**Privacy Policy**

**This Privacy Policy sets out how we, The American Institute of Health Care Professionals, Inc., collect, store and use information about you when you use or interact with our websites, (**[**www.aihcp.org**](http://www.aihcp.org)**, and** [**www.aihcp.net**](http://www.aihcp.net) **) and where we otherwise obtain or collect information about you. This Privacy Policy is effective May 25th, 2018.**

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**Summary**

This section summarises how we obtain, store and use information about you. It is intended to provide a very general overview only. **It is not complete in and of itself and it must be read in conjunction with the corresponding full sections of this Privacy Policy.**

* **Data controller**: **Dominick L. Flarey, Ph.D., MBA, RN-BC**
* **How we collect or obtain information about you**:
	+ when you provide it to us by contacting us, registering for courses or making applications for certifications, requesting information for our programs and courses and certifications or/and making payments on-line and/or by check or money order, and by completing any of our online forms.
	+ from your use of our website, using cookies and similar technologies.
* **Information we collect**: name. address, email, date of contact with us, email address, phone numbers, any payment information that you provide to us including credit card payment information or/and payment information by checks or money orders. Information about how you use our website related to our online examination program including scoring of examinations and grades and any information on website use as provided by outside consulting services for analytic purposes.
* **How we use your information**: for administrative and business purposes particularly to contact you, to provide you with requested information regarding our services, products, to fulfil our contractractual obligations to you, to advertise our services and products, to provide you advisement and mentoring and consultation as needed by you, to respond to your questions, and in connection with our legal rights and obligations to fully execute our mission and objectives and to fully serve our clients and those inquiring about our programs, products and services. Also, for our own internal audits, analytics and quality assurance and compliance programs.
* **Disclosure of your information to third parties?:** only to the extent necessary to comply with any applicable laws or to fulfil any contracts entered into with you, or in circumstances in which you disclose personal information to third parties.
* **Do we sell your information to third parties (other than in the course of a business sale or purchase or similar even)?**: **NO**
* **How long we retain your information**: for no longer than necessary, taking into account any legal obligations we have (e.g. to maintain records for tax purposes), any other legal basis we have for using your information (e.g. your consent, performance of a contract with you or our legitimate interests as a business) and to maintain all mandated compliances for our CE courses approvals by various Organizational and State Board Approvers of Continuing Education.
* **How we secure your information**: using appropriate technical and organisational measures such as storing your information on secure servers, encrypting transfers of date to or from our servers using Secure Sockets Layer (SSL) technology, encrypting payments you make on or via our website using Secure Sockets Lay (SSL) technology, only granting access to your information where necessary, and spoliation of all credit card numbers provided once the payments have been processed.
* **Use of cookies and similar technologies:** we use cookies and similar technologies only for analytic purposes through third party companies such as Google Adwords to monitor marketing campaign effectiveness and outcomes.
* **Transfers of your information outside the European Economic Area**: we will only transfer your information outside the European Economic Area if we are required to do so by law or if you specifically request us to do so in writing with a written request made to our Data Control Officer. Where we do so, we will ensure appropriate safeguards are in place
* **Use of automated decision making and profiling**: we only use automated decision making and profiling as provided to us by third parties related to reports of marketing advertisement campaigns, such as Google AdWords.
* **Your rights in relation to your information**
	+ to access your information and to receive information about its use
	+ to have your information corrected and/or completed
	+ to have your information deleted
	+ to restrict the use of your information
	+ to receive your information in a portable format
	+ to object to the use of your information
	+ to withdraw your consent to the use of your information
	+ to complain to a supervisory authority
* **Sensitive personal information**: we do not knowingly or intentionally collect what is commonly referred to as ‘sensitive personal information’. Please do not submit sensitive personal information about you to us. For more information, please see the main section below entitled Sensitive Personal Information.

