

# Children’s Hospital Medical Center – Project SEARCH Website Privacy Policy

*Last Revised: February 26, 2024*

## 1. GENERAL

We know that your privacy is important to you, and we work hard to earn and keep your trust. Cincinnati Children’s Hospital Medical Center collectively with its subsidiaries and affiliates, (“Company,” “we,” “us,” and “our”), respects your privacy and is committed to protecting your privacy through our compliance with this Privacy Policy (the “Policy”). The words “you” and “your” refer to you as a user of the Website (defined below), either as a visitor, registered user (e.g., teacher or employment professional using Project SEARCH), or employee of the Company.

This Policy describes:

- The types of information we collect from you or that you may provide when you visit our Project SEARCH website(s) available at: <https://projectsearch.us/> as well as any websites and blogs directly owned by the Company where this Policy is linked (collectively, our “Website”).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This Policy applies to information we collect on the Website or in emails and other electronic messages between you and the Website, and information gathered when you interact with our advertising on third-party websites if such advertisements include links to this Policy.

This Policy does not apply to information collected by us offline or through any other means, including on any other website operated by the Company or any third party, or information collected by any third party through any application or content (including advertising) that may link to or be accessible from the Website (for further information, see below, “Third-party Websites”).

Additionally, no protected health information (“PHI”) as that term is defined under the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”) is collected on this Website.

Please read this Policy carefully to understand our practices regarding your information and how we will treat it. If you do not agree with our policies and practices, then please do not use our Website. By using our Website, you agree to the terms of this Policy. This Policy may change from time to time (see below, “Changes to this Policy”). Your continued use of our Website after we make changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

## 2. TERMS OF USE; OTHER POLICIES

This Policy is incorporated by reference and should be read in conjunction with the [Company’s Terms of Use](#).

### 3. THE INFORMATION WE COLLECT

*Personal Information.* To ensure that we provide you with the best possible experience, we will store, use, and disclose personal information about you in accordance with this Policy. Personal information is information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular user, household or device (“Personal Information”). The Personal Information that we may receive and collect depends on what you do when you visit our Website.

*Aggregated and De-Identified Data.* We may also collect, use and disclose aggregated and de-identified data such as statistical or demographic data for any purpose. Aggregated and de-identified data could be derived from your Personal Information but is not considered Personal Information under applicable law as this data will not directly or indirectly reveal your identity. However, if we combine or connect aggregated or de-identified data with your Personal Information so that it can directly or indirectly identify you, we treat the combined data as Personal Information which will be used in accordance with this Policy.

*Information of Other Individuals.* You may have the opportunity to provide information of other individuals. When providing such information, you are solely responsible for obtaining the necessary consents and authorizations from any individuals in accordance with applicable data security laws and regulations, and the Company shall not be responsible or held liable for your failure to obtain the necessary consents.

*Free-Text Boxes.* The information that you provide in each case will vary. In some cases, you may be able to provide Personal Information via email or free text boxes, such as contacting the Company to request further information. When providing your Personal Information, please provide only relevant information and do not provide unnecessary sensitive information, such as Social Security numbers, credit card information or other sensitive personal data, unless required for our services.

*Username and Password; Other Sources.* We may ask you to create a username and password that should only be known to you. When you provide this information to us, you are no longer anonymous. Additionally, we may receive information about you from other sources and add it to the information you have provided to us.

#### (a) Information We May Collect on the Website

You may have the opportunity to provide Personal Information on our Website, including but not limited to:

- *Personal identifiers:* first and last name; postal address; telephone number; email address.
- *Sensitive Personal Information:* Social Security number, driver’s license, state identification card, passport number, account log-in, and financial information, including bank account information, credit card or other payment information.
- *Geolocation data:* Physical location or movements.
- *Internet activity:* browsing history; search history; information in relation to our Website.

- *Professional or employment related information:* Current or past job history in relation to a resume.

We may obtain the Personal Information listed above from the following categories of sources:

- *Directly from you.* For example, when you:
  - register yourself with the Website;
  - subscribe to one of our e-newsletters;
  - review or comment on one of our products;
  - submit a job application; or
  - otherwise communicate with us, such as contacting us for more information.
- *Indirectly from you.* For example, through information we collect from you in the course of providing our services to you, or information provided to us by a registered user who initially collected the information from you.
- *Directly and indirectly from activity on our Website.* For example, from Website usage details that are collected automatically. For more information on automatic information collection, please review the “Automated Information Collection” section below.

