**NOTICE OF PERSONAL DATA PROCESSING**

**Children’s Hospital Medical Center (“CHMC,” “Corporation,” “Company,” “Our,” and “We”) respects your privacy and is committed to protecting your privacy through Our compliance with this Notice and Our Privacy Policy (“the Policy”). In accordance with Our Company’s existing Terms of Use, CHMC is committed to complying with the requirements of the European Union’s General Data Protection Regulation, or “GDPR.” To that end, this Notice of Personal Data Processing (“Notice”) shares how Our Company collects, stores, uses, shares, and disposes of your personal data, as well as advises you of ways in which you can exercise your rights under the GDPR.**

 **This Notice describes the types of information We may collect from you or that you may provide when you visit the website https://cchmc.cloud-cme.com. (the “Website”) and Our practices for collecting, using, maintaining, protecting, and disclosing that information.**

 **This Notice applies to information We collect on this Website or in email and other electronic messages between you and this Website. It does not apply to information collected on any other website operated by a third party.**

**Data Controller: Who We Are.**
CHMC is responsible for this Notice and is a “Controller” for purposes of processing personal data and as defined in the GDPR. We are responsible for operating and maintaining the Website. Any trusted third parties with which We share your personal data as described in this Notice are “Processors” as defined in the GDPR.

**Goods and Services: What We Offer.**
The Website is a platform through which CHMC provides information on programs, and allows for registration for continuing medical education services.

**Personal Data: What We Collect.**
We only collect basic personal data about you or from you, and do not intentionally collect any sensitive data. The personal data We collect may include:

* Your first and last name
* Your email address
* Your mailing address
* Your phone number
* Credit card or payment data
* IP address
* Email correspondence with us

**Automatic Collection of Data**.
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, 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 technologies We or Our trusted third parties 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.

Do Not Track Disclosure. We do not track customers over time and across third party websites to provide targeted advertising. Therefore, Our Website does not operate any differently when it receives Do Not Track (DNT) signals. The information We collect automatically is statistical data and does not include personal data.

**Purposes: Why We Need Your Personal Data**
We use information that We collect about you or that you provide to us, including any personal data, in order to:

* To present Our Website and its contents to you.
* To provide you with information or services that you request from us.
* To fulfill any other purpose for which you provide it.
* 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 through it.
* In any other way We may describe when you provide the information.
* For any other purpose with your informed consent.

**Processing: What We Do With Your Personal Data**
All personal data We process is processed by Our staff or trusted third parties in the United States of America and other countries.

We may disclose aggregated information about Our users, and information that does not identify any individual, without restriction. We may disclose personal data that We collect or you provide as described in this Notice:

* To Our trusted subsidiaries and affiliates.
* To contractors and service providers We use to support Our business.
* 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 Corporation's assets, whether as an ongoing concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal data held by the Corporation about Our Website users is among the assets transferred.
* To fulfill the purpose for which you provide the personal data.
* For any other purpose disclosed by us when you provide the personal data.
* To comply with any court order, law or legal process, including to respond to any government or regulatory request.
* To enforce or apply Our terms of use available at: <https://www.cincinnatichildrens.org/site>
* If We believe disclosure is necessary or appropriate to protect the rights or the property of Corporation, Our customers or others.

We may otherwise disclose your personal data only for purposes disclosed in this Notice or on the Website, as required by law, or with your informed consent.

**Organizational and Technical Safeguards: How We Protect Your Personal Data**
Processing of personal data happens in strict accordance with Our Company’s data governance program, which includes implementing reasonable organizational and technical safeguards to protect personal data from unauthorized use, disclosure, or destruction. Such organizational safeguards including binding Our trusted third parties to contracts and requiring the same or better organizational or technical safeguards for your personal data.

We have implemented measures designed to secure your personal data from accidental loss and from unauthorized access, use, alteration, and disclosure. Any payment transactions will be encrypted using SSL technology. Your credit card information is handled by a trusted third party and is not entered, transmitted, stored, or received on or by Our Company’s servers at any point during an online ordering process.

