



Albert Einstein College of Medicine

# Website Privacy Policy

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## I. Purpose

Your privacy is a serious matter to us. This Privacy Policy explains, in general, what personal information and other information is collected on our Site, how the information is used, and with whom we may share such information. Please take a few minutes to read our Privacy Policy so that you understand how Einstein treats your information.

This Policy governs the use of the Albert Einstein College of Medicine (“Einstein”) network of websites (collectively referred to as the “Site”). This Policy also describes our practices in connection with personal information that we collect through the Site.

## II. Scope

This Policy applies to all Einstein and Einstein-related websites and webpages.

## III. Policy

### III.A. General

By visiting the Site, you agree to the terms of this Privacy Policy as they may be amended from time to time. This Privacy Policy is incorporated into, and part of, the Site’s Terms and Conditions which also governs your use of the Site.

This Privacy Policy does not apply to information that you may provide to us, or that we may obtain, other than through our Site, such as by phone, through postal mail and through other live and print media.

In addition, to the extent that you submit any personal information to any third party (for example, via a third-party software application or service that is included in the Site), the third party’s collection, use and disclosure of such information may be governed by its privacy policy, and not by our Privacy Policy.

Einstein is not responsible for the information collection, usage and disclosure practices of third parties.

### III.B. Family Educational Rights and Privacy Act

Einstein’s [FERPA Policy, OGC-POL-2018-006](#), complies with the Family Educational Rights and Privacy Act (aka “FERPA”).

### III.C. Data Collection

In order to make your use of our Site as worthwhile as possible, we may gather three basic types of information through the Site: Personal Information, non-personal information, and Internet Protocol Addresses.

#### III.C.1. Personal Information

Personal information is any information that identifies you as an individual and includes, for example, name; address; photos; e-mail address; telephone, wireless and/or fax number; short message service or text message address or other wireless device address; instant messaging address; or credit card number.

We collect personal information from users of our Site, through users' activities, transactions and completion of online forms such as when users register or subscribe for accounts or features on our Site, make online donations, order event tickets, complete surveys, join online communities, create profile pages, upload photographs, contribute to open forums that we may make available on or through our Site, submit a comment or question to us using a "contact us" or similar feature on our Site, send us an e-mail, or in any other way submit personal information to us via our Site.

You do not have to provide personal information to use the Site. However, in order for you to take advantage of particular opportunities provided through the Site, we may require that you provide personal information.

### III.C.2. Non-Personal Information

When you visit and interact with the Site, Einstein and its third-party service providers may collect non-personal information (for example, a catalog of Site pages you visit). Non-personal information is generally collected through the Site from different sources: (a) cookies; (b) clear GIFs and similar technologies; (c) environmental variables; and (d) information that you voluntarily provide.

#### III.C.2(a) Cookies

We and our service providers may use "cookies" to keep, and sometimes track, information about you. Cookies are small data files that are sent to your browser or related software from a Web server and stored on your computer's hard drive. Cookies are data that a web server transfers to an individual's computer for recordkeeping and other purposes. Cookies are an industry standard used by most websites and can facilitate users' ongoing access to and use of a particular website; cookies do not cause damage to your computer systems or files. If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies, or to be given the choice of declining or accepting the transfer of a particular cookie, or cookies from a particular website, to your computer. To learn more about cookies, please click <http://www.allaboutcookies.org/>.

#### III.C.2(b) Clear GIFs

We and our service providers may use "clear GIFs" (aka "Web beacons" or "pixel tags") or similar technologies, in the Site and/or in our communications with you to enable us to know whether you have visited a Web page or received a message. A clear GIF is typically a one-pixel, transparent image (although it can be a visible image as well), located on a Web page or in an e-mail or other type of message, which is used to, among other things, track the actions of Site users and e-mail recipients, to determine the success of marketing campaigns and to compile aggregate statistics about Site usage and response rates.

#### III.C.2(c) Environmental Variables

We and our service providers may also collect certain environmental variables, such as your MAC address, computer type (Windows or Macintosh), screen resolution, OS version, Internet browser, and Internet browser version. These environmental variables are collected by most Web sites and can be used to optimize your experience on the Site.

### III.C.2(d) Information That You Voluntarily Provide

Einstein also collects non-personal information (e.g., demographic information, your interests, your geographic location) when you voluntarily provide such information to us. This information is non-personal information because, unless combined with personal information, it does not personally identify you or any other user. Additionally, we may aggregate personal information in a manner such that the end-product does not personally identify you or any other user of the Site, for example, by using personal information to calculate the percentage of our users who have a particular telephone area code. Such aggregate information is considered non-personal information for purposes of this Policy.

#### **IP Address**

Our servers automatically collect data about your server's Internet address when you visit us. This information, known as an Internet Protocol address, or IP Address, is a number that's automatically assigned to your computer by your Internet service provider whenever you're on the Internet. When you request pages from our Site, our servers may log your IP Address and sometimes your domain name. Our server may also record the referring page that linked you to us (e.g., another Web site or a search engine); the pages you visit on this Site; the Web site you visit after this Site; other information about the type of Web browser, computer, platform, related software and settings you are using; any search terms you have entered on this Site or a referral site; and other Web usage activity and data logged by our Web servers.