#### 4. AUTOMATED INFORMATION COLLECTION

*Website.* In addition to the information that you provide to us, we may also collect information about you during your visit to our Website. We collect this information using automated tools that are detailed below. These tools may collect information about your behavior and your computer system, such as your internet address (IP Address), the pages you have viewed, and the actions you have taken while using the Website. Some of the tools we use to automatically collect information about you may include:

- (a) Cookies. A “cookie” is a small data file transmitted from a website to your device’s hard drive. Cookies are usually defined in one of two ways, and we may use either (or both) of them:
  - (1) session cookies, which do not stay on your device after you close your browser, and
  - (2) persistent cookies, which remain on your device until you delete them or they expire.

We may use the following categories of cookies on our Website.

- i. **Strictly Necessary Cookies.** These cookies are essential in order to enable you to move around the Website and use its features. Without these cookies, services you have requested cannot be provided.
- ii. **Performance Cookies.** These cookies collect anonymous information on how you use our Website to help us understand how you arrive at our Website, browse or use our Website and highlight areas where we can

improve, such as navigation. The data stored by these cookies never shows personal details from which your individual identity can be established.

- iii. **Functionality Cookies.** These cookies remember choices you make such as the country from which you visit our Website, your preferred language, and your search parameters. This information can then be used to provide you with an experience more appropriate to your selections and to make your visits to our Website more tailored to your preferences. The information in these cookies may be anonymized. These cookies cannot track your browsing activity on other websites.

Of course, if you do not wish to have cookies on your devices, you may turn them off at any time by modifying your internet browser's settings. However, by disabling cookies on your device, you may be prohibited from full use of the Website's features or lose access to some functionality.

- (b) Google Analytics. The Website sends aggregated non-Personal Information to Google Analytics for the purpose of providing us with the ability to conduct technical and statistical analysis on the Website's performance. For more information on how Google Analytics supports the Website and uses information sent from the Website, please review Google's privacy policy available at <https://policies.google.com/technologies/partner-sites>.
- (c) Web Beacons. A Web Beacon is an electronic image. Web Beacons can track certain things from your computer and can report activity back to a web server allowing us to understand some of your behavior. If you choose to receive emails from us, we may use Web Beacons to track your reaction to our emails. We may also use them to track if you click on the links and at what time and date you do so. Some of the third-party marketers we engage with may use Web Beacons to track your interaction with online advertising banners on our Website. This information is only collected in aggregate form and will not be linked to your Personal Information. Please note that any image file on a webpage can act as a Web Beacon.
- (d) Embedded Web Links. Links provided in our emails and, in some cases, on third-party websites may include tracking technology embedded in the link. The tracking is accomplished through a redirection system. The redirection system allows us to understand how the link is being used by email recipients. Some of these links will enable us to identify that you have personally clicked on the link and this may be attached to the Personal Information that we hold about you. This data is used to improve our service to you and to help us understand the performance of our marketing campaigns.
- (e) Third-party Websites and Services. We work with a number of service providers of marketing communications technology. These service providers may use various data collection methods to improve the performance of the marketing campaigns we are contracting them to provide. The information collected can be gathered on our Website and also on the websites where our marketing communications are appearing. For example, we may collect data where our banner advertisements are displayed on third-party websites.

## 5. HOW WE USE YOUR INFORMATION

The information we gather and that you provide is collected to provide you information and the services you request, in addition to various other purposes, including, but not limited to:

- providing you with a personalized experience when you use the Website;
- developing new products and services;
- contacting you with other information related to your membership that we believe will be of interest to you (in accordance with any privacy preferences you have expressed to us);
- contacting you with information and notices related to your use of the Website;
- inviting you to participate in surveys and providing feedback to us (in accordance with any privacy preferences you have expressed to us);
- better understanding your needs and interests;
- improving the content, functionality and usability of the Website;
- improving our products and services;
- improving our marketing and promotional efforts; and
- any other purpose identified at the point of data collection, in an applicable privacy notice, in a click-through agreement or in any other agreement between you and us.

Duration. The length of time Company intends to retain Personal Information, including sensitive personal information, if any, is for as long as reasonably necessary to carry out Company's intended business purpose for such information.

## 6. HOW WE DISCLOSE YOUR INFORMATION

We do not sell or lease your Personal Information to any third party. We may disclose your Personal Information to a third party for a business purpose, including the following categories of third parties:

- *Our Affiliates.* We may disclose the information collected through the Website with our Affiliates in order to provide our products, services and effective customer support.
- *Third-party Service Providers.* We disclose Personal Information collected through the Website with third-party Service Providers who act for or on behalf of the Company. These third parties may need information about you to perform their functions. "Service Providers" may include suppliers, dealers, distributors, companies and consultants that provide website hosting, software development, payment processing, website and data analytics, order fulfillment, information technology and related infrastructure support, customer service, email delivery, and auditing.
- *In Aggregate or De-Identified Form.* We may aggregate or otherwise anonymize the data we collect for purposes of analytics, research, marketing and other business interests of the Company. Such use shall not include Personal Information or information that can identify you as an individual or reasonably be used to identify you.

