

AMERICAN COLLEGE  
of RHEUMATOLOGY  
*Empowering Rheumatology Professionals*

## General Privacy Policy

The American College of Rheumatology (hereinafter “ACR”, “the “Society”, “we”), is a professional membership organization based at 2200 Lake Boulevard, NE, Atlanta, Georgia 30319, committed to improving the care of patients with rheumatic disease and advancing the rheumatology specialty.” Founded in 1934, we are a not for profit, global medical society that serves physicians, health professionals, and scientists worldwide and our mission is to advance research and training to improve the health of people with rheumatic diseases. [Learn more about the ACR.](#)

You can contact us at:  
2200 Lake Boulevard NE  
Atlanta, GA 30319  
Phone: 404-633-3777  
Fax: 404-633-1870

This Privacy Policy details how we are processing personal data, including personal data of individuals in the European Union (EU), the European Economic Area (EEA), and United Kingdom when they interact with our services.

In principle, ACR:

- Collects, uses and stores the minimum amount of personal data that is necessary for one or more legitimate business purposes and to comply with legal obligations.
- Limits who has access to the personal data in our possession to only those who need it for a legitimate business purpose.
- Protects personal data through physical and technical security measures tailored to the sensitivity of the personal data we hold.
- Communicates with our employees, customers, suppliers, business partners and others about how we intend to use personal data in our day-to-day operations.
- Takes reasonable steps to ensure our personal data is accurate and up-to-date.
- Integrates privacy in the design of our activities and projects that involve the use of personal data.

If you are based in the EU, EEA, or United Kingdom and you are interacting with the ACR in the context of us providing services or goods to you, or us monitoring your use of our services, then the related processing of your personal data is governed by the General Data Protection Regulation (GDPR) and its implementing national laws. We are controller of the processing of your personal data. If you have any questions or inquiries, contact us at [privacy@rheumatology.org](mailto:privacy@rheumatology.org).

## **Types of Information Collected**

**We recognize personal data as any information related to an identified or identifiable individual. Depending on the context of your interactions with ACR, we collect and use different types of personal data from website visitors, members and others that interact with us.**

### **Types of information we collect:**

- **For our app:** Name, email address, password, country of residence, time zone, app language, postal code, the state of the device (on, off, standby, battery required), logins, account configurations, linking to nutritionist and physicians, errors, push notifications received, email notifications received, IP address. We may also process street and billing addresses or phone number, if the user provides it.
- **Membership accounts on our website:** name, email address, log activity, country of residence, professional affiliation, ABIM number and year of certification, memberships or fellowships information to verify applications for membership.
- **Registration to events, conferences and the annual meeting:** name, affiliation, contact details, accommodation preferences, and payment details.
- **Marketing activities:** email addresses and information about the interaction with our communications (such as IP addresses, click-through data). We may also send surveys and collect various responses to these surveys which may include contact and professional information. These surveys may be sent directly from us or from an approved business partner. We do not send independent surveys on behalf of members or third parties.
- **Gallery of videos and photos:** We have a gallery of videos publicly available and some of them include presentations and testimonies of persons that have pre-authorized us to share these artifacts. We also share some before and after photos and information that has been provided by our different physicians and members with the appropriate authorizations.
- **Career Connection:** name, contact information, password, resume, preferred employment types/disciplines/specialties/locations, work authorization (visa or other document).
- **Information collected automatically:** there is other information that we collect automatically when you visit our site through the use of cookies or similar technologies such as your IP address, browser type, access times. See our Cookies Notice for more information.
- **Our courses:** name, affiliation, grades, credits toward certifications.

## **Why we process your personal data**

**The purposes for which we collect and use your personal data may vary depending on the type of relationship you have with us, such as if you are one of our members or a website visitor.**

See below why we use your information:

- We process personal data collected through our **mobile app** for the purpose of facilitating communication with our members.
- We process personal data of our members when they log into their online accounts for the purpose of managing their **membership** and providing them membership related services.
- We process personal data in the context of article/abstract submissions for the purpose of **publication** of cutting edge research in the field of rheumatology.
- We process personal data of individuals who subscribe to our **courses** for the purpose of providing educational services
- We process personal data of **participants to our events** for the purpose of organizing the event/conference.
- We process personal data in the context of **marketing** activities for the purposes of marketing our services and of communicating with our members. In order to keep our members and others who interact with the ACR informed of important ACR activities, services, and news pertaining to the rheumatology field, we send out certain marketing emails and publications. In order to better serve our constituents needs and target communications to their preferences, we collect information about their use of these communications.
- We process personal data in the context of the **gallery of videos and photos** that we maintain, for the purposes of informing the public about different cases related to rheumatology.
- We process personal data for the “**Career Connection**” page on our website in order to match candidates with jobs in our field of activity.
- We process personal data collected through **cookies** placed by our website to support the operation of our website and to analyze the traffic patterns on our site.
- We process personal data of individuals that support or provide professional services to ACR including speaker **payment**, information includes their SSN/TIN, and bank details.

