



WEBSITE PRIVACY POLICY

Effective Date of this Website Privacy Policy: May 26, 2023.

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1. **Introduction.** Welcome to the PACE Partners of Northeast Florida, Inc. (“**PACE Partners**”) website. The following describes how we handle information we may learn about you from your visit to our website. PACE Partners has created this website as a readily accessible compilation of public information about the organization. To assist you in using our website, and to explain the relationship arising from your use of our website and the information offered through it, we have created: (i) this privacy policy (the “**Privacy Policy**” or “**Policy**”); and (ii) a set of terms and conditions of use (the “**Terms of Use**” or “**Terms**”). PACE Partners is committed to maintaining the privacy of information that may be shared during use of this website and online interaction with our organization. This Privacy Policy provides information on how the organization collects, uses, and treats information that we may learn about you through use of the website and does not apply to information that PACE Partners may obtain through other means, such as traditional mailing lists or phone conversations.

2. **Your Consent.** **Please read this Privacy Policy with care before using this website. By accessing and using this website, you are acknowledging that you have read and understand this Privacy Policy and agree and consent to be legally bound by it. If you do not agree with and consent to the terms of the Privacy Policy, please do not use this website.**

3. Information We Collect. Information you may provide in visiting our website falls into two broad categories: personally identifiable information and aggregate information. “Personally Identifiable Information” is information that can be used to identify or contact you, such as your name, email address, or mailing address. “Aggregate Information” is information that does not identify you, and may include, for example, statistical information concerning the Web pages on our website used most frequently. Our Privacy Policy governs both categories of information. Personally Identifiable Information is gathered on this website for internal reporting and evaluation purposes only. We also collect information that you choose to provide to us, including email addresses, which may be used to communicate on a regular basis with healthcare providers, consumers, and job applicants. Nonspecific aggregate information is also gathered only to evaluate Internet traffic related to the website. This may include page views, time and length of viewings and sites that refer visitors to this website. When you use this website, certain anonymous information can also be collected, such as: (i) the name of the domain and host from which you access the Internet; (ii) the IP address of the computer you are using; (iii) the browser and operating system you are using; (iv) the date and time you access the website; and (v) the Internet address of the website from which you linked to this website. We may use a small text file that PACE Partners’ system sends to your computer to collect information about your activities on this website called “Cookies” to automatically gather some of this information. Most browsers are initially set up to accept Cookies. You can reset your browser to refuse all Cookies or indicate when a Cookie is being sent. Please consult the help section of your Web browser software to learn how to do this.

4. How We Use Your Information. We use information you provide to us via the website only as provided in this Policy. PACE Partners may use the information that you provide, and the organization collects to:

(i) **Communicate with you.** If you send us an email with questions or comments, or if you include your contact information when providing us with feedback about our website, we may use your email address and other Personally Identifiable Information included in your correspondence to respond to you, or as otherwise set out in our Terms.

(ii) **Information you wish to have posted on our website or in our newsletters.** Among other information, our website contains testimonials and other information about PACE Partners and our services. You may submit testimonials for posting on our website or inclusion in our newsletters via the “contact” tab. We will use the Personally Identifiable Information you provide to contact you about your proposed posting (as we deem advisable), and for related purposes.

(iii) **Registering for events; payment.** You may register for certain events by downloading a registration request (each, a “Registration Request” or “Request”) available on our website and sending the completed Request to PACE Partners via the instructions included on the Request. The Registration Request asks you provide certain Personally Identifiable Information including, among other things: (i) your name; (ii) your contact information;

(iii) information related to your professional practice; and (iv) your billing information. We use this information to facilitate your registration and for other, related purposes. In addition, we use the billing information you provide to process the payment for the applicable event (the “Event Fee”). We also retain a copy of your Registration Request for our records unless you fail to attend the course or cancel your registration, in which case we destroy the Request. We handle payments by submitting billing information that you provide to a third-party vendor. Any billing information sent by us to our third-party vendor is intended solely to allow said third party to process payment. If we have trouble processing a payment, we may also use the Personally Identifiable Information you provide to contact you.

(iv) **Newsletters and other updates to you.** In addition, you may provide us with your email address and other Personally Identifiable Information so that we can send you newsletters concerning PACE Partners, our website, the services we offer, and other information related to PACE Partners (the “Newsletters”). In addition, we may use your email address and other Personally Identifiable Information to invite you to presentations, or other events that we believe may be of interest to you. You will have the ability to opt out of receiving these materials, as provided below.

