City of Hope Research Surveys Privacy Policy

Last Updated: November 30, 2018

This Privacy Policy outlines how City of Hope ("we", "us", or "our") may collect, use, process, maintain and discloses information collected from you ("you", "your", "user") when you download and/or interact with our mobile application services, “City of Hope Research Surveys” ("App", or “Services”). The purpose of the App is to allow users to easily sign up for, and participate in, City of Hope clinical research studies and surveys. Please read this Privacy Policy carefully before downloading and using the App.

This Privacy Policy tells you what information we collect, how we protect it, your relationship with our Services, and what choices you have regarding your information. This Privacy Policy is a part of, and is governed by, our Terms of Use. It is important that you carefully read both this Privacy Policy and our Terms of Use. By accessing or using our Services, and voluntarily providing us with your Personal Information, you are consenting to our use and disclosure of your Personal Information in accordance with the terms of this Privacy Policy.

If any of your data is considered Protected Health Information ("PHI"), we will treat it confidentially in accordance with the Health Insurance Portability and Accountability Act of 1996 and its implementing regulations ("HIPAA"), and in accordance with our Notice of Privacy Practices.

Definitions

- As used in this Privacy Policy, “Personal Information” means any information that may be used, either alone or reasonably in combination with other information, to personally identify the specific individual user to whom such information pertains.
- “Health Information” is a subset of Personal Information, and means any information of a person related to health or medical status, including, by way of example, but not limitation, names of doctors, health conditions, medicines, and/or prescription information and history, paired with Personal Information.
- “Registered Users” include individuals who have signed up to use certain password protected portion of our Services.
- “Providers” include clinical researchers, physicians, physician’s assistants, therapists, nurse practitioners, and pharmacists who use our Services to provide care to you.

Personal Information Collected

1.1. Account Registration. At the time you request an invitation code to become a Registered User of the Services, you may be asked to provide us Personal Information including your email address so we can create an account for you to participate in clinical trial surveys for those clinical studies in which you are enrolled. Your provision of any Personal Information is voluntary. However, if you choose not to provide the information requested, certain aspects or elements of the Services may not be available to you.
1.2. **Contact Us.** If you send us customer support emails to riapps@coh.org, or if you utilize the chat function of the App, we may maintain those communications and their contents so that we can resolve your inquiries or otherwise assist you. Personal Information collected to communicate with you are used to contact you to respond to your inquiries, and are not used to add you to our newsletter or another unsolicited marketing message (unless you also otherwise provide us with your Personal Information for those purposes).

1.3. **Data Collected by the App.** We may collect Personal Information and Health Information including the age, gender, weight, health conditions, self-reported or calculated symptoms, state of measurement, and any other information you provide us via the App.

2. **Information Collected Automatically**

While you are using the App on your mobile device, we may collect information from that device, including your IP address, browser type, and device type, and other usage information about your device. When you are using the App, we may collect the app version, device hardware model, device operating system (OS) version, language and region settings, and measurement mode.

In order to personalize and enhance your experience with our Services, we may also collect information through the following technologies:

- **Log Files.** The information inside the log files includes internet protocol (“IP”) addresses, type of browser, Internet Service Provider (“ISP”), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us.

- **Third Party Services.** Our App uses third party services like Google Analytics and Google Firebase to help us understand how visitors interact with our App, and to help us improve our Services. To view Google’s Privacy Policy, please click [here](#). To opt out of Google Analytics, please download and install the “Google Analytics Opt-out Browser Add-on” by clicking [here](#).

3. **How We Use Your Personal Information and Health Information**

We will not use or disclose your Personal Information or Health Information in a manner inconsistent with applicable law or this Privacy Policy. Examples of our uses and disclosures include:

- We may use your Personal Information and Health Information to provide you with our Services;
- We may use your Personal Information to establish you as a Registered User for our Services;
- We may use your Personal Information to verify your identity to allow your access to any password protected portions of the Services;
• We may use your Personal Information to respond to your questions and comments that you communicate to us or to respond to your request;
• We may use your Personal Information to respond to your customer service requests and support needs;
• We may use your Personal Information to provide, analyze, administer and improve our Services;
• We may use your Personal Information to perform business analytics or for other similar purposes to improve the quality of our business, our Services and similar services we offer;
• We may use your Personal Information and Health Information to create aggregated, non-personal information, or to create de-identified information (“Anonymous Data”); and
• We may use your Personal Information and Health Information to investigate possible violations of and enforce our contracts, including terms of use and any terms and conditions associated with our products, and to comply with our legal obligations.
• We may use your Personal Information and Health Information for clinical research purposes and in connection with the clinical study in which you are enrolled.

4. Data Security

Access to Personal Information and Health Information is limited to authorized employees, or our hired contractors that (i) need to know that information in order to process it on our behalf or to provide you with Services, or (ii) that have agreed not to disclose it to others. We follow generally accepted industry standards to safeguard your information, however, no data or email transmission is ever fully secure or error free. Therefore, please take special care in deciding what information to send us. We have reasonable safeguards in place to protect your information, and we have taken the following security measures:

• Transport Layer Security (TLS) - We use TLS encryption when transmitting certain kinds of information through the App from your mobile device to our server. An icon resembling a padlock is displayed in most browsers during TLS sessions. When you send text messages or emails to your friends, family or other individuals in your contact list, those messages or emails are outside of our control and are not encrypted. Alerts and reminders sent to your mobile device are also not encrypted.

