MRCT Center Privacy Notice and Terms of Use

Overview
Your privacy is important to us. This Privacy Statement explains how the Multi-Regional Clinical Trials Center of Brigham and Women’s Hospital and Harvard (“MRCT Center” or “we”) will collect, use, and share information about those who use our platform, access our newsletter, or receive communications from us. By visiting our website, you consent to the practices and terms of this Privacy Statement.

This Privacy Statement applies to www.MRCTcenter.org and our websites and digital platforms that link to or expressly adopt or refer to this Privacy Statement (our “Online Platforms”).

If you are a resident of the European Economic Area (EEA), click here for our EEA Privacy Disclosures.

Personal Data We Collect

“Personal Data” means any information that can be used to identify you, directly or indirectly, as an individual person. We collect Personal Data about you when you use our Online Platforms, including data provided by you, data we automatically collect, and data we obtain from third parties.

MRCT Center collects Personal Data to operate effectively and to provide you the best experience with our platform. You provide some of these data directly, such as when you register for an MRCT Center event, log in to our sponsor platform, or contact us for support. We obtain some information by recording how you interact with our platform by, for example, using technologies such as cookies and receiving error reports or usage data when you use the platform.

Data Provided By You
We collect Personal Data that you enter on our websites or give to us in another way. For example:

➢ When you access our Online Platforms, we may collect
  o contact information, such as your name, email address, mailing address, and telephone number
  o employment-related information, such as employer, department, job title and business contact information
  o account information, such as account name, password, security question responses, and a unique identification number
  o product interest information, including products and areas of interest
➢ When you request, obtain, or purchase a product or service from us, we collect
  o contact information, such as your name, email address, mailing address, and telephone number
  o purchase information, including payment card information, order details, government identification number, automated order entries and other transaction information
  o employment-related information, such as employer, department, job title and business contact information
➢ When you complete an event registration, we collect, depending on the event:
  o your contact information, email address, employer, job title, education, dietary restrictions.
  o purchase information, including payment card information, order details, government identification number, automated order entries and other transaction information
  o employment-related information, such as employer, department, job title and business contact information
  o curriculum vitae or resume
  o letters of recommendation
➢ When you fill out a survey, we collect, depending on the event:
  o satisfaction with an event or course, product usage, and product satisfaction
  o other information in response to solicited questions, as you voluntarily contribute
➢ When you contribute information to our websites, we collect:
  ➢ user generated content, such as content you post on our blogs or other Online Platforms, or content you post on social media platforms
    o any information you contribute spontaneously or in response to questions
➢ When you contact us on the phone, through email, text, we may collect
  o the inquiries or reports you make
  o the timbre of your voice and any comments you make

Data We Automatically Collect
We use technologies to collect data automatically when you use our Online Platforms that do not directly reveal your identity. Examples of these technologies include the following:

Logging: Like most websites, we gather certain information automatically and store it in log files. This information includes IP addresses, browser type, operating system, internet service provider, the pages visited, operating system, clickstream data and time and date of visit.

Cookies, Analytics and Other Data Collection Tools: We and third parties we work with use cookies, web beacons, local shared objects (or Flash cookies), and similar tools to collect and store data about your preferences and how you interact with our websites and mobile
applications. For more information, including on how to control your privacy settings, read our Cookie Policy.

Data We Obtain from Third Party Sources
We collect information about individuals from a number of third party sources.

Business Partners and Service Providers: Our business partners and service providers, such as contacts database and website hosting providers, collect Personal Data and share some or all of this information with us.

Single Sign-On: When we allow you to register and login to our Online Platforms through a third-party platform, we collect data from the third-party platform permitted under the settings and privacy policy of that platform.

Publicly Available Sources: We collect Personal Data about you that we do not otherwise have (including contact information, employment-related information and product interest information) from social media platforms (for example, LinkedIn), and other publicly available databases.

How We Use Personal Data
MRCT Center uses the data we collect to operate our non-profit organization and platform. This includes using data to improve the performance of our platform and personalize your experiences. We also may use the data to communicate with you, for example, informing you about our account, events, products and other items, help you with queries; initiate security updates; and update you on any actions we need you to take on the platform.

For example, we use Personal Data that we collect to:

➢ Process and complete your transactions including, as applicable, enrollment to our Newsletter or in our programs or events
➢ Carry out our contractual obligations to you
➢ Communicate with you about programs, products, or services we believe may be of interest to you
➢ Tailor our products and services to you and your computer or mobile device
➢ Allow you to participate in interactive features of our Online Platforms, when you choose to do so
➢ Prevent, investigate, or provide notice of fraud, or unlawful or criminal activity, or as otherwise required by law
➢ Enforce our Terms of Use and other agreements

How We Share and Disclose Personal Data
We share Personal Data in the following ways.
Within MRCT Center: We share Personal Data within MRCT Center for purposes and uses that are consistent with this Privacy Statement. For example, sharing Personal Data about you to process and fulfill your event participation, facilitate communication between you and a local MRCT Center representative, and coordinate necessary data retention.

Service Providers: We share Personal Data with third party service providers who complete transactions or perform services on our behalf, such as, payment processing, coordinating events and conferences, and facilitating seminars and training courses.

