## **PRIVACY POLICY / TERMS OF USE**

This Privacy Policy is effective as of May 25, 2018.

## What is "personal information?"

"Personally Identifiable Information" (or "PII") refers to contact information that directly or indirectly tells specifically who you are, such as your name, phone number, company name, job, email, postal address, or any other information that could be linked to you with reasonable effort. We do not collect sensitive information such as location information (GPS), racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic or biometric data, data concerning health or data concerning sexual orientation.

#### When We Act as Controller

We will be acting as the "Controller" of the personal data you provide directly to us via a "Subscribe" or "Register for an Event" form, when creating an account, or via other contact methods. You are not required to provide your personal information for purposes of navigating through the public areas of our website.

If you have provided your personal data to an TTC Regional, International, or National Center (TTCs) who has entered into an understanding with us to provide use of our services, we will be acting as the "Processor" of your personal data transmitted to us by them. As processor, we do not own, control, or direct the use of any data provided to us by other TTCs, which act as "Controllers".

### **How We Collect and Use Your Data**

We collect PII directly from you when you complete a "Subscribe" or "Register for an Event" form, and when you request that we send you emails or resources. Before collecting your PII, you will have the option to give or withhold your consent for our sending you emails including our use of your PII for marketing emails to promote our products or products similar to our products or services. You may withdraw your consent at any time by unsubscribing to our emails by using an opt-out link contained in every email.

We may make full use of your Usage Data (for example email bounces or clicks on hyperlinks in emails) for purposes such as to customize email communications and to analyze the performance of those emails, as well as your interaction with them.

Subject to your right to opt-out, we may combine Usage Data with PII that we collect, and use the combined data for purposes of improving our products and services and your user experience with our products and services.

# **How Long We Keep Your Data**

We will not retain your PII or Usage Data for longer than required. This means that we will keep your PII or Usage Data for any or a combination of time periods described as follows: (i) until we no longer have a valid reason for keeping it, (ii) until you request us to stop using it, or (iii) up to 10 years.

### **Information Sharing and Disclosure**

We will not share or sell your PII with any outside parties.

We may provide your PII and Usage Data to any affiliated TTC Regional, National or International Centers, the Substance Abuse and Mental Health Services Administration (SAMHSA), or the Presidents Emergency Plan for AIDS Relief (PEPFAR).

Except for sharing your information as described above, we will not disclose information about you or the contents of your communications unless compelled to do so in the good-faith belief that such action is reasonably necessary (a) to comply with the law; (b) to comply with legal process; (c) to enforce these terms and conditions; or (d) to respond to claims that any content violates the rights of third parties.

#### **WEBSITE TERMS OF USE**

## **Cookies and Opt-Out Procedures**

We may automatically collect Usage Data through the use of "cookies." Cookies are small text files a website uses to recognize repeat users, facilitate the user's ongoing access to the site, and facilitate the use of the site. "Cookies" also allow a site to track usage behavior and compile site-usage information that will allow for the improvement of content.

# **Analytics**

We may participate with third party analytics partners to monitor and analyze Web traffic and to keep track of user behavior on this site.

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google utilizes the data collected to track and examine the use of this site, to prepare reports on its activities, and to share them with other Google services.

Information collected: cookie and Usage Data. Visit Privacy Policy at <a href="https://www.google.com/intl/en/policies">https://www.google.com/intl/en/policies</a>. You may opt-out of the Google Analytics service with the Google's Browser Add-on that's available at <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a>.

You may opt-out of Google's use of cookies by visiting the <u>Ads Preferences Manager</u>. Also, you can opt out of other third-party use of cookies by visiting the <u>Network Advertising Initiative opt-out page</u>.

## **Links to Other Websites**

This site may contain links to other websites. We have no responsibility or liability for the policies and practices of these sites. You should be careful to review any privacy policies posted on any of these sites before providing information to them.

## **Contact Us**

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