

Privacy Notice

European Union & United Kingdom Residents

Effective Date: May 25, 2018

The Eastern Association for the Surgery of Trauma (“EAST”, “we”, “us”, or “our”) respects your privacy and is committed to protecting it through our compliance with this Privacy Notice. This Privacy Notice describes the categories of Personal Data we may collect and process from European Union (“EU”) and United Kingdom (“UK”) residents online and offline, and Personal Data (defined below) we receive about EU and UK residents from third-parties.

Please read this Privacy Notice carefully to understand our policies and practices regarding how we will treat your Personal Data. If our policies and practices regarding your Personal Data change, we will update this Privacy Notice.

1. WHAT PERSONAL DATA WE COLLECT ABOUT YOU

The categories of Personal Data we may collect about you are:

- **Identity Data** including first name, maiden name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** including address, email address and telephone number.
- **Financial Data** including bank account and payment card details.
- **Transaction Data** including details about payments to and from you and other details of products and services you purchase from us.
- **Technical Data** including internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** including your username and password on our website, your purchases or orders, your area of medical specialty, mailing and email preferences, and annual scientific assembly attendance history, and the name of your spouse/partner.
- **Usage Data** including information about how you use our website, products and services.
- **Marketing and Communications Data** including your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Photograph and Recordings Data** including photographs, video and audio recordings in which you are identifiable.
- **Health Data** in particular information you provide us in connection with your request for a dietary or accessibility accommodation.

We also process aggregated data, which is data derived from your Personal Data for statistical purposes. Aggregated data is not considered Personal Data because it does **not** directly or indirectly reveal your identity. We are not required to maintain, acquire, or possess information to identify you in all circumstances. This Privacy Notice does not restrict our collection and processing of aggregated data. However, if we combine or connect aggregated data with your Personal Data so it can directly or indirectly identify you, we treat the combined data as Personal Data, which will only be processed in accordance with this Privacy Notice.

Data We Do Not Collect. Except as provided below, we do not collect any Special Categories of Personal Data (as defined by the GDPR) about you (i.e., details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

If you request an accommodation because of your health or a disability at an EAST sponsored event, we may need some information regarding your health to assess your request and possible accommodations. Whether you provide this information is your choice and we will only collect this information with your consent. We do not collect any information about your health from anyone other than you.

Our services, products, and events are not offered directly to children. However, we occasionally process the Personal Data of children under age 16 to enable children to attend our Annual Scientific Assembly accompanied by a responsible adult. When applicable, we collect children's Personal Data only from adults responsible for the children, and we only collect enough Personal Data necessary to enable children to attend a given event. In particular, we only collect the names and ages of children. We do not collect Personal Data directly from children under age 16. We destroy the personal data of children after the event. We do not process children's data for purposes of marketing or creating personality or user profiles.

We do not collect any information about criminal convictions and offenses.

2. HOW WE COLLECT YOUR PERSONAL DATA

As discussed in this Section, we use different methods to collect your Personal Data:

Data You Provide Us. You may give us your Personal Data both online and offline by submitting forms to us, or by corresponding with us, through our website (i.e., east.org), email, phone, or other means. For example, you may provide us Personal Data when you:

- register for membership;
- register for our events;
- purchase our products or services;
- create an account on our website;
- subscribe to our publications;
- request marketing materials from us;
- enter search queries on our website;
- complete a survey provided by us;
- submit scientific abstracts and video abstracts to us;
- submit articles to us for publication in our publications;
- present at an EAST sponsored event;
- contact us;
- provide it to us at an event or meeting; or
- provide us with feedback.

You may also provide information to be published or displayed (collectively “**post**” or “**posted**”) on various areas of our website, or transmitted to other users of our website or third parties (collectively “**User Contributions**”). All areas of the website in which User Contributions are posted should be considered public and not confidential, even if those areas are limited to a particular audience. Once you post a User Contribution, you should assume everyone in the world can see it and will have access to it and you will be unable to delete or revise it. In addition, we have no control over what other users of the website may do with your User Contributions. Accordingly, you should not post anything you wish to keep confidential or are required by law or otherwise to keep confidential. **YOU ARE SOLELY RESPONSIBLE FOR WHAT YOU POST AND FOR THE CONSEQUENCES OF YOUR USER CONTRIBUTIONS POSTED ON OUR WEBSITE.**

Data We Collect Through Automatic Data Collection Technology. As you navigate through and interact with our websites, we may use automatic data collection technology to collect certain information about you, your equipment, and your browsing actions and patterns, including: (i) whether you are a new or existing user; (ii) content viewed; (iii) frequency, duration, and date of content viewed; (iv) your searches; (v) your IP address; (vi) your operating system; (vii) your device type; (viii) your network; (ix) your browser type; and (x) your server connection speed.