**Our details**

The data controller in respect of our website is Dominick L. Flarey, Ph.D., RN, who is also the Executive Director of the American Institute of Health Care Professionals, Inc. located at 2400 Niles-Cortland Rd. S.E., Warren Ohio 44484. You can contact the Data Control Officer at this address and also by phone at 330-652-7776 and by e-mail at: info@aihcp.org.

**If you have any questions about this Privacy Policy, please contact the data controller.**

**Information we collect when you visit our website**

We collect and use information from website visitors in accordance with this section and the section entitled Disclosure and additional uses of your information.

**Web server log information**

We use a third-party server to host our website called InMotion Hosting, the privacy policy which is available here: click here.

[third party][[1]](#footnote-1) server to host our website [called [*insert name of server provider*], the privacy policy of which is available here: [*insert link to privacy policy*]].[[2]](#footnote-2) [Our website server automatically logs the IP address you use to access our website as well as other information about your visit such as [the pages accessed,] [information requested,] [the date and time of the request,] [the source of your access to our website (e.g. the website or URL (link) which referred you to our website),] [and] [your browser version and operating system] [and] [*insert any additional information your website’s server about an individual’s visit to your website*.][[3]](#footnote-3)

Our server is located in the United States of America, and accordingly, your information is transferred outside the European Economic Area (EEA). For further information and information on the safeguards used, please see the section of this privacy policy titled: Transfers of your information outside the European Economic Area.

Use of website server log information for IT security purposes

We do not access log data from our website server and /or third-party hosting providers, unless we are investigating suspicious or potential criminal activity, and we do not make, nor do we allow our hosting provider to make any attempts to identify you from the information collected via server logs.

**Legal basis for processing**:compliance with a legal obligation to which we are subject (Article 6(1)(c) of the General Data Protection Regulation).

**Legal obligation**: we have a legal obligation to implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk of our processing of information about individuals. Recording access to our website using server log files is such a measure.

**Legal basis for processing**:our and our Host Server’s legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interests**: we and our Host Server have a legitimate interest in using your information for the purposes of ensuring network and information security.

Use of website server log information to analyse website use and improve our website

We use the information gathered from the analysis of this information to improve our website. For example, we use the information gathered to change the information, content and structure of our website and individual pages based according to what users are engaging most with and the duration of time spent on particular pages on our website.

**Information we collect when you contact us**

We collect and use information from individuals who contact us in accordance with this section and the section entitled Disclosure and additional uses of your information.

**Email**

When you send an email to the email address displayed on our website we collect your email address and any other information you provide in that email (such as your name, telephone number and the information contained in any signature block in your email).

**Legal basis for processing**:ourlegitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest(s)**: responding to enquiries and messages we receive and keeping records of correspondence.

**Legal basis for processing**: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary to perform a contract**: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

We use a third-party email provider to store emails you send us. Our third-party email provider is InMotion Hosting located in the United States of America. Their privacy policy is available here:

Emails you send us will be stored outside the European Economic Area on our third-party email servers in the United States of America *its servers are located*)][[4]](#footnote-4).For further information please see the section of this privacy policy entitled Transfers of your information outside the European Economic Area.][[5]](#footnote-5)

**Contact form**

When you contact us using our contact form, we collect all information that you willingly provide to us which typically includes, name, email address, date, time of inquiry, address, phone numbers, the type of information you are requesting of us and professional background information you include about yourself and any other information or questions that you include on our contact forms.

If you do not provide the mandatory information required by our contact form, you will not be able to submit the contact form and we will not receive your enquiry.

If you do not supply the optional information required by our contact form, [*insert consequences of an individual not providing the optional information requested by your contact form (such as phone number) e.g. we will not be able to respond to your enquiry by phone*.

**Legal basis for processing**:ourlegitimate interests (Article 6(1)(f) of the General Data Protection Regulation

**Legitimate interest(s)**: responding to enquiries and messages we receive and keeping records of correspondence.

**Legal basis for processing**: necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary to perform a contract**: where your message relates to us providing you with goods or services or taking steps at your request prior to providing you with our goods and services (for example, providing you with information about such goods and services), we will process your information in order to do so).