We and our service providers use this information for internal system administration, to help diagnose problems with our server, and to administer our Site. Such information may also be used to gather broad demographic information, such as country of origin and Internet Service Provider.

### III.D. Use of Information

#### III.D.1. Personal Information

We will use the personal information you provide to our Site, for example, to fulfill your requests for our programs and services, to respond to your inquiries about our offerings, and to offer you other programs or services that we believe may be of interest to you. We sometimes use this information to communicate with you, such as to notify you when we make changes to our services, to fulfill a request by you, to process transactions or to contact you about your relationship with us. We may also use your personal information for internal business and record keeping purposes. We may send you notices (e.g., in the form of e-mails, mailings), and otherwise correspond with you, about programs and events, sponsored by us and others, that we think might interest you. You may opt out of receiving certain notices from us by following the instructions in the Choices section below.

#### III.D.2. Non-Personal Information

Because non-personal information does not personally identify you, we may use such information for any purpose. In addition, we reserve the right to share non-personal information with third parties for any purpose.

In some instances, we may combine non-personal information or IP Addresses with personal information (such as combining your name with your geographic location). If we do combine any non-personal

information or IP Addresses with personal information, we will treat the combined information as personal information as long as it is combined.

### **III.D.3. Shared Information**

#### **III.D.3(a) Public Forums**

When you contribute to a public area or feature of our Site, such as a chat room, community, bulletin board, list serve, personal Web page, calendar, news group, blog, wiki or other open forum that we may make available on or through our Site, the information that you submit may be made available to the general public. For this reason, we recommend that you exercise caution when submitting any sensitive information, including your full name, home address, phone number, other information that would enable other users to locate you, or financial information on these areas of our Site. Within many of these public forums, Einstein provides you privacy options that allow you to restrict the use and viewability of your personal information to others.

#### **III.D.3(b) Third-Party Offers**

We may provide visitors an opportunity to receive offers from other third-party entities that have services, products and offers that we think might be of interest to you. Unless you elect not to receive such offers by following the instructions in the Choices section above, we may from time to time provide your personal information to these entities so that they may send you these offers.

#### **III.D.3(c) Service Providers**

We may use third-party service providers to help operate our Site and provide services including but not limited to data analysis, payment processing, order fulfillment and other services of an administrative nature. We may share personal information about you with these third parties for the purpose of enabling them to provide services to you or to us (for example, if you choose to make a purchase through the Site, we may share your Payment Information or other personal information with our third-party service providers to fulfill your purchase, including, to process your credit card or payment account number or to ship products to you).

### **III.D.4. Legally Compelled Disclosures or Emergencies**

We may disclose personal information to others as we believe to be appropriate (a) where permitted or required by applicable law; (b) to comply with legal process; (c) to respond to requests from governmental or public authorities; (d) to enforce our Terms of Service; (e) to protect our operations; (f) to protect the rights, privacy, safety or property of Einstein, you or others; and (g) to permit us to pursue available remedies or limit the damages that we may sustain.

### **III.D.5. Assignment**

We reserve the right to transfer any and all information that we collect from Site users to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Einstein's operation or assets (including without limitation in connection with any bankruptcy or similar proceedings).

### III.D.6. Processing of Transactions

When you make a purchase or donation through the Site, we may collect your credit card number or other payment account number (for example, your wireless account number), billing address and other information related to such purchase (collectively, "Payment Information") from you, and may use Payment Information in order to fulfill your purchase. We may also provide Payment Information, or other personal information provided by you, to third parties as necessary to complete your transaction (for example, to process your credit card or payment account number). To the extent that Payment Information includes non-personal information, use of non-personal information is governed by the section on non-personal information above.

We also may use third-party payment services (each, a "Payment Service") to collect payments made through the Site. If you wish to make a payment through the Site using third-party payment services, you will be directed to a webpage that is hosted by the Payment Service (or the Payment Service's service providers) and not by Einstein (such page, the "Payment Service Page"). Any personal information that you provide through the Payment Service Page will be collected by Payment Service and not by Einstein, and will be subject to Payment Service's privacy policy, rather than this Policy. Einstein has no control over, and shall not be responsible for, Payment Service's use of information collected through the Payment Service Page.

### III.E. Choices

You may have the right to make choices ("opt in" and "opt out") of certain of our uses of your personal information. For example, at the time you are requested to provide personal information on this Site, you may have the opportunity to elect whether to receive certain types of correspondence from us, or to whether your information will be shared with third parties for marketing purposes. You may also make request regarding how your information is used by sending an e-mail to [opt-out@einsteinmed.org](mailto:opt-out@einsteinmed.org) or by clicking on an opt-out link within an e-mail you receive. Clearly indicate what choices you are making (electing not to receive promotional communications message from Einstein or requesting that we not share information with third parties for the third parties' marketing purposes). Please understand that if you opt out of receiving promotional correspondence from us, we may still contact you in connection with your relationship, activities, donations and communications with us.

