



# DAPS Health Privacy Policy

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DAPS Health, LLC (“we” or “us”) is committed to protecting your privacy. This privacy policy (and as amended from time to time as posted on our website at [www.dapshealth.com/privacy](http://www.dapshealth.com/privacy)) (“ Privacy Policy”) describes how we collect, protect, store, use, disclose, and transfer information through our DAPS Health mobile app software (“Mobile App”), [dapshealth.com](http://dapshealth.com) website (“Website”), documentation, and related services (collectively, the “Services”).

## Acknowledgement and Consent

By accessing our Website, installing the Mobile App, or using the Services, you acknowledge that you accept the practices and policies described in this Privacy Policy (and as updated from time to time), and you hereby consent that we may collect, use, and share your information as described herein. Your continued use of our Mobile App, Website, or Services after we make changes is deemed to be acceptance of those changes, so please check our Website periodically for updates. You may withdraw your consent to our processing of your Personal Information (defined below) at any time. However, withdrawing consent may result in your inability to continue using some or all of the Services. Please note that if you have opted not to receive legal notice emails from us (or you haven’t provided us with your email address), those legal notices will still govern your use of the Services, and you are still responsible for reading and understanding them. If you use the Services after any changes to the Privacy Policy have been posted, that means you agree to the new Privacy Policy, including all of the changes. Use of information we collect now is subject to the Privacy Policy in effect at the time such information is collected.

## Intended Users

The Services are directed solely to persons 18 years of age or older, and we do not knowingly gather Personal Information from visitors who are under 18. If we become aware that we have gathered Personal Information from a person under 18, then we will attempt to delete such information as soon as possible. If you believe that we have gathered Personal Information from a person under 18, please contact us at [info@dapshealth.com](mailto:info@dapshealth.com).

## Collection of Information

This Privacy Policy covers our treatment of personally identifiable information. This is information which may be connected to you specifically as the individual to whom the information relates. Such information may include name, mailing

address, email address, mobile phone number, mobile device ID number, healthcare-related information, biometric information, and other nonpublic information which specifically identifies you, defined as personally identifiable information (or similar term) by applicable laws (“Personal Information”). If you are a European citizen or resident, the definition of Personal Information is different, so, please see the section toward the end of this Privacy Policy. Personal Information does not include your personally identifiable information that has been deidentified, pseudonymized, anonymized, aggregated and/or otherwise processed so as to be unidentifiable in such a way that the data can no longer be attributed to a specific individual (by reasonable means) without the use of additional information, and where such additional information is kept separate and under adequate security to prevent unauthorized re-identification of a specific individual such that one could not, using reasonable efforts, link such information back to a specific individual (the foregoing in this sentence being referred to as “De-Identified Information”). When registering to use the Services and creating a user account, we may also ask you to provide certain information about yourself, such as your name, email address, and we assign you a user name and password (“Personal Contact Information”). Your Personal Contact Information, together with any other information we gather through the Services that may be used to identify, contact, or locate you individually, is collectively referred to herein as your “Personal Information.”

### **HIPAA (Meaning, the privacy rules under the Health Insurance Portability and Accountability Act)**

We are dedicated to maintaining the privacy and integrity of protected health information that we receive as part of your usage of DAPS Health (“PHI”). PHI is Personal Information that we receive that relates to (a) your past, present or future physical or mental health or condition, (b) the provision of healthcare to you, or (c) your past, present or future payment for the provision of healthcare, which is created, received, transmitted or maintained by DAPS Health. This Privacy Policy describes how we protect your privacy as a visitor to or general user of our Site, our Mobile App and Services. You may have additional rights under state and federal laws (including HIPAA) with respect to the access to, use, and disclosure of Personal Information that constitutes PHI.

### **Information We Collect About You and How We Collect It**

We collect several types of information from and about you.

**Information You Provide to Us.** The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to use our Website, subscribing to or purchasing our Services, e-newsletters, posting material (where permitted) or requesting further Services. We may also ask you for information when you report a problem with our Website.
- Records and copies of your correspondence (including email addresses), if you contact us.

- Your responses to surveys that we might ask you to complete for research or quality improvement purposes.
- Your search queries on the Website.

