

## **WEB PRIVACY POLICY**

### **DATA REGISTRY SERVICES, LLC**

DATA REGISTRY SERVICES, LLC (“DRS”, “WE”, “US” OR “OUR”) VALUES THE PROTECTION OF INDIVIDUAL PRIVACY AND IS COMMITTED TO THE PRIVACY OF THOSE WHO VISIT AND USE OUR WEBSITE (“SITE”). THIS DOCUMENT SETS FORTH THE PRIVACY POLICY (“PRIVACY POLICY”) FOR THE DRS WEBSITE. THIS PRIVACY POLICY GOVERNS THE MANNER IN WHICH WE COLLECT, USE, MAINTAIN, DISCLOSE AND SECURE INFORMATION COLLECTED FROM USERS OF THE SITE. BY USING THE SITE IN ANY WAY, YOU AGREE TO BE BOUND BY THIS PRIVACY POLICY. YOU SHOULD READ THIS PRIVACY POLICY, AND IF YOU DO NOT AGREE TO IT, DO NOT USE THE SITE. EXCEPT FOR THE LIMITED SITUATIONS MENTIONED BELOW, DRS DOES NOT SHARE OR SELL YOUR INFORMATION COLLECTED ONLINE.

#### **GENERAL**

- We do not collect personally identifiable information (“PII”) about you unless you choose to provide that information to us.
- Any personal information you chose to provide on or through the Site is protected by our security practices.
- PII [related to your visit to our Site](#) may be automatically collected and temporarily stored.
- We do not disclose, give, sell, or transfer any PII about our visitors unless required for law enforcement purposes or by as otherwise required by Federal law.

#### **PERSONALLY IDENTIFIABLE INFORMATION VOLUNTARILY SUBMITTED TO DRS**

Each time you visit the Site, we collect information about you. Some of the information collected is personally identifiable – meaning it can be used to identify who you are, and some of it is not. We collect PII about you in various ways when you visit the Site. During your interactions with the Site, such as when you complete a “Contact Us” form, leave a comment on the Site, send us an email, or complete a survey, we may collect the following types of information:

- Your name;
- Address;
- Telephone number;
- Email address;
- Your preferences for receiving additional information such as newsletters;
- Such other type of information that you volunteer.

If you choose to provide us with PII, we may use that information to respond to your message and/or help us get you the information you requested. Submitting PII is voluntary and is not required to access information on our Site. We retain such PII only for as long as is necessary depending on the reason for your submission (which could extend beyond the reason that caused you to visit the Site), and collect no

more personally identifiable information than is reasonably necessary to provide you with the information requested. We do not share this personally identifiable information with any third parties except in the very limited circumstances as noted below.

Information submitted electronically is retained indefinitely. It may be subject to disclosure in certain cases (for example, if required by a Freedom of Information Act request or pursuant to court order, or if authorized by a Privacy Act System of Records Notice). It is subject to the Privacy Act if maintained in a Privacy Act system.

#### **VISITING AN OFFICIAL DRS PAGE ON THIRD-PARTY WEBSITES**

We maintain accounts on third-party websites, such as social media sites, as tools to better interact with the public. The security and privacy policies of those third-party websites apply to your activity on those sites. You should understand that any information that you submit on any public forum through third-party websites is not and cannot be treated as confidential by us, and is not subject to this Privacy Policy. Users of third-party websites often share information with the general public, user community, and/or the third-party operating the website. You should review the privacy policies of all third-party websites before using them and ensure that you understand how your information may be used by them. You should also adjust privacy settings on your account on any third-party website to match your preferences.

#### **INFORMATION COLLECTED AND USED FROM THIRD-PARTY WEBSITES**

If you have an account with a third-party website, and choose to follow, like, friend, or comment on a third-party website managed by DRS, certain personal information associated with your account may be made available to us based on the privacy policies of the third-party website and your privacy settings within that website. **We do not share PII made available through these websites.**

Each use of a third-party website may have unique features or practices. We may sometimes collect and use the information made available through third-party websites.