Transfer and storage of your information

Messages you send us via our contact form will be stored outside the European Economic Area on our [third party hosting or email provider’s servers in the United States of America.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.]

**Phone**

When you contact us by phone, we collect your phone number and any information provide to us during your conversation with us.

**We do not record phone calls.**

**Post**

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

**Information we collect when you interact with our website**

We collect and use information from individuals who interact with particular features of our website in accordance with this section and the section entitled Disclosure and additional uses of your information.

**Transfer and storage of your information**

[We use a third-party service to send out our e-newsletter and administer our mailing list, Constant Contact.com *of third party provider* Their privacy policy is available here: [*insert link to third party’s privacy polic*

Information you submit to subscribe for our e-newsletter will be stored outside the European Economic Area on our third-party mailing list provider’s servers in the United States of America. For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

Use of web beacons and similar technologies in emails

We use technologies such as web beacons (small graphic files)] and *other technologies used by our third-party mailing list provider* in the emails we send to allow us to assess the level of engagement our emails receive by measuring information such as the delivery rates, open rates and click through rates.

For more information on how we use web beacons in our e-newsletter emails, see our cookies policy which is available here: [*insert link to cookies policy*

[For more information about our third-party mailing list provider and they use web beacons, please see their privacy policy which is available here: [*insert link to privacy policy*].][[6]](#footnote-6)

Transfer and storage of your information

[Information you submit to us via the registration form on our website will be stored outside the European Economic Area on our InMotion servers in the United States of America. Our third-party hosting provider is InMotion Hosting located in the United States of America. Their privacy policy is available here: [*insert link to your third-party email provider’s privacy policy*].][[7]](#footnote-7)

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

**Information we collect when you place an order on our website**

We collect and use information from individuals who place an order on our website in accordance with this section and the section entitled Disclosure and additional uses of your information.

**Information collected when you place an order**

Mandatory information

When you place an order for goods or services on our website, we collect your name, email address, billing address, shipping address, company name (if applicable), VAT number (if applicable), and phone number, full payment information, employers name and payment information if they are funding your courses or certifications and have authorized you to provide their information, and your information on which products you are registering for.

If you do not provide this information, you will not be able to purchase goods or services from us on our website or enter into a contract with us.

**Legal basis for processing**:necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary to perform a contract**: we need the mandatory information collected by our checkout form to establish who the contract is with and to contact you to fulfil our obligations under the contract, including sending you receipts and order confirmations.[[8]](#footnote-8)

[**Legal basis for processing**: compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

**Legal obligation**: we have a legal obligation to issue you with an invoice for the goods and services you purchase from us where you are VAT registered and we require the mandatory information collected by our checkout form for this purpose. We also have a legal obligation to keep accounting records, including records of transactions][[9]](#footnote-9)

**Processing your payment**

After you place an order on our website you will need to make payment for the goods or services you have ordered. In order to process your payment, we use a third-party payment processor; Authorize Net, and Finet. Their privacy policies:

Authorize Net: click here

Finet: click here

Transfer and storage of your information

Authorize.Net is located in the United States of America]. Information relating to the processing of your payment is stored outside of the European Economic Area on our third-party payment processor’s servers in the United States of America.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.

**Legal basis for processing**:necessary to perform a contract (Article 6(1)(b) of the General Data Protection Regulation).

**Reason why necessary to perform a contract**: to fulfil your contractual obligation to pay for the goods or services you have ordered from us.

**Information collected or obtained from third parties**

This section sets out how we obtain or collect information about you from third parties.

**Information received from third parties**

Generally, we do receive information about you from third parties. The third parties from which we receive information about you will generally include very limited data from Google AdWords and Constant Contact.com.

Information we obtain from third parties will NOT be your name and contact details, other than e-mail.