**Information We Collect Through Automatic Data Collection Technologies.** As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions and patterns, including:

- Details of your visits to our Website, including, but not limited to, traffic data, logs and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, browser type, clickstream patterns, the URL of the most recent website you visited before coming to our Website, the amount of time you spent on our Website, and the pages you viewed while on our Website.

The information we collect automatically is statistical data and may include Personal Information, but we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties. It helps us to improve our Website and to deliver a better and more personalized service, including, but not limited to, by enabling us to: (a) estimate our audience/visitor size and usage patterns; (b) store information about your preferences, allowing us to customize and improve our Website; (c) speed up your searches; and/or, (d) recognize you when you return to our Website.

The technologies we use for this automatic data collection may include cookies, local storage cookies, web beacons, pixel tracking, GIF and/or IP address. Each of these is discussed below.

#### *Cookies (or browser cookies)*

A cookie is a small file placed on the hard drive of your computer or mobile device. It may contain certain data, including, but not limited to: the name of the server that has placed it there, an identifier in the form of a unique number, and, an expiration date (some cookies only). Cookies are managed by the web browser on your computer (Internet Explorer, Firefox, Safari or Google Chrome).

Different types of cookies which have different purposes are used on our Website.

#### *Essential Cookies*

These cookies are essential to allow you to browse our Website and use its functions. Without them, services such as shopping baskets and electronic invoicing would not be able to work.

#### *Performance Cookies*

These cookies collect information on the use of our Website, such as which pages are consulted most often. This information enables us to optimize our Website and simplify browsing. Performance cookies also enable our affiliates and partners to find out whether you have accessed one of our Websites from their

site and whether your visit has led to the use or purchase of a product or Service from our Website, including the references for the product or Service purchased. These cookies do not collect any information which could be used to identify you. All the information collected is aggregated, and therefore anonymous.

#### *Functionality Cookies*

These cookies enable our Website to remember the choices you have made when browsing. We can also remember your preferences, such as the text size, font and other customizable aspects of the Website. Functionality cookies may also be able to keep track of the products or videos consulted to avoid repetition. The information collected by these cookies cannot be used to identify you and cannot monitor your browsing activity on sites which do not belong to us.

It is possible that you will come across third-party cookies on some pages of sites that are not under our control.

You may refuse to accept browser cookies by activating the appropriate setting in your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.

We also use cookies to implement tracking technology on our Website. This allows us to display advertising that is tailored to you on our Website which parts of our content interest you the most and which Service categories you request. This tracking uses De-Identified Personal Information data). We will not combine this data with your other Personal Information without your express permission. Some of our contracted vendors and affinity partners are allowed to place cookies on our Website. Those companies may also provide you with the option of preventing the use of cookies in the future. For more information, contact the relevant third-party provider.

At any time, you can prevent the use of cookies in the future. However, if you do, your experience on our Website may be affected.

**Local Storage Cookies.** Certain features of our Website may use local stored objects (or Adobe Flash cookies) to collect and store information about your preferences and navigation to, from and on our Website. Local storage cookies are not managed by the same browser settings as are used for browser cookies.

**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).

**GIF.** We may use tiny images known as clear GIFs to track behavior of users, including statistics on who opens our emails.

**IP Address.** Our servers automatically record certain log file information reported from your browser when you access the Services. These server logs may

include information such as which pages of the Service you visited, your internet protocol (“IP”) address, browser type, and other information on how you interact with the Services. These log files are generally deleted periodically.

Collectively, the information in this section is referred to as “Usage and Analytics Information.”

### **Information We Collect from Third Parties**

We may collect information that others provide about you when they use the Website or obtain information from other sources and combine that with information we collect through the Website.

**Google Analytics.** We use, and some of our third-party service providers may use, Google Analytics (click for link to Google’s website) or other analytics service to help us understand use of our Services. Such service providers may place their own cookies in your browser. This Privacy Policy covers use of cookies by us only and not the use of cookies by third parties.

**Google AdSense Advertising.** We use Google AdSense Advertising (or other search engine or display network advertising) on our website. Google’s advertising requirements can be summed up by Google’s Advertising Principles (click for link to Google’s website). They are put in place to provide a positive experience for users. We have implemented the following: (a) Remarketing with Google AdSense and (b) Google Display Network Impression Reporting.

Users can set preferences for how Google advertises to you using the Google Ad Settings page. Alternatively, you can opt out by visiting the Network Advertising Initiative Opt Out page or by using the Google Analytics Opt Out Browser add-on.