The information we collect automatically helps us improve our websites, and deliver a better and more personalized service by enabling us to:

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

The technology 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 websites. Unless you have adjusted your browser setting so it will refuse cookies, our system will issue cookies when you direct your browser to our websites.
- **Web Beacons.** Pages of our website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages, or opened an email, and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

Third parties or publicly available sources. We may process your Personal Data that is collected from various third parties and public sources, as follows:

| Categories of Personal Data Collected | Third-Party Sources |
|---|---|
| Identity and Contact Data | Employer (e.g., where you are an employee of an organization with whom we contracted and that organization lists you as their contact for the contract) |
| Identity and Contact Data | Contractors we engaged to collect information from you on our behalf. |
| Identity, Contact, Profile and Financial Data | Individuals who register you for EAST membership or for an EAST event |
| Identity, Contact and Profile Data | Co-authors who submit abstracts or articles for which you are a co-author |

3. HOW WE PROCESS YOUR PERSONAL DATA

After collecting your Personal Data, we **process** it in one or more ways. Processing includes operations performed on Personal Data, including collecting, recording, organizing, structuring, storing, altering, retrieving, consulting, using, disclosing, restricting, erasing or destroying the same.

We will only process your Personal Data when we have a lawful basis to do so. Most commonly, we will process your Personal Data in the following circumstances:

- Where processing is necessary for the performance of a contract we have with you, or in order to take steps at your request prior to entering into a contract with you;
- Where processing is necessary for the purpose of our legitimate interests, except where our interests are overridden by your interests or fundamental rights and freedoms;
- Where processing is necessary for our compliance with a legal obligation; or
- Where you provide consent to the processing for specific purposes.

Purposes For Which We Will Process Your Personal Data. The following table depicts how we may process your Personal Data, and the lawful bases upon which we rely. As noted below, we may rely on different lawful bases to process your Personal Data.

| Purpose/Activity | Personal Data Categories | Lawful Basis for Processing, Including Basis of Legitimate Interest |
|---|--|--|
| To provide you with contracted products or services | Identify Data Contact Data Financial Data Transaction Data | Contract |
| Marketing our goods and services to you | Identify Data Contact Data Marketing and Communications Data | Legitimate Interest (marketing our goods and services to individuals with whom we have an existing relationship to advance our organization and its purpose) |
| To share your personal data with other organizations and individuals to contact you about their goods and services. | Identity Data Contact Data Marketing and Communications Data Profile Data | Consent |

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|--|--|--|
| To enable you to complete a survey | Identity Data Contact Data Profile Data Usage Data Marketing and Communications Data | Legitimate Interest (to study how customers use our products/services, to develop them and grow our organization) |
| To analyze how individuals use our products/services to develop them and to advance our organization and its purpose | Identity Data Profile Data Transaction Data Usage Data Technical Data | Legitimate Interest (to study how individuals use our products/services, to develop them and to advance our organization and its purpose) |
| To maintain a historical record of our events and activities | Identity Data Contact Data Transaction Data Photograph and Recordings Data | Legitimate interest (to maintain a historical record of our events and activities) |
| To report on our events and activities | Identity Data Contact Data Photograph and Recordings Data | Legitimate interest (to report on our events and activities; promote our events and activities, our organization and its purpose; and maintain a historical record of our events and activities) |
| To promote our organization, its purpose, and its events and activities | Identity Contact Profile Usage Technical Photograph and Recordings | Legitimate interest (to promote our organization, its purpose, and its events and activities to individuals with whom we have a relationship) |
| To record (audio and/or video) content for future distribution by EAST | Identity Data Contact Data Photograph and Recordings Data | Consent |
| To enable you to volunteer for EAST | Identity Data Contact Data Profile Data | Legitimate Interest (to advance and promote our organization, its purpose, and its events and activities with the assistance of volunteers) |
| To facilitate networking between our members and other individuals involved in our events and activities | Identity Data Contact Data Profile Data | Legitimate Interest (facilitate networking between our members and other individuals involved in our events and activities) |
| To enable you to provide contracted products or services to us | Identity Data Contact Data Transaction Data | Contract |
| To enable your employer to provide contracted products or services to us | Identity Data Contact Data | Legitimate Interest (to receive products or services to advance our organization, its purpose, and its events and activities) |
| To enable you to provide us content, including a presentation or article | Identity Data Contact Data Transaction Data | Contract |
| To enable you to submit abstracts for presentation or manuscripts for publication | Identity Data Contact Data Profile Data Technical Data | Contract |