Please note that if you opt-out as described above, we will not be able to remove personal information about you from the databases of third parties with which we have already shared personal information as of the date on which we implement the opt-out request. If you wish to cease receiving marketing-related e-mails from third parties, please contact the third parties directly or use any opt-out mechanisms set forth in their respective privacy policies or marketing-related e-mails.

### III.F. Wireless Addresses

If the e-mail address you provide to us is a wireless e-mail address, you agree to receive messages at such address from Einstein (unless and until you have elected not to receive such messages by following the instructions in the Choices section above). You understand that your wireless carrier's standard rates apply to these messages, and that you may change your mind at any time by following the instructions in

the Choices section above. You represent that you are the owner or authorized user of the wireless device on which messages will be received, and that you are authorized to approve the applicable charges.

### III.G. Access and Correction

If you would like to access the personal information we have collected about you through the Website or if you would like to update, correct or limit the use of any personal information you have provided to us via the Website, please email us at [webrunners@einsteinmed.org](mailto:webrunners@einsteinmed.org).

For your protection, we will only implement such requests with respect to the personal information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request and consistent with applicable law. You must clearly indicate the personal information that you wish to have changed, clearly indicate that you wish to have your personal information or clearly indicate the limitations you wish to put on our use of your personal information. We will endeavor to comply with your request as soon as reasonably practicable.

We may need to retain certain information for record-keeping purposes, and there may also be residual information that will remain within our databases and other records, which will not be removed.

### III.H. Security

While Einstein will use reasonable organizational, technical, and administrative measures to protect the security and integrity of sensitive personal information provided to this Site, due to the inherent nature of the Internet as an open global communications vehicle, we cannot guarantee that information, during transmission through the Internet or while stored on our system or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers. Please do not send us sensitive information through email.

You may be able to create an account on our Site with a username and password. You are responsible for maintaining the strict confidentiality of your account password, and you shall be responsible for any access to or use of the Site by you or any person or entity using your password, whether or not such access or use has been authorized by or on behalf of you, and whether or not such person or entity is your employee or agent. You agree to (a) immediately notify Einstein by contacting us in accordance with the "Contacting Us" section below of any unauthorized use of your password or account or any other breach of security, and (b) ensure that you exit from your account at the end of each session. We will not be responsible or liable for any loss or damage arising from your failure to comply with this provision.

In the unlikely event that we believe that the security of your personal information in our possession or control may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we would endeavor to do so as promptly as possible under the circumstances, and, to the extent we have your e-mail address, we may notify you by e-mail. You consent to our use of e-mail as a means of such notification. If you prefer for us to use another method to notify you in this situation, please e-mail us at [webrunners@einsteinmed.org](mailto:webrunners@einsteinmed.org) with the alternative contact information you wish to be used.

### III.I. Consent to Processing

By providing personal information to this Site, you understand and consent to the collection, maintenance, processing, and transfer of such information in and to the United States and other countries and territories.

### III.J. Third-Party “Linked-To” Sites

When you are on our Site you may have the opportunity to visit, or link to, other sites not operated by Einstein. (As an example, when you want to make a purchase from our online store, you link to a third-party Web site to place your order.) These sites may collect personal information about you. Einstein does not control sites that are operated by these entities and is not responsible for the information practices of these sites. This Privacy Policy does not address the information practices of those other Web sites. If you provide any personal information through any such third-party web site, your transaction will occur on such third party’s web site, and the personal information you provide will be collected by and controlled by the privacy policy of that third party.

### III.K. Changes to this Privacy Policy

Einstein reserves the right to change or update this Privacy Policy, or any other of our policies or practices, at any time, and will notify users of this Site by posting such changed or updated Privacy Policy on this page. Any changes or updates will be effective immediately upon posting to this Site. Under certain circumstances, we may also elect to notify you of changes or updates to our Privacy Policy by additional means, such as posting a notice on the front page of our Site to sending you an e-mail. You can determine when this Privacy Policy was last updated by referring to the “LAST UPDATED” date above.

### III.L. Note Regarding the Use of the Site by Children

The Site is not directed to individuals under the age of thirteen (13), and we request that such individuals do not provide personal information through the Site.

### III.M. Contact Us

If you have any questions or comments regarding our privacy practices, you may contact us by e-mail at [webrunners@einsteinmed.org](mailto:webrunners@einsteinmed.org).

### III.N. References

Adherence to the Einstein Acceptable Use of Information Resources Policy, IT-POL-2018-002.

## IV. Definitions

None.

## V. Effective Date


Effective as of: 7 January 2019



**VI. Policy Management and Responsibilities**

Einstein's Information Technology department is the Responsible Office under this Policy. Einstein's Associate Dean for Finance and Administration is the Responsible Executive. Einstein's Assistant Dean for Information Technology is the Responsible Officer for the management of this Policy.

**VII. Approved (or Revised)**

  
Responsible Executive DL Date 1-8-19