(v) **Marketing.** We may use third parties that we refer to as service providers to facilitate or outsource one or more aspects of our business, product and/or service operations that we provide to you (e.g., technology, job boards, forums, newsletters/alerts, analytical tools, advertising campaign management). We may provide some of your personal information directly to these internal service providers. These service providers may be subject to confidentiality agreements or other legal restrictions that prohibit their use of the information we provide them for any other purpose except to facilitate the specific outsourced related operation unless you have explicitly agreed or given your prior permission to them for additional uses. In some instances, the service provider may collect information directly from you. In these cases, you will be notified of the involvement of the service provider, and all additional information you provide that provider, and their additional uses will be strictly at your discretion. If you provide additional information to a service provider directly, then their use of your Personally Identifiable Information is governed by their applicable privacy policy. Some information, such as the IP address and your email address, may be shared with the third parties who help us run our website and email programs. They will only use this information to serve our needs and are prohibited from using it in any other instance.

(vi) **Additional Information.** Periodically, we may send other news, bulletins, or information to you that is not included in our newsletters and will use Personally Identifiable Information to send you such communications. If we choose to undertake these communications, you will have the ability to opt out of receiving them as provided in below.

(vii) **Surveys.** Periodically, we may initiate surveys on our website, and we may request Personally Identifiable Information from you in connection with such surveys. You are free to choose whether or not to participate in a survey. Survey information may be used for

purposes of monitoring or improving the use and appeal of our website, and for other purposes set out in the survey. We will notify you of relevant details in connection with asking for your participation in such surveys.

(viii) **No unrelated third party is given access to your personal information.** Except as expressly stated in this Policy, we do not share with unrelated third parties any Personally Identifiable Information that you provide to us. We will share your Personally Identifiable Information with vendors that are involved in providing the services that we offer or the operation and maintenance of our website (collectively, the “Site Vendors”). Personally Identifiable Information that we collect will be disclosed only to PACE Partners employees or Site Vendors on a “need-to-know” basis for purposes of fulfilling their responsibilities.

(ix) **Other uses.** Other uses may include to: administer the website and diagnose server issues; verify your identity; measure the number of visitors to the website and how the website is used in order to make the website as useful as possible; and enable cookies, click-throughs, tags and other similar technology used with the website.

To opt out of receiving Newsletters, bulletins or other communications from us please notify the webmaster at the email address provided on the last page of this Privacy Policy.

5. Publicity. For purposes of publicizing by posting publicly on our website or in our newsletters, or for other purposes compatible with our website, you may choose to provide to us, your experiences with the services we offer, or related success stories or testimonials. We will treat any Personally Identifiable Information that you include with testimonials as intended to be publicly posted on our website and in our newsletters as you request, and in our sole discretion. Please keep in mind that Personally Identifiable Information posted in this manner is not subject to the provisions of this Privacy Policy that otherwise govern our handling of Personally Identifiable Information and will be publicly available to our website visitors if we elect to post your testimonial. If you wish to have Personally Identifiable Information concerning an individual other than yourself posted on our website, please be sure that you have permission from that individual to submit the information for posting. Please review our Terms for more information on how we treat information you wish to have posted on our website or included in our newsletters (referred to as “Submitted Content”).

6. Other Websites. Our website and our newsletters may contain links to other websites. Please be aware that we are not responsible for the privacy practices or content of other websites. We encourage you to be aware when you leave our website and to read the privacy policies of each website that collects Personally Identifiable Information. This Privacy Policy applies solely to information collected by our website and does not, for example, apply to information collected by a website operated by a third party.

7. How to Obtain Access to and Update Your Information. To allow you appropriate control over your Personally Identifiable Information, you can request that we change, update



or delete the Personally Identifiable Information that you have previously submitted to us. We will take reasonable steps to verify your identity before fulfilling such requests. In addition, you have the option to unsubscribe to our newsletters, and we will take reasonable steps to comply with this request in a timely manner. You may also delete your name and other Personally Identifiable Information from our databases. Please understand, however, that it may be impossible to remove this information completely, due to system backups and records of deletions. In addition, if you request deletion of your Personally Identifiable Information, you will be unable to utilize the services associated with that Personally Identifiable Information. We will fulfill deletion requests within a reasonable time.

8. How We Protect Your Information. To enable us to better understand the characteristics of our visitors and/or to provide services tailored to your needs or otherwise improve our website, we may link (i) the Personally Identifiable Information you have provided us with (ii) Aggregate Information. If we combine or link Aggregate Information or other information with your Personally Identifiable Information, the resulting combination will be treated and protected as Personally Identifiable Information under this Privacy Policy. Accordingly, no unrelated third parties will be given access to this information by us.

