California Civil Code Section 1798.83 (known as the "Shine the Light" law), SUO/AADO/OPDO members and customers who are residents of California may request certain information about our disclosure of personal information during the prior calendar year to third parties for their direct

marketing purposes. To make such a request, please write to us at the address below or at [suo@facs.org](mailto:suo@facs.org) with "Request for California Privacy Information" on the subject line and in the body of your message. We will comply with your request within thirty (30) days or as otherwise required by the statute. Please be aware that not all information sharing is covered by the "Shine the Light" requirements and only information on covered sharing will be included in our response.

## Questions or Comments

If you have any questions or comments about SUO/AADO/OPDO's privacy policy, please contact us at:

SUO/AADO/OPDO  
c/o Association Management  
American College of Surgeons  
Attn: Data Protection Officer/Privacy Policy Coordinator  
633 North Saint Clair Street  
Chicago, Illinois 60611-3211  
Tel: 312-202-5674  
E-mail: [suo@facs.org](mailto:suo@facs.org)

## VII. Miscellaneous

### Terms of Use

This Policy is subject to, a part of, and incorporated into the Terms of Use which can be found at <http://www.suo-aado.org/>.

### International Users

This Website is operated, in whole or in part, from the United States. By using this Website, regardless of where you live in the world, you consent to have your Personal Data transferred to and processed in the United States, and allow SUO/AADO/OPDO to use and collect your personal information in accordance with this Policy.

### Third Party Links

The Website may also contain links to other third party websites that are not under our control. These websites may have their own policies or no policies at all, regarding privacy. You should seek and review these policies before providing information to these websites. SUO/AADO/OPDO has no responsibility for linked websites and provides these links solely for the convenience and information of our visitors. SUO/AADO/OPDO also maintains a strict "no-spam" policy and fully complies with CAN-SPAM Act regulations.