**Data, Diagnostic & Login Information.** You may be able to create, upload, publish, transmit, distribute, display, store or share information, data, text, graphics, video, messages or other materials using our Services (this is collectively referred to below as “Data”). Some of this Data may be stored and maintained on our or our service provider’s servers. If you run into technical errors in the course of using the Services, we may request your permission to obtain a crash report along with certain logging information from your system documenting the error (“Diagnostic Information”). Such information may contain information regarding your operating system version, hardware, browser version, and your email address, if provided. Additionally, certain login information may be maintained in a cookie stored locally on your personal computing device (i.e., not on a server) in order to streamline the login process (“Login Information”).

**Biometric Information.** Certain features of the Services may actively record biometric information about yourself as you use the Services. This tracking is accomplished through integration with your mobile device and the Mobile App. Such information is referred to as “Biometric Information.”

**Geo-Location Information.** We do not collect any information regarding your real-time geo-location while using the Services.

# Use of Information

Information Collected	Use
<p><b>Personal Information</b></p>	<p>We use your Personal Information to manage your account, to provide the Services, to maintain our customer/visitor lists, to respond to your inquiries or request feedback, for identification and authentication purposes, to send you administrative notifications (such as security, support or maintenance advisories), for service improvement, and to address issues like malicious use of the Services.</p> <p>We may also use your Personal Information that you provide to us (excluding Biometric information) to notify you about new features in the Services, and to send you general information about us and/or our partners.</p> <p>We do not actively collect Personal Information for the purpose of sale of such information in a way that specifically identifies the individual (i.e. we don't sell customer lists).</p>
<p><b>Data, Diagnostic Information and Login Information</b></p>	<p>We use this information for the purpose of administering and improving our Services to you.</p>
<p><b>Biometric Information</b></p>	<p>We use this information to administer and improve our Services to you, such as by providing you with health-related feedback. We may also use your Biometric Information in a de-identified, aggregated, and anonymous way to monitor and analyze use of the Services, to increase the Services' functionality and user-friendliness, and for the purpose of medical research.</p> <p>We do not disclose to third parties user data gathered from the DAPS Health APIs or from health-related human subject research for advertising or other use-based data mining purposes other than improving health, or for the purpose of health research. We do not use or disclose to third parties your Biometric Information for the purpose of advertising or marketing in any way.</p> <p>We do not share user data acquired via the DAPS Health APIs with third parties without user consent.</p>
<p><b>Usage and Analytics Information</b></p>	<p>We use this information to administer and improve our Services to you. We may also use your Usage and Analytics Information in a de-identified, anonymous way in conjunction with an analytics service such as Google Analytics to monitor and analyze use of the Services, for the Services' technical administration, to increase the Services' functionality and user-friendliness, and to verify users have the authorization needed for the Services to process their requests.</p>

Other purposes we may use your Personal Information or other information include:

- To present our Website and its contents to you.
- To provide you with information on products or services that you request from us.
- To provide you with services that you have requested.
- To process transaction payments (including, but not limited to, rental or other service fees, membership dues and subscriptions, registration fees, voluntary contributions, and payments, refunds and reimbursements for any products or services that you choose to purchase from us).

- To provide you with notices about your account, including expiration and renewal notices.
- To send you emails and newsletters with product, service, company, and other information.
- To communicate with you regarding information, features or offers that we believe will be of interest to you.
- To respond to your questions or other requests.
- To contact you with regard to the Website.
- To process any applications, changes to your account information.
- To process other information or Personal Information that you submit through this Website.
- To notify you about changes to our Website, our policies, terms or any products or Services we offer or provide through it.
- To allow you to participate in interactive features on our Website.
- To ask for ratings and reviews of our Website, Services, and/or products.
- To provide access to restricted parts of our Website.
- To request your participation in surveys, focus groups, or other initiatives which help us to gather information used to develop and enhance our products and Services.
- To determine eligibility for membership, credentials, designations, or volunteer opportunities.
- For event registration, scheduling, administration and related purposes.
- To provide verification of event attendance.
- To enhance and improve our products and Services, for example, by performing internal research, analyzing user trends and measuring demographics and interests.
- For internal purposes, such as Website and system administration or internal audits and reviews.
- To comply with applicable law(s) (for example, to comply with a search warrant, subpoena or court order) or to carry out professional ethics/conduct investigations.
- For analyzing how the Services are used, diagnosing Service or technical problems, maintaining security, and personalizing content.
- To operate, maintain, and provide to you the features and functionality of the Services.
- To provide statistics about the usage levels of the Website and other related information to reputable third parties, but these statistics will not include information which will allow you to be identified.