#### **INFORMATION AUTOMATICALLY COLLECTED AND STORED**

When you browse through our Site, we may gather and temporarily store technical information about your visit. **This information does not identify who you are.** The information we collect includes:

- The name of the domain you use to access the Internet;
- your computer's Internet protocol (IP) address;
- The date and time of your visit;
- The pages you visited; and
- The address of the website you came from when you came to visit.

We use this information to improve our Site and provide a better user experience for our visitors. We use a tool, Google Analytics, to collect and summarize this information. This information is available only to web managers and other designated DRS staff who require this information to perform their duties. It is retained only for as long as needed for proper analysis.

## **COOKIES**

We use “cookies” to test and optimize our website design and content. A cookie is a small text file automatically placed on your computer. We use two types of cookies on our Site:

- We use **session cookies** to gather data for technical purposes, such as improving navigation through our Site and generating statistics about how the Site is used. Session cookies are temporary text files that expire when you leave our Site. When cookies expire, they are automatically deleted from your computer. **We do not use session cookies to collect PII, and we do not share data collected from session cookies.**
- We use **multi-session cookies**, or persistent cookies, to customize our Site for frequent visitors and to test variations of Site design and content. Multi-session cookies are cookies that are stored over more than a single session on your computer. **We do not use multi-session cookies to collect PII, and we do not share data collected from multi-session cookies.** DRS is unable to identify an individual by using such technologies.

You can choose to set your web browser to turn off cookies, but if you do, you may lose certain features when navigating on the Site.

## **SITE SECURITY**

DRS maintains reasonable physical, electronic and procedural safeguards to protect the confidentiality and security of any PII that you disclose to us. We limit access to your PII within DRS and DRS’s affiliates to those employees who need to know such information to provide information or services to you. However, due to the nature of the internet and computer systems, no transmission of data over the internet is guaranteed to be completely secure, regardless of our best intentions. As such, DRS cannot ensure or warrant the security of any PII you transmit to us.

## **DISCLOSURE OF INFORMATION**

DRS may need to share your information with third parties in limited circumstances. For instance, and from time to time, we may share the information you provide to us, including PII, with outside contractors, auditors, consultants, or others hired by us to assist in providing financial, operational or research activities on our behalf. We require these parties to use such PII only for the specifically intended and authorized purpose, on behalf of DRS, and consistent with this Privacy Policy.

You also understand that DRS is a data collection and storage company and in this capacity, we share certain information with other health care entities, such as pharmaceutical companies. We do not share any PII with these other parties, and our data information sharing practices are outlined in a separate company privacy policy.

## **BUSINESS TRANSITIONS**

In the event DRS goes through a business transition, such as a merger, being acquired by another company, bankruptcy, or selling a portion of our assets, Site users’ PII may be part of the assets transferred.

## **PRIVACY POLICY CHANGES**

Our Privacy Policy is intended to provide you with a safe and secure experience. We reserve the right to change, modify, add or remove portions of our Privacy Policy at any time without prior notice at our sole discretion. If we decide to change our Privacy Policy, we will post those changes on the Site and other places we deem appropriate. We will use information in accordance with the Privacy Policy under which the information was collected. All Privacy Policy changes are effective immediately upon posting. The last date on which this Privacy Policy has been updated is noted below.

## **CONTACT INFORMATION**

Questions or comments regarding this Privacy Policy should be directed to DRS using the following contact information:

Eric G. Rice, CEO

[Eric@dataregistryservices.com](mailto:Eric@dataregistryservices.com)

Direct: 412-877-1113

Fax: 888-573-2526

## **CHILDREN**

Children Under The Age of 13 - We do not knowingly collect personal information from children under 13 or knowingly allow such persons to log in to the Site. If you are under 13, do not use or provide any information on this Site or on or through any of its features or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information as soon as practicable. If you believe we might have any information from or about a child under 13, please contact us.

For more information on your health information privacy and security rights, or on the HIPAA Privacy and Security Rules, visit the HHS Office for Civil Rights.

Effective as of: **November 1, 2015**