## **Our Policy Towards Children**

### **Our services are not directed to children.**

We do not knowingly collect personal data from children. We may incidentally process personal data of children, for instance where participants to our events travel with family or when images we capture for our gallery of videos are those of conditions suffered by children. If a parent or guardian becomes aware that his or her child has provided us with personal data without their consent, please contact us. If we become aware that a child has registered for our services and has provided us with personal data without the consent of their parent or guardian, we will delete such information from our files.

## **Disclosures to Third Parties**

**At times, ACR engages third party contractors, service providers, and other vendors to help us accomplish our business objectives. There are other circumstances where we are required by law to disclose personal data to third parties such as public bodies or judicial authorities.**

We engage with our agents, representatives, contractors, service providers or other third parties for the following services:

- Authorization of credit card transactions (based in the US),
- Order fulfillment (based in the US);
- Cloud storage (based in the US);
- Email blasting (based in the US);
- Mailing services for our journals;
- Software for conference registration and abstracts submission;
- Mobile apps for connection to ACR and online courses;
- Surveys for ACR research purposes.

If the engagement involves the transmission of personal data, we require the service provider to treat that data consistent with this Policy. A contract to protect the personal data is executed before any data is disclosed, if that vendor will process personal data of individuals in the EU, EEA, or United Kingdom on our behalf.

ACR may also disclose information in special cases when it has a good-faith belief that such action is necessary to: (a) conform to legal requirements or comply with legal process; (b) protect and defend our rights or property; (c) enforce the College's policies regarding online privacy, internal and external linking, and copyright and; or (d) act to protect the interests of our users or others.

Occasionally ACR may be required by law enforcement or judicial authorities to provide personally identifiable information to the appropriate governmental authorities. We will disclose such information upon receipt of a court order, subpoena, or to cooperate with a law enforcement investigation. ACR reserves the right to report to law enforcement agencies any activities that we in good faith believe to be unlawful.

## **Your European Privacy Rights**

**If you reside or otherwise find yourself in the European Union, the European Economic Area (EEA), or the United Kingdom, ACR is committed to processing your personal data lawfully and facilitating the exercise of your rights granted by the European data protection law. You can [contact](#) us at any time to discuss your privacy concerns.**

**Legal basis for data collection and use:** we only collect and use personal data when there is a fair and legal basis for its collection and use and/or when you have consented to our collection. For example, we collect personal data because it is necessary to become member of the College, to meet our legitimate interests to send marketing material, or to comply with legal obligations. See below the legal basis for each collection:

- **Our Mobile app:** Collection is based on our legitimate interest in providing services to our members

- **Membership information and payment details:** Collection is based on the necessity to enter into, or for the performance of, a contract and to provide you membership services and process or receive payments;
- **Account management and cookies:** Collection is based on our legitimate interest in facilitating access to different services to our members, and to analyze traffic patterns.
- **Publications of articles and submissions:** we publish cutting edge research in the field of rheumatology submitted by health professionals, based on our legitimate interest in advancing research to improve the health of people with rheumatic diseases.
- **Registration to events, conferences, courses and the annual meeting:** Collection is based on the necessity to enter into, or for the performance of, a contract and to put on the event for all attendees;
- **Marketing activities:** Collection is allowed where you provide consent for email marketing, and collection for marketing conducted other than through email or phone call is based on our legitimate interests;
- **Gallery of videos and photos:** Collection is allowed where you consent;
- **Career Connection:** Collection is allowed where you consent.

### **Privacy rights under the European regulation:**

**Transparency and the right to information:** We provide notice to our members, website users and other third parties who interact with us about how we use personal data in our day-to-day activities at the time of collecting personal data, or as soon thereafter as possible. We also publish this privacy notice for greater transparency.

**Right to access, rectification, restriction of processing, erasure, and data portability:** If you are based in the EEA or United Kingdom we provide you with access to your own personal data. In addition, when requested in writing by you, we will rectify any errors in your personal data when it is incorrect or inaccurate, and we will ensure the right to erasure, portability and to restriction of processing when these rights are not incompatible with other legal obligations.

**Right to object and withdraw consent at any time:** for all marketing materials, you can opt-out anytime, and free of charge. The right to object for other processing activities will be balanced to ensure that it is not incompatible with local regulations or our legitimate interests.

These requests should be submitted as follows:

- **Opt-out of marketing communications:** you can exercise your right to object and opt-out anytime by following the opt-out instructions in our commercial emails, by logging into your ACR account and changing your communication preferences or contacting us at [privacy@rheumatology.org](mailto:privacy@rheumatology.org). You will still continue to receive emails relevant to course registrations or purchases (e.g. registration confirmations or purchase receipts) or necessary to your continued membership in the ACR (e.g. dues notices). If you believe that SPAM has been sent from us, please contact us at [privacy@rheumatology.org](mailto:privacy@rheumatology.org) so that we can investigate and rectify the situation.
- **To exercise the rest of your rights:** you should send a communication in writing to [privacy@rheumatology.org](mailto:privacy@rheumatology.org). In order to fulfill this request, we may require you provide

us information to validate your identity and specify your request. We will attend to your request in a timely manner within 30 days after receiving your request. If for any reason we need to extend this period of time, we will contact you.