**Legal basis for processing**:necessary to perform a contract or to take steps at your request to enter into a contract (Article 6(1)(b) of the General Data Protection Regulation).
**Reason why necessary to perform a contract**: where a third party has passed on information about you to us (such as your name and email address) in order for us to provide services to you, we will process your information in order to take steps at your request to enter into a contract with you and perform a contract with you (as the case may be).

**Legal basis for processing**:consent (Article 6(1)(a) of the General Data Protection Regulation).
**Consent**: where you have asked that a third party to share information about you with us and the purpose of sharing that information is not related to the performance of a contract or services by us to you, we will process your information on the basis of your consent, which you give by asking the third party in question to pass on your information to us.

**Legal basis for processing**:our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interests**: where a third party has shared information about you with us and you have not consented to the sharing of that information, we will have a legitimate interest in processing that information in certain circumstances.

For example, we would have a legitimate interest in processing your information to perform our obligations under a sub-contract with the third party, where the third party has the main contract with you. Our legitimate interest is the performance of our obligations under our sub-contract.

Similarly, third parties may pass on information about you to us if you have infringed or potentially infringed any of our legal rights. In this case, we will have a legitimate interest in processing that information to investigate and pursue any such potential infringement.

**Where we receive information about you in error**

If we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete your information.

Use of profiling in marketing emails

We use [web beacon] **AND/OR** *other technologies* in our marketing emails to analyse who opens our emails and what actions they take (for example, what they click on). We will only process information from web beacons] **AND/OR** *insert other technologies you use* if you have consented to their use in accordance with our cookies policy [*insert link to cookies policy*).

**Logic involved**: by analysing how our email recipients respond to our emails, we are able to improve the content and effectiveness of our emails and gauge who is most interested.

**Significance and envisaged consequences**: your behaviour when you open our emails will be tracked using small gif files (web beacons) and open rates, click through rates.

**How to object**: **contact us at: The American Institute of Health Care Professionals, Inc. 2400 Niles-Cortland Rd. S.E. Suite # 4, Warren, Ohio 44484. Phone: 330-652-7776. E-mail:** **info@aihcp.org**

**Legal basis for processing**:legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest**: analysing the level of engagement and effectiveness of our marketing emails and content

**Disclosure and additional uses of your information**

This section sets out the circumstances in which will disclose information about you to third parties and any additional purposes for which we use your information.

**Disclosure of your information to service providers**

We use a number of third parties to provide us with services which are necessary to run our business or to assist us with running our business [and who process your information for us on our behalf].[[10]](#footnote-10) These include the following:[[11]](#footnote-11)

* Telephone provider(s), including Spectrum: Their privacy policy is available here: [*insert link to privacy policy*]
* Email provider(s), InMotion Hosting: Their privacy policy is available here: [*insert link to privacy policy*]
* IT service provider(s): InMotion Hosting. Their privacy policy is available here: [*insert link to privacy policy*]
* Web developer(s): In house . Their privacy policy is available here: [*insert link to privacy policy*]
* Hosting provider(s): InMotion Hosting. Their privacy policy is available here: [*insert link to privacy policy*]

**Our third-party service providers are located in the United States** **of America**

Your information will be shared with these service providers where necessary to provide you with the service you have requested, whether that is accessing our website or ordering goods and services from us.

**Disclosure of your information to other third parties**

We disclose your information to other third parties in specific circumstances, as set out below.

Providing information to third parties such as *Google Inc.*, *and* Constant Contact, and Authorize.Net and Finet. Google collects information through our use of Google Analytics on our website. Google uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Google Analytics service. Information is shared with Google on an aggregated and anonymised basis. To find out more about what information Google collects, how it uses this information and how to control the information sent to Google, please see the following page: <https://www.google.com/policies/privacy/partners/>][[12]](#footnote-12)

**Legal basis for processing**:ourlegitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest(s)**: meeting our contractual obligations to Google under our Google Analytics Terms of Service (<https://www.google.com/analytics/terms/us.html>)

You can opt out of Google Analytics by installing the browser plugin here: <https://tools.google.com/dlpage/gaoptout>

Transfer and storage of your information

Information collected by Google Analytics is stored outside the European Economic Area on Google’s servers in the United States of America.