- To fulfill any other purpose for which you provide it.
- In any other way we may describe when you provide the information.

If we plan to use your Personal Information in the future for any other purposes not identified above, we will only do so after informing you by updating this Privacy Policy. See further the section of this Privacy Policy entitled “Amendment of this Privacy Policy”.

## **Our Service Providers**

From time to time we may need to employ third parties to help us provide the Services. These third parties may have limited access to databases of user information or registered member information solely for the purpose of helping us to provide the Services and they will be subject to contractual restrictions prohibiting them from using the information about our members for any other purpose. Such agents or third parties do not have any rights to use Personal Information beyond what is absolutely necessary to assist us in providing the Services.

## **Required Disclosures**

Except as otherwise described in this Privacy Policy, we will not disclose Personal Information to any third party unless required to do so by law, court order, legal process, or subpoena, including to respond to any government or regulatory request, or if we believe that such action is necessary to (a) comply with the law, comply with legal process served on us or our affiliates, subsidiaries, contracted vendors, or affinity partners, or investigate, prevent, or take action regarding suspected or actual illegal activities; (b) enforce our terms and conditions of use (including for billing and collection purposes); (c) take precautions against liability; (d) investigate and defend ourselves against any third-party claims or allegations; (e) assist government enforcement agencies or to meet national security requirements; (f) to protect the security or integrity of our Website, our Services, or any software we provide related thereto; or, (g) exercise or protect the rights, property, or personal safety of us, our users or others.

We will attempt to notify you about these requests unless: (i) providing notice is prohibited by the legal process itself, by court order we receive, or by applicable law, or (ii) we believe that providing notice would be futile, ineffective, create a risk of injury or bodily harm to an individual or group, or create or increase a risk of fraud upon us, our users, our Website, or our Services. In instances where we comply with legal requests without notice for these reasons, we will attempt to notify that user about the request after the fact if we determine in good faith that we are no longer legally prohibited from doing so and that no risk scenarios described in this paragraph apply.

It is likely that the identity and categories of such third parties will change during the life of your account. We require that our third-party service providers only use your Personal Information as necessary to provide the requested services to us and each service provider is subject to a set of terms consistent with the applicable portions of this Privacy Policy.

## **Transfer, Successors, and Assignees**

You consent to our disclosure of your Personal Information and other information to a potential or actual buyer of our company or other successor for the purpose of considering a merger, divestiture, restructuring, reorganization, dissolution, or sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or other proceeding, in which Personal Information held by us is among the assets transferred. You agree to and do hereby consent to (and shall not object to) our assignment, conveyance, transfer, and/or license (whether by contract, merger or operation of law) of any or all of our rights to your Personal Information and your consents, in whole or in part, and other information, with or without notice to you and without your further consent.

## **Security**

The security of your Personal Information is important to us. We use commercially reasonable efforts to store and maintain your Personal Information in a secure environment. We take technical, contractual, administrative, and physical security steps designed to protect Personal Information that you provide to us. We have implemented procedures designed to limit the dissemination of your Personal Information to only such designated staff as are reasonably necessary to carry out the stated purposes we have communicated to you.

The safety and security of your information also depends on you. You should maintain good internet security practices. Where you have password-protected access to certain parts of the Website or Services, you are responsible for keeping this password confidential. You should not share your password with anyone. You must prevent unauthorized access to your account and Personal Information by selecting and protecting your password appropriately and limiting access to your computer or device and browser by signing off after you have finished accessing your account. If your email account or Facebook account is compromised this could allow access to your account with us if you have given us those details and/or permitted access through those accounts. If your email account is compromised it could be used to ask us to reset a password and gain access to your account with us. If you think that any of your accounts have been compromised you should change your account credentials with us, and in particular make sure any compromised account does not allow access to your account with us. The information you share in public areas may be viewed by other users. We'll never email you to ask for your password or other account login information. If you receive such an email, please send it to us so we can investigate. For any security-related issues, please email us at [info@dapshealth.com](mailto:info@dapshealth.com).

