# **Together TakeMeHome.org Website Privacy Policy**

Last Updated: May 15, 2023

This privacy policy discloses the privacy practices for together.takemehome.org (the "Site"). This website privacy policy applies to information collected by the Site and applies to visitors and users.

This privacy policy does not apply to employees and job candidates or to contractors. This privacy policy notifies you of the following:

- 1. What personally identifiable information is collected from you through the Site, how it is used and with whom it may be shared.
- 2. What choices are available to you regarding the use of your data.
- 3. The security procedures in place to protect the misuse of your information.
- 4. How you can correct any inaccuracies in the information.
- 5. Emory University and its affiliates ("we") are the sole owners of the information collected on the Site.

# INFORMATION COLLECTION, USE, AND SHARING

## **Information We Collect**

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information").

This Supplemental Notice for California Residents only applies to our processing of personal information that is subject to the California Consumer Privacy Act of 2018 ("CCPA"). The following table describes the categories of personal information we have collected and whether [Company] disclosed that personal information for a business purpose (e.g., to a service provider) in the preceding 12 months.

Category	Examples
A. Identifiers.	A real name, postal address, Internet Protocol
	address, email address, alias.
B. Personal information categories listed	Name, physical characteristics or description,
in the California Customer Records	address, telephone number, medical
statute (Cal. Civ. Code § 1798.80(e)).	information, order history.
C. Protected classification	Age, race, color, medical condition, physical
characteristics under California or	or mental disability, sex and gender, sexual
federal law.	orientation, veteran, or military status.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from our participants. For example, from forms completed by our participants or from emails and phone conversations with our participants.
- Indirectly from our participants, their agents, and the laboratory partners.
- Indirectly from activity on the Site. For example, website usage details are collected automatically.
- From third-parties that interact with us in connection with the services we perform.

## **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to send you an HIV self-test.
- To provide you with information, products, or services that you request from us.
- To provide you with email alerts, and other notices concerning our products or services, or events or news, that may be of interest to you.
- To improve the Site and present its contents to you.
- For testing, research, analysis, and product development.
- As necessary or appropriate to protect our legal rights, property, safety, or the legal rights, property, or safety of our participants or other persons.
- To respond to law enforcement requests and as required by applicable law or court order.
- As described to you when collecting your personal information.
- To evaluate or conduct changes to the structure, organization, or operation of our organization.

## **Sharing Personal Information**

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

Category A: Identifiers.

Category B: California Customer Records personal information categories.

Category C: Protected classification characteristics under California or federal law.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

We do not sell or rent any personal information.

We share aggregated demographic information with our partners and advertisers. This is not linked to any personal information that can identify any individual person.

Information collected is sent to our shipping and fulfillment partner, ShipBob. Their privacy policy can be found here: <a href="https://www.shipbob.com/privacy-policy/online-platform/">https://www.shipbob.com/privacy-policy/online-platform/</a>

Information collected may also be sent to <u>MailChimp</u>, <u>Twilio</u>, and <u>HelpScout</u> services as part of our customer service and communications.

As part of this program, HIV and STI Testing and Care-Related Information, including personal information (e.g., your name, date of birth and date you ordered the HIV self-test), will be reported in a list of program participants to state and local Departments of Public Health ("DPH") for the prevention and control of spreading diseases.

We may request anonymized, aggregated data of program participants' laboratory results from DPH in order to confirm self-reported HIV test results and linkage to care. We will NOT obtain your individually identifiable health information from DPH, only the total number of new HIV diagnoses and HIV care initiations among our list of participants.

### Opt-Out or Unsubscribe

You may contact us at (628) 899-4662 or <u>support@together.takemehome.org</u> to opt out of any future contacts from us at any time.

# Requests and Contact Information

You may, under applicable laws, have a right to access, correct, restrict, update, modify or delete your personal information that you have previously provided to us at any time. In your request, please make clear what personal information you would like to have changed, whether you would like to have your personal information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your personal information.

We will evaluate requests to amend, delete, or obtain personal information on a case-by-case basis, and in accordance with our contractual and legal obligations. For your protection, we may only implement requests with respect to the personal information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. In connection with your request, we may request additional information to verify your identity and obtain sufficient information to understand and respond

to the request. We will not discriminate against you for making requests in connection with your personal information. We will try to comply with your request as soon as reasonably practicable.