For further information about the safeguards used when your information is transferred outside the European Economic Area, see the section of this privacy policy below entitled Transfers of your information outside the European Economic Area.]

Sharing your information with third parties, which are either related to or associated with the running of our business, where it is necessary for us to do so. These third parties might include our accountants, advisors, business partners, independent contractors, an] insurers. [

**Legal basis for processing**:ourlegitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest**: running and managing our business efficiently.

Sharing your information with a prospective or actual purchaser or seller in the context of a business or asset sale or acquisition by us, a merger or similar business combination event, whether actual or potential.

**Legal basis for processing**:legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

 **Legitimate interest(s)**:sharing your information with a prospective purchaser, seller or similar person in order to allow such a transaction to take place.

**Disclosure and use of your information for legal reasons**

Indicating possible criminal acts or threats to public security to a competent authority

If we suspect that criminal or potential criminal conduct has been occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that we fraud or a cyber- crime has been committed or if we receive threats or malicious communications towards us or third parties.

We will generally only need to process your information for this purpose if you were involved or affected by such an incident in some way.

**Legal basis for processing**:ourlegitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interests**: preventing crime or suspected criminal activity (such as fraud).

In connection with the enforcement or potential enforcement our legal rights

We will use your information in connection with the enforcement or potential enforcement of our legal rights, including, for example, sharing information with debt collection agencies if you do not pay amounts owed to us when you are contractually obliged to do so. Our legal rights may be contractual (where we have entered into a contract with you) or non-contractual (such as legal rights that we have under copyright law or tort law).

**Legal basis for processing**: our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest:** enforcing our legal rights and taking steps to enforce our legal rights.

In connection with a legal or potential legal dispute or proceedings

We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

**Legal basis for processing:** our legitimate interests (Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest(s):** resolving disputes and potential disputes.

For ongoing compliance with laws, regulations and other legal requirements

We will use and process your information in order to comply with legal obligations to which we are subject. For example, we may need to disclose your information pursuant to a court order or subpoena if we receive one

or to the National Crime Agency in connection with suspected or potential money laundering matters.

**Legal basis for processing**:compliance with a legal obligation (Article 6(1)(c) of the General Data Protection Regulation).

 **Legal obligation(s)**:legal obligations to disclose information which are part of the laws of England and Wales or if they have been integrated into the United Kingdom’s legal framework (for example in the form of an international agreement which the United Kingdom has signed).

**Legal basis for processing**:our legitimate interests(Article 6(1)(f) of the General Data Protection Regulation).

**Legitimate interest**: where the legal obligations are part of the laws of another country and have not been integrated into the United Kingdom’s legal framework, we have a legitimate interest in complying with these obligations.

**How long we retain your information**

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

**Retention periods**[[13]](#footnote-13)

Server log information: we retain information on our server logs for: no more than 18 months.

Order information: when you place an order for goods and services, we retain that information for six years following the end of the financial year in which you placed your order, in accordance with our legal obligation to keep records for tax purposes.

Correspondence and enquiries: when you make an enquiry or correspond with us for any reason, whether by email or via our contact form or by phone, we will retain your information for as long as it takes to respond to and resolve your enquiry, and for no more than 18month(s)[[14]](#footnote-14)after which point we will delete your information.

**[**E-Newsletter: we retain the information you used to sign up for our e-newsletter for as long as you remain subscribed (i.e. you do not unsubscribe) or if we decide to cancel our e-newsletter service, whichever comes earlier, but for no longer than 18 months.