## **Sharing Information with Third Parties**

You may be able to share Personal Information with third parties through use of the Services. The privacy policies of these third parties are not under our control and may differ from ours. The use of any information that you may provide to any third parties will be governed by the privacy policy of such third party or by your

independent agreement with such third party, as the case may be. If you have any doubts about the privacy of the information you are providing to a third party, we recommend that you contact that third party directly for more information or to review its privacy policy.

Broadly stated, we may disclose your Personal Information, in whole or in part, with third parties who perform services on our behalf for the purpose of providing or improving the Services to you. We disclose Personal Information to the following types of third parties, and for one or more the following purposes:

- Hosting providers for the secure storage and transmission of your data
- Payment solution providers for the secure processing of payments you provide to us
- Technology providers who assist in the development and management of our Website or our mobile app
- Fulfillment and shipping vendors for the fulfillment of our products and Services
- Our volunteers or committee members who perform various functions on our behalf

For Personal Information comprising “Protected Health Information” under HIPAA:

Release	Personal Information	De-Identified Data
Do we release your PI for the following purposes?		
Marketing and advertising	No	No
Medical and pharmaceutical research	No	Yes
Reporting about our company and our customer activity	No	Yes
To your insurer and employer	No	No
For developing software applications	No	No
Do we restrict what third party service providers can do with your PI?	Yes	Yes
Do we stop releasing your PI if you close or transfer an account?	Yes	Yes
Do we store PI only in the US?	Yes	Yes

**Retention**

We will keep your Personal Information for as long as it remains necessary for the identified purpose or as required by law, which may extend beyond the termination of our relationship with you. We may retain certain data as necessary for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery, or if required by law. All retained Personal Information will remain subject to the terms of this Privacy Policy. Please note that if you request that your Personal Information be removed from our databases, it may not be possible to completely delete all of your Personal Information due to technological and legal constraints.

## Accessing and Correcting Your Information

You can review and change your Personal Information by logging into the Mobile Portal and visiting your account page.

## Opting Out

You can opt out of receiving emails by one of the following methods:

- You can opt out of receiving emails from a particular provider by clicking on the “Unsubscribe” button in an email reminder you receive.
- You can opt out of receiving emails and texts by emailing us and indicating that you wish to no longer receive emails.
- You can opt out of receiving text reminders to a particular mobile phone number by replying STOP to a text you receive, which will stop sending text reminders from all providers to that phone number.

By providing us with your email address (including by “following,” “liking,” linking your account to our Service or other services, etc., on a third party website or network), you consent to our using the email address to send you Service-related notices by email, including any notices required by law, in lieu of communication by postal mail. You also agree that we may send you notifications of activity on the Service to the email address you give us, in accordance with any applicable privacy settings. We may use your email address to send you other messages or content, such as, but not limited to, newsletters, additions or changes to features of the Service, or special offers. If you do not want to receive such email messages, you may opt out by emailing us your opt-out request or by clicking “unsubscribe” at the bottom of our e-newsletter. Opting out may prevent you from receiving email messages regarding updates, improvements, special features, announcements, or offers. You may not opt out of Service-related emails.

You can add, update, or delete information as explained above. When you update information, however, we may maintain a copy of the unrevised information in our records. You may request deletion of your account by emailing us. It is your responsibility to maintain your current email address with us

## Your California Privacy Rights

Online Privacy Protection Act (“CalOPPA”). Under California Civil Code Sections 1798.83-1798.84, California residents are entitled to ask us annually for a notice identifying the categories of Personal Information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties with whom the business has shared such information during the immediately preceding calendar year. Please note that not all information sharing is covered by CalOPPA, and we will only include in our response information relating to our sharing practices for covered information. To obtain information under CalOPPA from us, please contact us, or, see more at the CalOPPA website [here](#).

## **Amendment of this Privacy Policy**

We reserve the right to change this Privacy Policy at any time. If we decide to change this Privacy Policy, we will post the new version on our Website or provide appropriate notice. Any non-material change (such as clarifications) to this Privacy Policy will become effective on the date the updated version is posted. Unless stated otherwise, our current Privacy Policy applies to all Personal Information that we have about you and your account. The date on which the latest update was made is indicated at the top of this document. We recommend that you print a copy of this Privacy Policy for your reference and revisit this policy from time to time to ensure you are aware of any changes. Your continued use of the Services signifies your acceptance of any changes.