• Secure Storage - We deploy reasonable and appropriate industry standard physical, technical, and administrative safeguards to protect your Personal Information.

• Vendors and Partners - To protect the security and privacy of your information, we may provide information to partners and vendors who work on our behalf or with us and require them to agree to maintain the confidentiality of your information.
• **Access to Information** - We limit access to Personal Information to those employees who reasonably need access to such information in order to provide you with services and process your information appropriately.

5. **Data Retention**

We will retain your Personal Information for the length of time needed to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law. We may retain de-identified data for an indefinite amount of time for research and development purposes.

6. **How We Disclose Personal Information and Anonymous Data**

We may share Personal Information with service providers and governmental agencies or as otherwise described below:

• **Providers and Unaffiliated Third Parties.** We may share your Personal Information and Health Information with Providers in order for them to provide services and products you requested.

• **Service Providers.** We may share your Personal Information with affiliated and unaffiliated companies that perform tasks on our behalf related to our business. Such tasks include managing and analyzing this Site or mobile application usage data, customer service, trouble shooting by accessing users’ systems remotely (with users’ consents), electronic and postal mail service, contests/surveys/sweepstakes administration, marketing services, social commerce and media services (e.g., Facebook, ratings, reviews, blog), and payment processing services. Third-party service providers receive your Personal Information as necessary to perform their role, and we instruct them not to use your Personal Information for any other purposes.

• **Professional Advisors.** We may share your Personal Information with our auditors, lawyers or other professional advisors so they can support our business. Like the other service providers, these professional advisors are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them.

• **As Required by Law.** We will disclose your Personal Information as necessary or appropriate, including to providing information as required by law, regulation, subpoena, court order, legal process or government request; to enforce our Terms of Use, including investigations of potential violations thereof; to detect, prevent or otherwise address fraud, security or technical issues; when we believe in good faith that disclosure is necessary to protect your safety or the safety of others; to protect our rights, to investigate fraud, or to respond to a government request.
7. **How We Disclose Anonymous Data**

The Anonymous Data you provide allows us to perform analysis, research and generate the appropriate statistics relevant to you. We may share this Anonymous Data with other research affiliates, agents, and business partners, to better understand our users as well as to improve the content and functionality of the App and the Site. Collecting this information also allows us to perform technical research and development, improve the App and the Site, and develop new features or services.

We may conduct research on our end User’s demographics, interests, and behavior based on the Anonymous Data. This research may be compiled and analyzed on an aggregated basis. We may share with its affiliates, agents, and business partners this “aggregated” data, compiled from the information that it collects from users. These aggregate data do not identify you personally. We may also disclose aggregated data in order to describe our services to current and prospective business partners, and to other third parties for other lawful purposes. Although these aggregated data do not identify users personally, there is a risk that third parties who receive such data from us may re-identify specific users. Prior to sharing any Anonymous Data with third parties, we will secure in writing the express written agreement of such third parties that they will not attempt to re-identify the information to any particular individual.

8. **Children**

We do not knowingly collect Personal Data from children under the age of 13 and do not target the Site or the App to children under 18. If you are under 18, you should not attempt to use the Services or provide any data to us. If you have reason to believe that a child under the age of 13 has provided Personal Data to us, please contact us (riapps@coh.org), and we will endeavor to delete that information from our databases.

9. **Your Choices**

We strive to maintain the accuracy of any Personal Information and Health Information that may be collected from you, and will use our commercially reasonable efforts to respond promptly to update our database when you tell us any such information in our database is not accurate. It is your responsibility to ensure that such information is accurate, complete and up-to-date. You may obtain from us, by email or mail, the information in our records and/or files. If you wish to make any changes to any Personal Information you have provided to us, you may do so at any time by contacting us at riapps@coh.org. You may opt out of receiving communications from us and our affiliates by emailing us at riapps@coh.org. If you close your Registered User account, we will no longer use your online account information or share it with third parties. We may, however, retain a copy of the information for archival purposes, and to avoid identity theft or fraud.

We do not currently recognize automated browser signals regarding tracking mechanisms, which may include “do not track” instructions. However, we do not collect Personal Data from visitors to our Site.
10. Updates to This Privacy Policy

We may periodically update this Privacy Policy to describe new Services features, products or services we offer and how it may affect our use of information about you. If we make material changes to this Privacy Policy, we will post a notice on the Services prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices. We will not make any materially different use or new disclosure of your Personal Information to another entity using your Personal Information for that entity’s own purposes unless we notify you and give you an opportunity to object.

11. Questions regarding this Privacy Policy

If you still have any questions about anything in our Privacy Policy, just contact us. We can be reached at: riapps@coh.org