**Criteria for determining retention periods**

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

* [the purpose(s) and use of your information both now and in the future (such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future);
* whether we have any legal obligation to continue to process your information (such as any record-keeping obligations imposed by relevant law or regulation);
* whether we have any legal basis to continue to process your information (such as your consent);
* how valuable your information is (both now and in the future);
* any relevant agreed industry practices on how long information should be retained;
* the levels of risk, cost and liability involved with us continuing to hold the information;
* how hard it is to ensure that the information can be kept up to date and accurate; and
* any relevant surrounding circumstances (such as the nature and status of our relationship with you).][[15]](#footnote-15)

**How we secure your information**[[16]](#footnote-16)

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

* only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
* using secure servers to store your information
* verifying the identity of any individual who requests access to information prior to granting them access to information;
* using Secure Sockets Layer (SSL) software to encrypt any information you submit to us via any forms on our website and any payment transactions you make on or via our website
* only transferring your information via closed system or encrypted data transfer and

**Transmission of information to us by email**

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet (whether by email, via our website or any other means), you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.[[17]](#footnote-17)

**Transfers of your information outside the European Economic Area**

In circumstances set out below, we will also transfer your information outside the EEA or to an international organisation in order to comply with legal obligations to which we are subject (compliance with a court order, for example). Where we are required to do so, we will ensure appropriate safeguards and protections are in place.

**Server log information**

[Information collected when you visit our website is transferred outside of the EEA and stored on the servers of our host, InMotion Hosting, located in the United States of America. You can access their privacy policy here: [*insert link to privacy policy*].]

Country of storage: The United States of America. This country IS NOT subject to an adequacy decision by the European Commission.][[18]](#footnote-18)

Safeguard(s) used: it is unknown at this time if our third-party hosting provider has self-certified its compliance with the EU-U.S. Privacy Shield.

 **Email**

Information you submit to us by email is transferred outside the EEA and stored on our third-party email provider’s servers. Our third-party email provider is: InMotion Hosting. You can access their privacy policy here: [*insert link to privacy policy*].]

Country of storage: The United States of America. This country IS NOT subject to an adequacy decision by the European Commission.

Safeguard(s) used: it is not known at this time if InMotion Hosting has self-certified its compliance with the EU-US Privacy Shield

**E-Newsletter**

[Information you submit to us when you sign up for our e-newsletter is transferred outside the EEA and stored on our third-party mailing list provider’s servers. Our third-party mailing list provider is: InMotion Hosting. You can access their privacy policy here: [*insert link to privacy policy*].]

Country of storage: The United States of American. This country IS NOT subject to an adequacy decision by the European Commission.

Safeguard(s) used: our third-party mailing list provider: Constant Contact.com: it is not known at this time if they have self-certified its compliance with the EU-U.S. Privacy Shield.

**Google Analytics**

Information collected by Google Analytics, our IP address and actions we take in relation to our website, is transferred outside the EEA and stored on Google’s servers. You can access Google’s privacy policy here: <https://www.google.com/policies/privacy/>

Country of storage: United States of America. This country is not subject to an adequacy decision by the European Commission.

Safeguard(s) used: Google has self-certified its compliance with the EU-U.S. Privacy Shield which is available here: <https://www.privacyshield.gov/welcome>. The EU-U.S. Privacy Shield is an approved certification mechanism under Article 42 of the General Data Protection Regulation, which is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here: <http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm>

**Your rights in relation to your information**

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by writing to:

**The American Institute of Health Care Professionals, Inc.**

**2400 Niles-Cortland Rd. S.E., Suite # 4**

**Warren, Ohio 44484**

**E-mail: info@aihcp.org**

* **to request access to your information** and information related to our use and processing of your information;
* **to request the correction or deletion** of your information;
* **to request that we restrict our use** of your information;
* **to receive information which you have provided to us in a structured, commonly used and machine-readable format** (e.g. a CSV file) and the right to have that information transferred to another data controller (including a third-party data controller);
* **to object to the processing of your information for certain purposes** (for further information, see the section below entitled Your right to object to the processing of your information for certain purposes); and
* **to withdraw your consent to our use of your information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.
* **the right not to be subject to a decision based solely on automated processing, including profiling which produces legal affects concerning you or similarly significantly affects you**

In accordance with Article 77 of the General Data Protection Regulation, you also have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or of an alleged infringement of the General Data Protection Regulation.

