

Privacy Policy

Last Modified: September 7, 2023

This Privacy Statement applies to your use of the Cleveland VA Medical Research and Education Foundation (CVAMREF) Cle VA mobile apps (the “Sites”) as well as associated CVAMREF Services (the “Services”).

If You participate(d) in a study or trial, please see the privacy statements in Your specific study or trial for more information or contact Your study sponsor or investigator for assistance.

Please note that some CVAMREF Applications are subject to their own specific Privacy Statements, which are linked either in the Application or the applicable app store.

This Privacy Statement is designed to inform you of the information we gather as part of your use of the Sites and Services where CVAMREF is the data controller. If you have any questions or concerns regarding this Statement, or wish to exercise an access, data portability, or deletion right, please see the section “Exercising Access, Data Portability, and Deletion Rights” below for more information.

By accessing or using the Sites or Services, you acknowledge your acceptance of the practices described in this Privacy Statement and consent to our processing of your information as set forth in this Privacy Statement.

1.0 Changes to this Privacy Statement

CVAMREF (“CVAMREF” or “We”) may modify this Privacy Statement from time to time. The date of any revisions will be displayed at the top of this Privacy Statement.

2.0 CVAMREF’s platform, customized applications, and services

Please note that CVAMREF supplies its Customers with Applications and Services, particularly for purposes of clinical trials and healthcare research. When you use CVAMREF Services as part of your engagement with a CVAMREF Customer, you will be subject to a Privacy Statement issued by that CVAMREF Customer. In such instances, CVAMREF acts as a data processor, working on behalf of that CVAMREF Customer (the data controller).

3.0 Types of information CVAMREF collects

As part of your use of the Sites and Services, We may collect:

- Non-Personal Data regarding your use of the Sites and Services - for example your “click-path” or how you navigate our Sites or Services, the duration of time you spend on a given webpage, how often you visit or use the Sites or Services, information about your browser or device from which you access the Sites and Services, pseudonymous IDs including information linked to DIIs (Device-Identified Information) such as Cookies, MAID (Mobile Advertising IDs), Statistical IDs, IP Addresses and other third-party identifiers which do not, by themselves, identify a specific individual);

- Log and event data related to the performance of the Sites and Services

4.0 How CVAMREF uses personal information

Personal Data which we collect via the Sites and Services for a particular purpose will only be retained and used for that purpose, unless you have agreed to allow us to use it for additional purposes as described in this Privacy Statement.

Generally, we will use Personal Data and other information we collect from you to:

- Provide you with technical support, customer service, and account maintenance;
- Fulfill the reason for which you provided us information;
- Tailor your experience using the Sites and Services;
- Improve our Sites and Services, including for testing, research, and product development purposes;
- Protect the security of your account and our business;
- Prevent or detect fraud or abuses of our Sites and Services;
- Comply with applicable law;
- Provide, operate, and maintain the Sites and Services;
- Authenticate and verify user identities;

4.1 CVAMREF surveys

Online surveys provide CVAMREF information about users' experiences with our products and services. We occasionally invite users to take optional surveys in studies we host for our customers to learn more about their experience with CVAMREF's studies. CVAMREF does not ask users to provide any sensitive personally identifiable information, such as passwords, social security numbers, driver's license, and medical records.

5.0 How CVAMREF shares personal information with others

. We may also disclose any of your Personal Data to law enforcement or other appropriate third parties in connection with criminal investigations, investigation of fraud, infringement of intellectual property rights, or other suspected illegal activities, or as otherwise may be required by applicable law, or, as we deem necessary in our sole discretion, in order to protect the legitimate legal and business interests of Company.

To the extent we collect any aggregated anonymous information, we may share that information and information derived from the aggregated anonymous information with our business partners.

6.0 How CVAMREF secures personal information.

CVAMREF implements physical, administrative, and technical safeguards designed to protect your personal information from accidental or unlawful destruction, loss, alteration, and unauthorized disclosure or access. We contractually require that our suppliers implement similar measures designed to protect personal information from accidental or unlawful destruction, loss, alteration, and unauthorized disclosure or

access. No online service can ever be 100% secure, and as a result we do not guarantee the security of any personal information you provide.

8.0 Use of cookies and automated tracking on the CVAMREF.com website to collect personal information

The CVAMREF Sites, and some services and advertisements on the Sites, may contain “cookies.” A cookie is a piece of data that is sent to your browser, which will store the cookie on your computer if your browser is enabled to accept cookies.

Most internet browsers will allow you to erase cookies from your computer hard drive, block acceptance of cookies, or receive a warning before a cookie is stored.

You should refer to your browser instructions or “Help” screen to learn more about how to manage cookies. Please note, however, that if you block cookies, some portions of the Site and services may not function properly.

CVAMREF does not control cookies in third-party ads, and visitors are encouraged to check the privacy policies of advertisers and/or ad services to learn about their use of cookies and other technology. Ads appearing on our Sites may be delivered to you by third-party advertising companies. These companies may use information about your visits to this and other web sites in order to provide advertisements on this site and other sites about goods and services that may be of interest to you.

We do collect general, aggregated, demographic, and non-Personal Data using cookies and automated means (this includes technical information about your session with our website, such as your browser version and IP address, as well as information about your use of our website, such as how you navigate it and how long you spend viewing it). We will not seek to identify you through cookies or other means without your consent. This type of anonymous, aggregated profiling and session data may also include information that you have provided to us through surveys, polls, etc., but will not be tied to any Personal Data, without your consent.

You can manage your preferences in relation to Cookies and Automated Tracking on the sites by clicking on the shield icon on the bottom left of this webpage.

9.0 Children’s personal information

The Sites and Services are not intended for anyone under the age of eighteen.

CVAMREF does not knowingly collect information from children under the age of eighteen unless we have obtained consent from a parent or guardian, or such collection is subject to a separate agreement with us which specifically provides for us to obtain such information.

10.0 Do not track

The Website does not support Do Not Track at this time. Do Not Track (DNT) is a privacy preference that you can set in your web browser to indicate that you do not want certain information about your webpage visits collected across websites when you have not interacted with that service on the page. For all the details, including how to turn on Do Not Track, visit donottrack.us.

11.1 CVAMREF does not sell consumer data for monetary or other valuable consideration.

13.0 Exercising personal data access, portability, and deletion rights.

CVAMREF's Headquarters

CVAMREF Privacy Team

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For all privacy and HIPAA-related questions please contact:

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