If you are not satisfied with our response, you have the right to lodge a complaint with the supervisory authority of your habitual residence, place of work or place of the alleged infringement.

## **International Transfers of Personal Data**

**If you are located outside the United States and you interact with our website or provide us personal data, then your personal data may be transferred to the United States.**

We transfer your personal data to the United States whenever you interact with us. The US has not sought, nor obtained adequacy status from the European Union. The EU-US Privacy Shield framework obtained an adequacy decision. The level of protection of your personal data is not deemed equivalent to the one in the EU, unless the receiving organization is self-certified under the EU-US Privacy Shield. As a not-for-profit organization, we are not able to adhere to the EU-US Privacy Shield Principles.

We transfer your personal data on the basis of the derogations in Article 49 GDPR, particularly:

- **Explicit consent**, for newsletter subscribers and certain processing in relation to organizing events - such as storing photos;
- **Necessity to enter and for the performance of a contract** for registration information to participate to our events; for processing personal data of our members to maintain their relationship with our organization, provide them services including when they log in to their member accounts; and also for processing personal data for online and offline courses.

As for safeguards to your personal data, we directly apply the GDPR provisions to your personal data. As a matter of principle, we do not engage in any onward transfers regarding your data, beyond the access that our processors have to your data. We select carefully our processors and we require that they are EU-US Privacy Shield certified, or that they provide equivalent safeguard mechanisms.

## **Data Security**

**ACR is committed to the security, confidentiality and integrity principle. We take commercially reasonable precautions to keep all information obtained from our online visitors secure against unauthorized access and use and we periodically review our security measures.**

We care about the security of your transactions and apply industry-standard practices of like organizations and technologies to safeguard your credit card information. We use high-grade encryption and the secure https protocol to communicate with your browser software, which

mitigates the risk of interception of the credit card information you give us. We also employ several different security techniques to protect your personally identifiable information from unauthorized access by users inside and outside the organization. The Web servers for the College are located in a secure environment, and computer systems are maintained in accordance with industry standards of like organizations to secure information. You should be aware, however, that “perfect security” does not exist on the Internet, and third parties may unlawfully intercept or access transmissions or private communications. We encrypt the transmission of personal information using secure socket layer technology (SSL).

This site contains links to other sites. While ACR strives to link only to sites that share our high standards and respect for privacy, ACR is not responsible for the privacy practices employed by other sites.

### **Retention Periods**

**ACR applies the storage limitation principle in order to retain personal data in our records only for the length of time required to fulfill the purpose for which the data was collected.**

We only keep personal data in our records as long as they are necessary for the purposes they have been processed. The retention period depends on the context in which we process data and on specific circumstances such as regulations requiring retaining information for a certain period of time. These circumstances may include local laws, the reasonably anticipated future business needs for the data, the benefit to the user to have the data available, legal requirements to hold the data, or similar circumstances.

### **Disclaimer**

ACR MAKES NO CLAIMS, PROMISES OR GUARANTEES ABOUT THE ACCURACY, COMPLETENESS OR ADEQUACY OF THE CONTENTS OF ITS SITE, AND EXPRESSLY DISCLAIMS LIABILITY FOR ERRORS AND OMISSIONS IN THE CONTENTS OF THIS SITE. NO WARRANTY OF ANY KIND, IMPLIED, EXPRESSED OR STATUTORY, INCLUDING BUT NOT LIMITED TO THE WARRANTIES OF NON-INFRINGEMENT, TITLE, MERCHANTABILITY, FITNESS FOR A PARTICULAR PURPOSE AND FREEDOM FROM COMPUTER VIRUS, IS GIVEN WITH RESPECT TO THE CONTENTS OF THIS WEBSITE OR ITS HYPERLINKS TO OTHER INTERNET RESOURCES. REFERENCE IN THIS WEBSITE TO ANY SPECIFIC COMMERCIAL PRODUCTS, PROCESSES OR SERVICES, OR THE USE OF ANY TRADE, FIRM OR CORPORATION NAME IS FOR THE INFORMATION AND CONVENIENCE OF THE PUBLIC AND DOES NOT CONSTITUTE ENDORSEMENT OR RECOMMENDATION BY ACR.

### **Changes to this Policy**

**We reserve the right to modify this Privacy Policy at any time. We will duly inform you of any changes.**

ACR may occasionally update this privacy statement and other statements referenced by it as new services and programs are introduced. You will be notified of these changes via [privacy@rheumatology.org](mailto:privacy@rheumatology.org) and/or by placing a prominent notice on the Site. The time stamp you see on the policy will indicate the last date it was revised.

*Updated March 7, 2019*