We have put in place security systems designed to prevent unauthorized access to or disclosure of Personally Identifiable Information you may provide to us, and we take reasonable steps to secure and safeguard this Personally Identifiable Information. Moreover, employees of PACE Partners are required to acknowledge that they understand and will abide by our policies with respect to the confidentiality of Personally Identifiable Information. Our security systems are therefore designed to deter and prevent hackers and others from accessing Personally Identifiable Information that you provide to us. We also use software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage. Please understand, though, that this section should not be viewed as giving business, legal, or other advice, or warranting as fail-proof, the security of any information, including Personally Identifiable Information, submitted to our website. Due to the nature of internet communications and evolving technologies, we cannot provide, and expressly disclaim, assurance that the information, including Personally Identifiable Information, you provide us will remain free from loss, misuse, or alteration by third parties who, despite our efforts, obtain unauthorized access.

9. Exceptions to Our Privacy Policy. There are two exceptions to our Privacy Policy. First, we may release or use Personally Identifiable Information in connection with: (i) legal proceedings, or contemplated legal proceedings, that directly relate to such information; or (ii) in response to a subpoena or court order specifically requesting such information. Second, in cases involving threat of imminent harm to you or others, we may release Personally Identifiable Information to prevent or mitigate the threat. In any such case, we will seek to limit the scope of the disclosure and restrict such disclosure only to appropriate authorities and will disclose only such Personally Identifiable Information as is reasonably required to fulfill the

purpose of the disclosure. In addition, unless instructed otherwise by a court or other authority with appropriate jurisdiction, we may undertake reasonable efforts: (a) to notify you of such disclosure or request for disclosure; and (b) to provide you with this notice as far in advance of the disclosure as is reasonably practicable. Persons who receive information in proper accordance with the procedures set out in this section (“Proper Recipients”) may be able to combine (i) information they properly obtain from us under this section, with (ii) other information they independently possess concerning you. As long as we comply with the procedures set out in this section concerning the release of information, we will not be responsible for Proper Recipients’ later use of this information.

10. Confidentiality and Security. Patient referrals can be made electronically via this website, information provided is encrypted and stored in a secured database. PACE Partners has taken and will continue to take measures to protect the confidentiality and security of information transmitted to this website; however, please be aware that the Internet is inherently insecure, and confidentiality and security of information cannot be guaranteed. Please read PACE Partners’ Notice of Privacy Practices to understand how any Protected Health Information (“PHI”), as that term is defined in the Health Insurance Portability and Accountability Act of 1996, at 45 CFR § 160.103, will be treated.

In addition, you may use this website to apply for employment with PACE Partners. Information that you provide during use of this website to apply for employment with PACE Partners is also encrypted and stored in a secured database. While PACE Partners makes every attempt to maintain safeguards to prevent unauthorized access to information collected, PACE Partners does not represent or warrant that the use of PACE Partners’ online employment application will not suffer a security breach.

11. Children. This website is not directed at children under the age of 13. PACE Partners complies with Children’s Online Privacy Protection Act (“COPPA”) and does not knowingly permit registration or submission of personally identifiable information by anyone under 13 years of age. In the event we discover that a child under the age of 13 has provided Personally Identifiable Information to us, in accordance with COPPA, we will delete the child’s Personally Identifiable Information from our web databases or obtain verifiable parental consent.

12. Changes to Our Privacy Policy. PACE Partners may, from time to time, change the contents of the Privacy Policy, which will be effective immediately upon posting. The effective date of this Privacy Policy is shown at the top of page 1 and the version history is shown below.

<u>Effective Date</u>	<u>Description</u>	<u>Document Owner & Reviewers</u>
May 26, 2023	Privacy Policy	Bonnie Overbey & Brandon Masters

13. Complete Agreement and Relationship to Terms and Conditions of Website Use. This Privacy Policy should be read in conjunction with PACE Partners’ Terms and Conditions of Website Use. The provisions of PACE Partners’ Terms and Conditions of Website Use are



incorporated herein by this reference. To the extent that the Terms and Conditions of Website Use may conflict with the terms of this Privacy Policy, the terms of this Privacy Policy will control.

14. Choice of Law and Venue. This Policy shall be construed in accordance with the laws of the state of Florida, without regard to any conflict of law provisions. Any dispute arising under this Privacy Policy shall be resolved exclusively by the state or federal courts sitting in the judicial district that includes Jacksonville, Florida.

15. Transfer of Website. We shall be entitled to transfer Personally Identifiable Information to a third party in connection with a sale of all or substantially all of the assets of the business entity responsible for the Personally Identifiable Information under this Policy, provided the acquiring third party has agreed to safeguard your Personally Identifiable Information with protections that in all material respects are the same as, or more protective than, those set out in this Privacy Policy.

16. Website Administration. If you have any questions about this Privacy Policy, the Terms and Conditions of Website Use, or the administration of this website, you may contact PACE Partners at: webmaster@thepaceplace.org.