Website and Database Hosting Provider: We use Media Temple to host our website. In connection with providing those services, Media Temple has access to Personal Data about you collected through the website and may use the information consistent with the terms of their Privacy Policy. We use Constant Contact® to host our contacts database and events registration. In connection with providing those services, Constant Contact® has access to Personal Data about you collected through events registration, newsletters, MRCT Center’s distribution lists and may use the information consistent with the terms of their Privacy Statement.

Legal Process, Safety and Terms Enforcement: Information and actions that you take on the platform are fully auditable, including communication channels on the platform that we may deploy in the future. We may disclose Personal Data to governmental regulatory authorities in response to their requests for such information or to assist in investigations. We may also disclose Personal Data to third parties in connection with claims, disputes or litigation, when otherwise required by law, or if we determine its disclosure is necessary to protect the health and safety of you or us, to protect against fraud or credit risk, or to enforce our legal rights or contractual commitments that you have made.

Children’s Privacy
Our Online Platforms are not directed to, and we do not intend to, or knowingly, collect or solicit Personal Data online from children under the age of 18. If you are under the age of 18, do not provide us with any Personal Data either directly, on any website bulletin boards, or by other means. If a child under 18 has provided Personal Data to us, we encourage the child’s parent or guardian to contact us to request that we remove the information from our systems.

How to Access & Control Your Personal Data
You can choose whether you wish to receive MRCT Center newsletters and may unsubscribe at any time. At the bottom of every MRCT Center newsletter there is an “unsubscribe” button that will automatically connect you to a website that solicits and effectuates your choices.
Country/Region-Specific Disclosures
The laws of certain countries and regions require specific information to be included in a Privacy Statement. Please click below to review country/region-specific information applicable to you.

- If you are a resident of the European Economic Area, click here.

Links To Other Websites
Some of our Online Platforms may contain links to websites and digital services operated by third parties. This Privacy Statement does not apply to these websites. We recommend that you read the appropriate website or digital services’ Privacy Statement to become familiar with its terms, some or all of which may differ from the ones reflected here.

Our Online Platforms also include features like buttons and widgets hosted by other companies (for example, the LinkedIn button). Some of these features collect Personal Data or other information such as IP address and your actions on our Online Platforms. This Privacy Statement does not apply to the practices of these third parties. We encourage you to review the privacy policies of those third parties to learn about their personal data and privacy practices.

Notice to End Users
We may update our Privacy Statement and we will inform our users and members about this change via email and on the platform, in advance to any implementation of the changes.

Managing Communication Preferences
If you have opted in or are subscribed to our newsletters, communications, and/or events (or where permitted by law, if you have provided us or we have obtained your contact information), we may send you email messages, or other communications regarding events, resources, products, or services. At any time, you may elect to discontinue receiving messages from us by submitting an opt-out request to the contact information or by following the unsubscribe instructions in the form of the communication you received, as described below.

Emails: To opt out of receiving communications via email, please send an unsubscribe request to the email address set forth in the Contact Us section below or click on the unsubscribe link at the bottom of each email received; please follow the directions on the web page to which the link connects. Please note that you may continue to receive certain transactional electronic messages from us.
Contact Us

If you have any questions or comments about this Privacy Statement or other privacy-related matters, please contact us in the following ways:

MRCT Center
14 Story Street, 4th floor
Cambridge, MA 02138

mrct@bwh.harvard.edu
617-496-9807

MRCT CENTER COOKIE POLICY

Cookies & Similar Technologies
MRCT Center and our affiliates (collectively, “MRCT Center” or “we”) uses cookies (small text files placed on your device) and similar technologies to provide our websites and online services and to help collect data. Cookies allow us, among other things, to store your preferences and settings; enable you to sign-in; combat fraud; and analyze how our platform is performing.

We also use web beacons to help deliver cookies and gather usage and performance data.

These small data files or graphic files serve various functions:

- **Strictly Necessary:** Necessary to deliver our services (for example, essential cookies);
- **Performance and Functionality:** Enhance the performance and functionality of our services but are non-essential to their use (for example, performance and functionality cookies);
- **Analytics and Customization:** Allow us to understand the effectiveness of our services, as well as to customize our services based on this information (for example, customization cookies and analytical web beacons); and

How can you control cookies and similar technologies?

**Browser Controls:** Most web browsers allow some control of most cookies through the browser settings. For more information about how to reject, disable or delete cookies, please review your browser’s help menu or visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org). If you choose to reject cookies, you may not be able to take advantage of certain features, services,
applications or tools available through the Services that are only available through the use of these technologies.

You can control the use of certain cookies and related technologies by:

- Opting out of targeted online advertising through advertising networks (please visit http://www.aboutads.info/choices/, http://optout.networkadvertising.org/?c=1#!/ or http://www.youronlinechoices.com for more information);
- Setting or amending your web browser controls to accept or refuse cookies (please visit your browser’s help menu for more information).

If you choose to reject certain cookies, you may still use our websites and online services, though your access to some functionality and features may be restricted. If you have any questions regarding our use of cookies and other related technologies, please contact us at mrct@bwh.harvard.edu.