We store the personal information we collect as described in this privacy policy for as long as you use our Services, or as necessary to fulfill the purpose(s) for which it was collected, provide our Services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable laws, or based upon other criteria, including, but not limited to, the sensitivity and volume of such data. Additionally, we endeavor to retain all such personal information in accordance with legal requirements. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

For more information on how we collect and process your Personal Information, or if you have any requests or complaints, please contact the Emory University Office of Ethics and Compliance @emory.edu or (404) 727-2398.

### Cookies

There are "cookies" used on the Site. A cookie is a piece of data stored on a site visitor's hard drive to help us improve your access to our site and identify repeat visitors to our site. For instance, when we use a cookie to identify you, you would not have to log in a password more than once, thereby saving time while on our site. Cookies can also enable us to track and target the interests of our users to enhance the experience on our site. Usage of a cookie is not linked to any personally identifiable information on the Site.

In order to use the Site, you agree to allow us to collect cookies for us to process your order.

### **Google Analytics**

The Site uses Google Analytics, including Google Analytics first-party cookies, to collect advertising data on website visitors. This data may be used to inform future advertising campaigns or other marketing content.

**Visitors** learn Google's practices can about by going to https://www.google.com/policies/privacy/partners/, or you may choose to opt out of these Google Analytics Advertising Features using opt-out tools such as: https://tools.google.com/dlpage/gaoptout/.

## IP Address

Your Internet Protocol (IP) Address is a number that is automatically assigned to your computer by your Internet Service Provider. An IP Address may be identified and logged automatically in our server log files whenever a user accesses the Site. We automatically may collect information regarding your use of our Site, such as pages that you visit before, during and after using our

Site, information about the links you click, the types of content you interact with, the frequency and duration of your activities, and other information about how you use our Site.

## **FORMS**

Users of the Site may be asked to complete registration forms for actions such as ordering an HIV self-test. During registration, a user is required to give certain information (such as name and email address).

To complete these forms, you must provide contact information (like name, shipping address, and phone number).

#### LINKS

The Site contains links to other websites. Please be aware that we do not control and are not responsible for the content or privacy practices of such other websites. We encourage our users to be aware when they leave the Site and to read the privacy statements of any other website that collects personally identifiable information. We do not endorse, screen, or approve, and are not responsible for, the privacy practices or content of such other websites or applications. Providing personal information to third-party websites or applications is at your own risk.

## **SECURITY**

We take precautions to protect your information. Unfortunately, no system is 100% secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unauthorized access, use, disclosure, or loss of personal information. By using our Site or providing personal information to us, you agree that we may communicate with you electronically regarding security, privacy, and administrative issues relating to your use of our Services. If we learn of a security system's breach, we may attempt to notify you electronically by posting a notice on our Services, by mail, or by sending an email to you.

When you submit sensitive information via the Site, your information is protected both online and offline.

Wherever we collect sensitive information, that information is encrypted and transmitted to us in a secure way. You can verify this by looking for a closed lock icon at the bottom of your web browser, or looking for "https" at the beginning of the address of the web page.

While we use encryption to protect sensitive information transmitted online, we also protect your information offline. Only employees who need the information to perform a specific job are granted access to personally identifiable information. The computers/servers in which we store personally identifiable information are kept in a secure environment.

### **USE OF SITE BY MINORS**

The Site is not directed to individuals under the age of seventeen (17) and, we do not knowingly collect personal information from individuals under the age of 17. If you are a parent or guardian and believe your child has uploaded personal information to our site without your consent and/or wish to review information collected from your child, or have that information modified or deleted, you may contact us as described in "Requests and Contact information" above. If we become aware that a child has provided us with personal information in violation of applicable law, we will delete any personal information we have collected, unless we have a legal obligation to keep it, and terminate the child's account.

## **JURISDICTIONAL ISSUES**

The Site is controlled and operated by us from the United States and is not intended to subject us to the laws or jurisdiction of any state, country, or territory other than that of the United States.

#### **UPDATES**

We may revise this Privacy Policy from time to time in our sole discretion. If there are any material changes to this Privacy Policy, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Privacy Policy/Notice if you continue to use our Services after the new Privacy Policy takes effect.