Except as described in this Policy, we will not share your information with third parties without your notice and consent, unless it is under one of the following circumstances:

- *Legal Reasons.*

- We believe that disclosure is reasonably necessary to comply with any applicable law, regulation, subpoena, or court order;
  - To respond to duly authorized information requests from law enforcement or other governmental authorities;
  - To enforce our agreements or policies;
  - To investigate and prevent security threats, fraud, or other malicious activity; or
  - To respond to an emergency that we believe in good faith requires us to disclose such information to assist in preventing the death or serious bodily injury of any person or Company employee.
- *Sale of Business or Merger.* There are circumstances where the Company may decide to buy, sell, or reorganize its business. Under these circumstances, it may be necessary to disclose or receive Personal Information with prospective or actual purchasers, acquisition targets, partners or affiliates. In such circumstances, the Company will ensure your information is used in accordance with this Policy.

## **7. YOUR CHOICES AND SELECTING YOUR PRIVACY PREFERENCES**

We want to provide you with relevant information that you have requested. When possible, we will always provide options as to what information we collect and how you can manage any preferences that pertains to such information.

If we provide subscription-based services, such as email newsletters, we will allow you to make choices about what information you provide at the point of information collection or at any time after you have received a communication from us while you are subscribed. Transactional or service-oriented messages, such as delivery confirmation messages, are usually excluded from such preferences, as such messages are required to respond to your requests or to provide goods and services, and are not intended for the purposes of marketing.

From time to time, we or our third-party service providers may send you email newsletters and marketing emails. You may opt out of them at any time by selecting the “unsubscribe” link at the bottom of each email. Please note that by opting out or unsubscribing you may affect other services you have requested we provide to you, in which email communication is a requirement of the service provided. Even if you opt-out of receiving marketing material, we or our third-party service providers may still need to contact you with important information about your account or responding to your requests or questions.

## **8. ACCURACY AND ACCESS TO YOUR PERSONAL INFORMATION**

We strive to maintain and process your information accurately. We have processes in place to maintain all of our information in accordance with relevant data governance frameworks and legal requirements. We employ technologies designed to help us maintain information accuracy on input and processing.

Where we can provide you access to your Personal Information in our possession, we will always ask you for a username and password to help protect your privacy and security. We recommend

that you keep your password safe, that you change it periodically, and that you do not disclose it to any other person or allow any other person to use it.

To view and change the Personal Information that you have provided to us, you can log in to your account and follow the instructions on that webpage, or contact us directly for assistance.

## **9. INFORMATION OF MINORS**

We do not knowingly collect or use information from individuals under the age of eighteen (18) without parental or guardian consent. We encourage parents and guardians to provide adequate protection measures to prevent minors from providing information unwillingly on the internet. If we are aware of any Personal Information that we have collected about minors under the age of eighteen (18) without parental or guardian consent, we will take steps to securely remove it from our systems. To the extent a registered user is providing demographic information about an individual under the age of eighteen (18), such registered user shall be responsible for obtaining the necessary parental or guardian consents to collect this information.

## **10. THIRD-PARTY WEBSITES**

This Policy does not apply to websites or other domains that are maintained or operated by third parties or our affiliates. Our Website may link to third-party websites and services. For example, if you click on an advertisement on the Website, you may be taken to another website that we do not control. These links are not endorsements of these websites, and this Policy does not extend to them. Because this Policy is not enforced on these third-party websites, we encourage you to read any posted privacy policy of the third-party website before using the service or website and providing any information.

## **11. YOUR STATE RIGHTS**

If you are a consumer in a state that provides consumer rights, please be advised that Project SEARCH is not a “business” or “controller” as that term is defined under applicable state laws and therefore does not afford consumers these rights with respect to their Personal Information. Regardless, all Personal Information will be processed in accordance with this Policy.

## **12. LOCATION OF OUR WEBSITE AND SERVICES**

We do not warrant or represent that this Policy or the Website’s use of your Personal Information complies with the laws of every jurisdiction. Furthermore, to provide you with our services, we may store, process, and transmit information in the United States and other locations around the world, including countries that may not have the same privacy and security laws as yours. Regardless of the country in which such information is stored, we will process your Personal Information in accordance with this Policy.