| | | |
|---|---|---|
| To enable us to use and publish the content you provide us | Identity Data Contact Data Profile Data Photographs and Recordings Data | Contract |
| To enhance performance of the EAST website and personalize your experience on the website through the use of cookies | Technical Data | Legitimate Interest (to enhance performance and personalize your experience on EAST website) |
| To assess your request for accommodations based on your health or a disability | Health Data | Consent |
| To request your consent, if the lawful basis for processing your personal data is consent | Identity Data Contact Data Profile Data | Legitimate interest (obtain consent, when necessary, for processing of personal data from individuals with whom we have a relationship) |
| To manage our relationship with you, including changes to our policies, including this privacy notice | Identity Data Contact Data | Legal |
| To administer our website (including troubleshooting, testing, system maintenance, support, reporting and hosting of data) | Identity Data Contact Data Technical Data | Legitimate interest (operating our organization and necessary IT services and network security) |
| To comply with legal requirements | Identity Data Contact Data Financial Data Transaction Data Technical Data Profile Data Usage Data Marketing and Communications Data Health Data | Legal |
| To enforce the terms and conditions of our agreements and policies; defend against legal action taken against us or our affiliates; protect our rights, security, property, and operations, and the rights, security, property and/or operations of our affiliates, you or others | Identity Data Contact Data Financial Data Transaction Data Technical Data Profile Data Usage Data Marketing and Communications Data Health Data | Legitimate Interest (operating our organization) |

Processing For Contracts. In order for us to perform a contract to which you are a party, we may need to process your Personal Data. If you fail to provide us Personal Data necessary for us to perform a contract, we will be unable to provide the products or services under the contract. However, our performance of a contract, including the provision of a service, will never be conditioned on your consent to the processing of your Personal Data that is not necessary for the performance of the contract.

Change of Purpose. If we decide to process your Personal Data for a purpose other than that for which it was collected, we will provide you, prior to further processing, additional information regarding the new purpose to ensure the Personal Data is processed fairly and transparently and in accordance with applicable law.

4. TO WHOM YOUR PERSONAL DATA IS DISCLOSED

We may provide your Personal Data to the following third-parties:

- Our employees;
- Our third-party service providers who provide services to us, including: meeting registration; continuing medical education; payment processing; distribution of postal or email communications; photography, video and audio recording; and webinars.
- A successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other transfer of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceedings;
- Third-parties to market their products or services to you, if you consent; and/or
- Government authorities and other persons, to the extent required by applicable law.

5. IN WHAT COUNTRIES IS YOUR PERSONAL DATA PROCESSED

Your Personal Data may be processed in the following countries which the European Commission determined either do or do not have adequate data privacy safeguards.

| Country | Adequate Data Privacy Safeguards |
|----------------|---|
| USA | No |

6. HOW WE SECURE YOUR PERSONAL DATA

Taking into account the state of the art, costs of implementation, nature, scope, context and purpose(s) of processing, as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, we implement appropriate technical and organizational measures to ensure a level of security appropriate to the risk. Unfortunately, the transmission of information via the internet is not completely secure, but we do our best to protect your Personal Data.

7. HOW LONG WE STORE YOUR PERSONAL DATA

We will retain your Personal Data for as long as necessary to fulfil the purposes for which we collected it; including to satisfy any legal, accounting, or reporting requirements. To determine the appropriate retention period for Personal Data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some instances, you may ask us to delete your Personal Data. For more information, see *Request Erasure of your Personal Data* below for further information.

In some instances, we may anonymize your Personal Data (so it can no longer be associated with you) for research or statistical purposes; in which case, we may use this information indefinitely without further notice to you.

8. WHAT ARE YOUR PERSONAL DATA LEGAL RIGHTS

You have certain rights with respect to your Personal Data under the General Data Protection Regulation (GDPR). **See 10. Glossary, Your Legal Rights below.**

How to exercise your rights:

- You can always Contact Us to exercise your legal rights. **See 11. How to Contact Us below.**
- In connection with certain communications from us, we may provide you with a mechanism to opt-out of receiving similar communications from us in the future.
- In some instances, we may provide you with an online portal through which you can make certain choices about how we process your Personal Data.
- As discussed above, with respect to cookies, 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.
- You have the right to lodge a complaint with an appropriate supervisory authority if you believe our processing of your Personal Data is inconsistent with the requirements of applicable law.