For the purposes of the UK, the supervisory authority is the Information Commissioner’s Office (ICO), the contact details of which are available here: <https://ico.org.uk/global/contact-us/>

Further information on your rights in relation to your personal data as an individual

The above rights are provided in summary form only and certain limitations apply to many of these rights. For further information about your rights in relation to your information, including any limitations which apply, please visit the following pages on the ICO’s website:

* <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>; and
* <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>

You can also find out further information about your rights, as well as information on any limitations which apply to those rights, by reading the underlying legislation contained in Articles 12 to 22 and 34 of the General Data Protection Regulation, which is available here: <http://ec.europa.eu/justice/data-protection/reform/files/regulation_oj_en.pdf>

Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

***How we verify your identity***

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identity you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

**Your right to object to the processing of your information for certain purposes**

You have the following rights in relation to your information, which you may exercise in the same way as you may exercise by writing to

**The American Institute of Health Care Professionals, Inc.**

**2400 Niles-Cortland Rd. S.E., Suite # 4**

**Warren, Ohio 44484**

**E-mail: info@aihcp.org**

* to object to us using or processing your information where we use or process it in order to **carry out a task in the public interest** **or for our legitimate interests**, including ‘profiling’ (i.e. analysing or predicting your behaviour based on your information) based on any of these purposes; and
* to object to us using or processing your information for **direct marketing purposes** (including any profiling we engage in that is related to such direct marketing).

You may also exercise your right to object to us using or processing your information for direct marketing purposes by:

* **clicking the unsubscribe link** contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link;
* **sending an SMS message** containing only the words “OPT OUT” in reply to any marketing communication we send by text message; or
* **sending an email** to info@aihcp.org asking that we stop sending you marketing communications or by including the words “OPT OUT”.

For more information on how to object to our use of information collected from cookies and similar technologies, please see the section entitled How to accept or reject cookies in our cookies policy, which is available here: [*insert link to your cookies policy*]

**Sensitive Personal Information**

‘Sensitive personal information’ is information about an individual that reveals their racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic information, biometric information for the purpose of uniquely identifying an individual, information concerning health or information concerning a natural person’s sex life or sexual orientation.

[We do not knowingly or intentionally collect sensitive personal information from individuals, and you must not submit sensitive personal information to us.

If, however, you inadvertently or intentionally transmit sensitive personal information to us, you will be considered to have explicitly consented to us processing that sensitive personal information under Article 9(2)(a) of the General Data Protection Regulation. We will use and process your sensitive personal information for the purposes of deleting it.

**Changes to our Privacy Policy**

We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website.

We will provide you with the information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.

**Children’s Privacy**

Because we care about the safety and privacy of children online, we comply with the Children’s Online Privacy Protection Act of 1998 (COPPA). COPPA and its accompanying regulations protect the privacy of children using the internet. We do not knowingly contact or collect information from persons under the age of 18. The website is not intended to solicit information of any kind from persons under the age of 18.

It is possible that we could receive information pertaining to persons under the age of 18 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will, where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 18, please do so by sending an email to: info@aihcp.org

**California Do Not Track Disclosures**

“Do Not Track” is a privacy preference that users can set in their web browsers. When a user turns on a Do Not Track signal in their browser, the browser sends a message to websites requesting that they do not track the user. For information about Do Not Track, please visit [www.allaboutdnt.org](http://www.allaboutdnt.org)

At this time, we do not respond to Do Not Track browser settings or signals. [In addition, we use other technology that is standard to the internet, such as pixel tags, web beacons, and other similar technologies, to track visitors to the website. Those tools may be used by us and by third parties to collect information about you and your internet activity, even if you have turned on the Do Not Track signal.] For information on how to opt out from tracking technologies used on our website, see our cookies policy which is available here: [*insert link to cookies policy*

**Copyright, credit and logo**

This Privacy Policy is based on a General Data Protection Regulation (Regulation (EU) 2016/769) (GDPR) compliant template provided by GDPR Privacy Policy. For further information, please visit <https://gdprprivacypolicy.org>

The copyright in this Privacy Policy is either owned by, or licensed to, us and is protected by copyright laws around the world and copyright protection software. All intellectual property rights in this document are reserved.