## **13. FOR WEBSITE USERS OUTSIDE THE UNITED STATES**

Under the (i) General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, or “GDPR”), (ii) Data Protection Act 2018, (iii) the GDPR as it forms part of the law of England and Wales, Scotland and Northern Ireland (i.e., “UK GDPR”) as provided in the Data Protection Act 2018, and (iv) any other applicable data

protection legislation of any country or other jurisdiction (collectively “International Data Protection Laws”) individuals have specific rights with respect to their Personal Information, or “personal data” as defined under the International Data Protection Laws. For the purposes of this Policy, the Company operates as a data controller. Any personal data we collect from you is processed in the United States and under the terms of this Policy.

Any personal data we collect from you is processed in the legitimate interest of our business and providing our services to you as the lawful means of such processing. You may always withdraw your consent to our use of your personal data as described below. We will only retain your personal data for the time necessary to provide you the information and services to which you have consented, to comply with the law and in accordance with your rights below.

The Data Controller is:

NAME: Cincinnati Children’s Hospital Medical Center

ADDRESS: 3333 Burnet Ave.  
Cincinnati, OH 45229-3039

EMAIL ADDRESS: [projectsearch@cchmc.org](mailto:projectsearch@cchmc.org)

You can exercise any of the following rights, subject to verification of your identity, by notifying us as described below:

- Access. You may request a copy of the personal data our Website databases currently contain.
- Automated Processing and Decision-Making. You may request that we stop using your personal data for automated processing, such as profiling. When contacting Company, please explain how you wish us to restrict automated processing of your personal data. When such restrictions are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data.
- Correction or Rectification. You can correct what personal data our Website database currently contains by accessing your account directly, or by emailing us (as provided below) to request that we correct or rectify any personal data that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause information to be incorrect. Where applicable, we will ensure such changes are shared with trusted third parties.
- Restrict Processing. When applicable, you may restrict the processing of your personal data by submitting a request via email (to the email provided below). In your email, please explain how you wish us to restrict processing of your personal data. When such restrictions are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data. Where applicable, we will ensure such changes are shared



with trusted third parties.

- *Object to Processing.* When applicable, you have the right to object to the processing of your personal data by submitting a request via email to (to the email provided below). When such objections are not possible, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent to the processing of your personal data. Where applicable, we will ensure such changes are shared with trusted third parties.
- *Portability.* Upon request and when possible, we can provide you with copies of your personal data. When such a request cannot be honored, we will advise you accordingly. You can then choose to exercise any other rights under this Policy, to include withdrawing your consent. Where applicable, we will ensure such changes are shared with any trusted third parties.
- *Withdraw Consent.* At any time, you may withdraw your consent to our processing of your personal data through this Website by notifying us via email (to the email provided below). Using the same email address associated with your Website account, simply type the words “WITHDRAW CONSENT” in the subject line of your email. Upon receipt of such a withdrawal of consent, we will confirm receipt and proceed to stop processing your personal data. Where applicable, we will ensure such changes are shared with trusted third parties.
- *Erasure.* If you should wish to cease use of our Website and have your personal data deleted from our Website, then you may submit a request by emailing us at the email provided below. Upon receipt of such a request for erasure, we will confirm receipt and will confirm once your personal data has been deleted. Where applicable, we will ensure such changes are shared with trusted third parties.

Exercising your rights. If you are a data subject that has rights under the International Data Protection Laws, who chooses to exercise the rights listed above, you can submit a request via email at [projectsearch@cchmc.org](mailto:projectsearch@cchmc.org)

Submit Complaints or Questions. If you wish to raise a complaint on how we have handled your personal data, you can contact us as described below. If you reside in a European Union member state or the United Kingdom, you may also lodge a complaint with the supervisory authority in your country.

#### **14. SAFEGUARDING THE INFORMATION WE COLLECT**

We use reasonable technical, administrative, and physical safeguards in order to protect your Personal Information against accidental loss and from unauthorized access, use, alteration, and disclosure. However, we can never promise 100% security. You have a responsibility, as well, to safeguard your information through the proper use and security of any online credentials used to access your Personal Information, such as a username and password. If you believe your credentials have been compromised, please change your password. Please also notify us immediately of any actual or suspected unauthorized use of the Website or your information.

## **15. CHANGES TO THIS POLICY**

This Policy describes our current policies and practices with regard to the information we collect through the Website. We are continually improving and adding to the features and functionality of the Website along with the products and services we offer through the Website. If we make any changes to this Policy, a revised Policy will be posted on this webpage and the date of the change will be reported in the “Last Revised” block above. You can get to this page from any of our webpages by clicking on the “Privacy Policy” link (usually at the bottom of the screen).

## **16. HOW TO CONTACT US**

We value your opinions and welcome your feedback. To contact us about this Policy or your Personal Information, please contact us by email at [projectsearch@cchmc.org](mailto:projectsearch@cchmc.org), by mail at 3333 Burnet Ave., Cincinnati, OH 45229-3039 or by phone at 513-636-4200 or 1-800-344-2462.