Usually, There Is No Fee Required To Exercise Your Personal Data Rights. You will not have to pay a fee to exercise your rights, nor is the purchase of products or services a condition for you to exercise your rights. You are also entitled to receive a copy of your Personal Data undergoing processing. However, if in exercising your rights, your request is unfounded, repetitive or excessive, we may charge reasonable fees taking into account the administrative costs of providing the information or taking the requested action. We may also refuse to act on the request. If you request more than one copy of your Personal Data, we may also charge you reasonable fees based on our administrative costs to provide you copies.

What We May Need From You. When we have reasonable doubts concerning the identity of an individual making a request to exercise his/her rights, we may request additional information necessary for us to confirm the requestor's identity.

Our Response. Within one month of receiving a request to exercise your rights, we will perform the requested action and/or acknowledge your request. If, based on the complexity and number of your requests or if we require additional time to verify the accuracy of your Personal Data, we require more than one month to perform the requested action, we will inform you that we require additional time and provide the reasons additional time is necessary. If your request to us is by electronic means, we will respond by electronic means, unless you request that we respond in a different manner.

If we refuse to perform any requested action because doing so would be inconsistent with applicable law, this Privacy Notice, or for any other reason, we will provide you an explanation for our refusal.

9. WHAT PRIVACY PRACTICES APPLY TO THIRD-PARTY LINKS ON OUR WEBSITE

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control third-party websites and are not responsible for their privacy practices. If you would like to know about a particular website's practice, we encourage you to read their privacy notice.

10. GLOSSARY

YOUR LEGAL RIGHTS

You have the Legal Right to:

Request access to your Personal Data. This enables you to be informed whether we are processing your Personal Data, and if we are, receive access to the Personal Data and the following information: (i) the purpose of the processing; (ii) the Personal Data categories; (iii) the recipients or categories of recipients to whom the Personal Data have been or will be disclosed - in particular, recipients in third countries or international organizations; (iv) where possible, the envisaged period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period; (v) the existence of the right to request from us rectification or erasure of Personal Data or restriction of processing of Personal Data concerning you or to object to such processing; (vi) the right to lodge a complaint with a supervisory authority; (vii) where your Personal Data is not collected from you, any available information as to the source of your Personal Data; and (viii) the existence of automated decision-making, including profiling, referred to in GDPR Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for you.

Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected and submit a supplementary statement to us.

Request erasure of your Personal Data. This enables you to ask us to erase Personal Data when : (i) processing the Personal Data is no longer needed for the purposes for which it was collected or otherwise processed; (ii) the Personal Data was obtained based on consent, and we possess no other legal ground for processing; (iii) the Personal Data was processed based on our legitimate interests, and there are no overriding legitimate grounds for processing; (iv) the Personal Data is processed for direct marketing purposes; (v) the Personal Data has been unlawfully processed; or (vi) the Personal Data must be erased to comply with our legal obligation. Note, however, we may not be able to comply with your request of erasure for specific legal reasons, which reasons will be communicated to you, if applicable, in response to your request.

Object to processing of your Personal Data. This enables you to object to the processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your situation that makes you feel the processing impacts your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your Personal Data which override your interests, rights, and freedoms.

Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios if: (i) you want us to establish your Personal Data's accuracy; (ii) our processing of your Personal Data is unlawful but you do not want us to erase it; (iii) you need us to hold Personal Data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (iv) you objected to our processing of your Personal Data but we need to verify whether we have overriding legitimate grounds to process the same.

Request the transfer of your Personal Data. We will provide you, or a third party you chose, your Personal Data in a structured, commonly used, machine-readable format. Note this right only applies to automated information you initially provided consent for us to process or where we used your Personal Data to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your Personal Data. This enables you to withdraw your consent to process your Personal Data. However, your withdrawal of consent does not affect the lawfulness of any processing carried out before the withdrawal.

11. HOW TO CONTACT US

We are the controller and are responsible for your Personal Data that we process. If you have any questions about this Privacy Notice, including any requests to exercise *Your Legal Rights*, please contact us at:

The Eastern Association for the Surgery of Trauma
Christine C. Eme, CAE, CMP Executive Director
633 N Saint Clair Street, Suite 2400
Chicago, IL 60611-3295
mangagementoffice@east.org

Provided we can confirm your identity, we will also provide information regarding your rights over the phone if you contact us at (312) 202-5508.