Unfortunately, the transmission of information via the Internet is not completely secure. Although We do Our best to protect your personal data, We cannot guarantee the 100% security of your personal data transmitted to Our Website. Any transmission of personal data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

**Retention: How Long We Keep Your Personal Data**
We only retain your personal data as required to complete the processing We have disclosed in this Notice. We also retain a record of the IP address, country, and timestamp of acknowledgement for EU visitors acknowledging their consent to this Notice.

**Marketing: What We Would Also Like to Do with Your Personal Data**
With your consent, We would like to use your name and email address to inform you about future programs and services. This contact information is not shared with third parties or used for other purposes, and you can unsubscribe from any such marketing via the unsubscribe option in any such marketing email you receive from us. Please indicate below if you would like to opt-in to such communications from CHMC.

**What are your rights?**
You can exercise any of the following rights by directly making changes in Our Website or notifying us as described below.

* Access: You can access and verify what personal data Our Website currently contains by logging into Our Website and visiting your account profile page. You may also email us at cme@cchmc.org to request a copy of the personal data Our Website currently contains.
* Correction or Rectification: You can correct what personal data Our Website currently contains by logging into Our Website and visiting your account profile page. You may also email us at cme@cchmc.org to request that We correct or rectify any personal data that you have provided to us. 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. Where applicable, CHMC will ensure such changes are shared with any trusted third parties.
* Restrict Processing: When applicable, you may restrict the processing of your personal data within Our Website by submitting a request via email to cme@cchmc.org. In your email, please explain how you wish CHMC to restrict processing of your personal data. When such restrictions are not possible, CHMC will advise you accordingly. You can then choose to exercise any other rights under this Notice, to include withdrawing your consent to the processing of your personal data. Where applicable, CHMC will ensure such changes are shared with any trusted third parties.
* Object to Processing: When applicable, you have the right to object to the processing of your personal data by submitting a request via email to cme@cchmc.org. When such objections are not possible, CHMC will advise you accordingly. You can then choose to exercise any other rights under this Notice, to include withdrawing your consent to the processing of your personal data. Where applicable, CHMC will ensure such changes are shared with any trusted third parties.
* Portability: Upon request, and when possible, CHMC can provide you with copies of your personal data. You may submit a request via email to cme@cchmc.org. When such a request cannot be honored, CHMC will advise you accordingly. You can then choose to exercise any other rights under this Notice, to include withdrawing your consent. Where applicable, CHMC will ensure such changes are shared with any trusted third parties.
* Withdraw Consent: At any time, you may withdraw your consent of Our Company’s processing of your personal data through this Website by notifying us via email at cme@cchmc.org. Using the same email address associated with your Website account, simply type the words “GDPR - WITHDRAW CONSENT” in the subject line of your email. Upon receipt of such a withdrawal of consent, CHMC will confirm receipt, proceed to stop processing your personal data, and direct you to the GDPR Personal Data Removal Request webpage, where you can submit your request for erasure as explained below. Where applicable, CHMC will ensure such changes are shared with any trusted third parties.
* Erasure: If you should wish to cease use of Our Website and have your personal data deleted from Our Website, please notify CHMC at the email address below. CHMC will confirm receipt and erase your personal data. Where applicable, CHMC will ensure such changes are shared with any trusted third parties.
* Submit Complaints or Questions: If you wish to raise a complaint on how We have handled your personal data, you can contact us as described below. If you reside in a E.U. member state, you may also file a complaint with the supervisory authority in your country.

**Will this Notice Change?**
If We make material changes to how We process your personal data, We will notify you by email to the email address specified in your Website account, or through a notice on Our Website.

**How Can I Get Help?**
Questions or concerns about this Notice and Our processing of your personal data can be directed to: cme@cchmc.org

 By checking this box, I acknowledge that I have read this Notice and affirmatively consent to the processing of my personal data as described in this Notice.

 By checking this box, I ask that you please sign me up to receive details about future program and service offerings from Cincinnati Children’s.