



## **Privacy Practice**

### Patient Care Therapy Group's Commitment to Privacy

Your privacy is important to us. The PCTG Privacy Policy has been developed to demonstrate our firm commitment to your privacy and to explain how the Patient Care Therapy Group collects, uses, shares, and safeguards Personal Data and Non-Personal Data on our website and on any other websites and mobile applications PCTG may launch in the future, as well as microsites, social media sites, and any other digital platform or service operated or used by PCTG from time to time (Sites). PCTG recognizes its responsibility to treat with care and protect the information and data it collects, and to respect your data privacy.

Your use of the Sites and participation in PCTG programs and services signifies that you understand this Privacy Policy and that you acknowledge the collection, use, and storage of and your rights as described herein.

This Privacy Policy is subject to change.

### **Data Collection**

PCTG collects data online, by phone, or by paper that allows PCTG to identify or contact you (Personal Data) to carry out its business purposes. We collect this information at various points of service, including, but not limited to, when you register for a PCTG event or program, complete a contract form or survey, sign up for a newsletter, volunteer, or otherwise interact with PCTG.

The types of Personal Data PCTG collects includes, but is not limited to, the following:

- General data (e.g., names, dates of birth, home and business addresses, email addresses, internet protocol addresses and mobile, landline, business, and/or personal telephone numbers that are provided by our members or other customers).
- Site usage (e.g., browsing history, search terms, member login activity, and email clicks).
- Products and services viewed, including advertisements for such products and services.
- Professional data (e.g., school information, and licensure information).
- Government-issued identification numbers (e.g., social security numbers, national identification numbers, and tax identification numbers), for example from employees and independent contractors.
- Other identification information (e.g., photographs and audio during podcasts, lectures, public performances).
- Financial information (e.g., credit and debit card numbers, credit reports, passwords, PINs) for product sales or employment purposes.
- Sensitive Personal Data (e.g., racial or ethnic origin, political opinions, trade union membership, health data) for diversity or accessibility purposes, employment purposes, surveys, Education Leadership Institute, PTCAS, RF-PTCAS, Physical Therapy Outcomes Registry, educational programs and services, membership, and professional aggregation.

PCTG also receives Personal Data from third parties for PCTG's use in marketing and providing products and services.

PCTG collects information (whether online, by phone, or by paper) that does not directly identify you (Non-Personal Data). The types of Non-Personal Data we collect includes, but is not limited to:

- Computer, operating system, and platform type.
- Internet service provider.
- Your industry and business (e.g., company size and location, job functions, seniority levels).

### **How PCTG Uses Your Data**

The following explains how PCTG uses your Personal Data and Non-Personal Data.

#### **Personal Data**

PCTG uses Personal Data to carry out its business purposes, which include but are not limited to, membership transactions, product and service transactions, conference registrations, directories, targeting products, services, and messages based on your interests, or to otherwise interact with PCTG. More specifically, PCTG uses Personal Data, sometimes in combination with Non-Personal Data, in a variety of ways, including, but not limited to:

- Carry out obligations arising from or related to membership, or any other contract entered into between you and PCTG.
- Account set up and administration.
- Provide service communications such as bill reminders, order confirmations, program registrations, and customer service messages.
- Provide products, information, and services.
- Respond to your emails or online requests for products, services, or information.
- Identify you when you visit our Sites.
- Research and development purposes.
- Carry out polls and surveys.
- Provide you, or permit selected third parties to provide you, with information about events, products, or services.
- Personalize and improve the usability of PCTG's Sites, products, and services.
- Personalize content, advertising, marketing, programs, and services to you.
- Meet internal audit requirements.
- Legal obligations.
- Publish membership directories, membership lists, and registration lists on the Sites, in print, and in digital media to allow the public to find you.
- Ensure that content is presented most effectively for you and your computer.

#### **Non-Personal Data**

PCTG uses Non-Personal Data to improve the usability of the Sites and for other business reasons. We or third-party companies also use the Non-Personal Data to target advertisements to you.