Where we display the GDPR Privacy Policy logo on our website, this is used to indicate that we have adopted a privacy policy template provided by GDPR Privacy Policy as the basis for this Privacy Policy.

**Approved: May 25, 2018**

**Dominick L. Flarey, Ph.D., MBA, RN-BC**

**President & Executive Director**

**The American Institute of Health Care Professionals, Inc.**

**Appendix 1**

**Safeguards for overseas transfers**

***NOTE TO USER: THIS APPENDIX IS FOR REFERENCE AND ASSISTANCE WITH COMPLETING YOUR PRIVACY POLICY AND SHOULD BE DELETED PRIOR TO YOU UPLOADING YOUR PRIVACY POLICY TO YOUR WEBSITE***

* [an adequacy decision by the European Commission. This is permitted under Article 45(1) of the General Data Protection Regulation. The adequacy decision relied on by us is [*insert reference to adequacy decision e.g. Commission Decision 2004/411/EC in respect of the Isle of Man*] and is available here: <http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm>]
* [data protection policies adhered to by the data controller and other companies and entities within our corporate group from time to time, which comply with applicable laws, known as “binding corporate rules” or “BCRs” under Article 47 of the General Data Protection Regulation. This is permitted under Article 46(2)(b) of the General Data Protection Regulation. [These policies are available here [*insert link to binding corporate rules if you have made them available*].]
* standard data protection clauses adopted by the European Commission in accordance with its committee examination procedure under Article 93(2) of the General Data Protection Regulation. This is permitted under Article 46(2)(c) of the General Data Protection Regulation. [These clauses are available here [*insert link to your standard data protection clauses if you have made them available*].]
* standard data protection clauses adopted by the Information Commissioner’s Office and approved by the European Commission pursuant to the committee examination procedure under Article 93(2) of the General Data Protection Regulation. This is permitted under Article 46(2)(d) of the General Data Protection Regulation. [These clauses are available here [*insert link to your standard data protection clauses if you have made them available*].]
* an approved code of conduct under Article 42 of the General Data Protection Regulation. This is permitted under Article 46(2)(f) of the General Data Protection Regulation. [This code of conduct is available here [*insert link to your standard data protection clauses if you have made them available*].]
* [*insert name of certification mechanism e.g. EU-U.S. Privacy Shield*], an approved certification mechanism under Article 42 of the General Data Protection Regulation. This is permitted under Article 46(2)(f) of the General Data Protection Regulation. You can access [*insert name of mechanism*] here: [*insert link to mechanism e.g. for the EU-U.S. Privacy Shield:* [*https://www.privacyshield.gov/welcome*](https://www.privacyshield.gov/welcome)] [and the European Commission decision on the adequacy of the EU-U.S. Privacy Shield here: <http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm>][[19]](#footnote-19).
1. [↑](#footnote-ref-1)
2. [↑](#footnote-ref-2)
3. [↑](#footnote-ref-3)
4. [↑](#footnote-ref-4)
5. [↑](#footnote-ref-5)
6. . [↑](#footnote-ref-6)
7. [↑](#footnote-ref-7)
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15. [↑](#footnote-ref-15)
16. [↑](#footnote-ref-16)
17. . [↑](#footnote-ref-17)
18. [↑](#footnote-ref-18)
19. Insert this final section in square brackets if the mechanism used is the EU-U.S. Privacy Shield. [↑](#footnote-ref-19)