## **Access and Accuracy**

You have the right to access the Personal Information we hold about you in order to verify the Personal Information we have collected in respect to you and to have a general account of our uses of that information. Upon receipt of your written request, we will provide you with a copy of your Personal Information, although in certain limited circumstances we may not be able to make all relevant information available to you, such as where that information also pertains to another user. In such circumstances we will provide reasons for the denial to you upon request. We will endeavor to deal with all requests for access and modifications in a timely manner.

We will use reasonable efforts to keep your Personal Information accurate and up-to-date, and we will provide you with mechanisms to update, correct, delete or add to your Personal Information as appropriate. As appropriate, this amended Personal Information will be transmitted to those third parties to which we are permitted to disclose your information. Having accurate Personal Information about you enables us to give you the best possible service.

## **Contact Us**

You can help by keeping us informed of any changes such as a change of your Personal Information. If you would like to delete your account, please notify us at [info@dapshealth.com](mailto:info@dapshealth.com). If you would like to access your information, if you have any questions, comments or suggestions or if you find any errors in our information about you, please contact us at [info@dapshealth.com](mailto:info@dapshealth.com). If you have a complaint concerning our compliance with applicable privacy laws, we will investigate your complaint and we will take appropriate action, as we deem necessary.

## **The Follow Sections Apply Only to Citizens and Residents of the EEA and Switzerland:**

The following provisions apply to you only if you are a European or Swiss citizen or resident. If you are a European citizen or resident of the European Economic Area ("EEA"), Switzerland, or other regions with laws governing data collection and use that may differ from the laws in the United States, please note that we may transfer your information to a country or jurisdiction that does not have the

same data protection laws as your jurisdiction. We may do so to process your information by staff operating outside the EEA who works for us or for one of our service providers.

All processing of your Personal Information is performed in accordance with privacy rights and regulations, in particular, (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Information and on the free movement of such data, known as the General Data Protection Regulation (“GDPR”), and our processing will take place in accordance with the GDPR. For purposes of the GDPR, we will be the “data controller” of Personal Information (referred to in the GDPR as “Personal Data”, and which is defined differently than in this Privacy Policy) we collect through the Website, unless we collect such information on behalf of a “data controller” in which case we will be a “data processor.” This Privacy Policy does not apply to websites, applications or services that do not display or link to this Privacy Policy or that display or link to a different privacy policy. For EU residents and citizens only, to the extent any definition in this Privacy Policy conflicts with a definition under the GDPR, the GDPR definition shall control.

**What is our legal basis for processing Personal Data (EEA and Swiss visitors only)?** If you are a visitor from the EEA or Switzerland, our legal basis for collecting and using the Personal Data described above will depend on the Personal Data concerned and the specific context in which we collect it. However, we will normally collect Personal Data from you only where we need the Personal Data to perform Services for you for which you have contracted with us, or where the processing is in our legitimate interests or rely upon your consent where we are legally required to do so and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect Personal Data from you or may otherwise need the Personal Data to protect your vital interests or those of another person.

### **Your Data Rights Under GDPR**

Your rights under GDPR include the following:

**The right to access** - Upon request, we will confirm any processing of your Personal Information, and provide you with a copy of that Personal Information in an acceptable machine-readable format.

**The right to rectification** - You have the right to have us correct any inaccurate Personal Information or to have us complete any incomplete Personal Information.

**The right to erasure** - You may ask us to delete or remove your Personal Information and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other interests outweigh your right to deletion).

**The right to restrict processing** - You have the right to ask us to suppress the processing of your Personal Information, but we may still store your Personal Information. See below for more information.

**The right to object to processing** - You have the right to object to your Personal Information used in the following manners: (a) processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); (b) direct marketing (including profiling); and, (c) processing for purposes of scientific/historical research and statistics. See below for more information.

**The right to data portability** - You have the right to obtain your Personal Information from us that you consented to give us or that is necessary to perform fulfillment of member benefits with you. We will give you your Personal Information in a structured, commonly used and machine-readable format.

**The right to complaint to a supervisory authority** - You have the right to file a complaint with a supervisory authority, in particular in the European member state of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of Personal Information relating to you infringes upon your rights.

**The right to withdraw consent** - We rely on your consent to process your Personal Information; you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing based on your prior consent.