Please note that when you select an advertising link or other link that takes you to sites not operated by PCTG, you may be subject to the privacy policies of these third-party sites.

## **Cookies**

Cookies are small files used to send information from our Sites to your web browser. The Sites use session cookies, which are destroyed when a user closes the Internet browser, and permanent cookies, which remain on the user's hard drive until manually deleted by clearing the cache. Cookies are used for many purposes, including allowing users to access member-protected content without logging in before loading each page. Permanent cookies allow users to utilize the "remember me" feature to avoid having to log in again to the Sites after closing the previous internet browser session. You can control cookie settings in your internet browser to automatically reject some forms of cookies. If you view the Sites without changing your cookie settings, you are indicating your consent to receive all cookies from PCTG's Sites. If you do not allow cookies, some features and functionality of PCTG's Sites may not operate as expected.

## **Third-Party Data Sharing**

We share your Personal Data, sometimes combined with Non-Personal Data, in a variety of ways including, but not limited to:

- Share data with third parties to fulfill service requests and to perform business functions (e.g., PCTG contracts with third parties to provide services on our behalf such as data hosting services; packaging, mailing, and delivery services; customer support and consulting services; event registration services).
- Share data with partners, including chapters and sections.
- Share data with third parties as required by law or to protect PCTG in the good-faith belief that such action is necessary to: (1) Conform to legal requirements or comply with legal process served on PCTG. (2) Protect and defend PCTG's rights or property. (3) Protect the personal safety of PCTG personnel or members of the public in appropriate circumstances.
- Share data with third parties to offer you products and services that may be of interest to you professionally or personally (e.g., business software solutions, member product discounts). Users can request that their information be removed from such lists (opt out of receiving emails) by using the information provided under "Your Rights Regarding Your Data" below.
- Share data with third parties for research purposes that align with PCTG's goals and priorities.
- Share data with third parties under other unanticipated situations, but only with your consent.

Your email address will be used only by PCTG, its entities, components, and vendors performing member services or offering products on PCTG's behalf or as a member benefit. Understand that your email address may be visible through membership directories, membership lists, and registration lists. PCTG shares your email address with third parties to enable PCTG to take security measures to help protect against unauthorized access to or unauthorized alteration, disclosure, or destruction of data. PCTG shares email addresses with third parties as necessary for PCTG to perform certain services on our behalf, such

as packaging, mailing, and delivering products, processing event registrations, and responding to your service requests.

PCTG reserves the right to use or disclose data where we reasonably believe it is needed to (i) respond to information requests by law enforcement or other governmental authorities; (ii) comply with any law, regulation, subpoena or other legal process, or court order; (iii) investigate and help prevent security threats, fraud activity, or inappropriate, unauthorized, or illegal activity involving PCTG's services or networks; or (iv) enforce or protect APTA's rights and property. In such circumstances, data may be disclosed without notice to the individual.

## **Security**

Your privacy is of the utmost importance to us, but due to legal and security matters that are beyond our control, we cannot guarantee that the data that you may provide to us, including personally identifiable information, is not disclosed to a third party. PCTG incorporates reasonable safeguards to protect the security, integrity, completeness, accuracy, and privacy of the data we collect. In our efforts to make the Sites secure, we use the latest industry standards to safeguard the confidentiality of your personally identifiable information, such as firewalls and Secure Socket Layers, where appropriate. PCTG also takes precautions to protect information from loss, misuse, and alteration. Only PCTG employees who need access to your data in order to do their job are allowed access. Pursuant to PCI compliance requirements, PCTG employs procedures to safeguard any credit card data we collect from you when making an order. Please note, however, that no method of electronic transmission or storage is 100% secure. Therefore, we cannot guarantee its absolute security.

## **Public Access**

The Sites contain discussion forums, message boards, and other public or member-based forums. Any data that you provide in these forums may become public and/or available to all members, and you must exercise caution when deciding to provide any data, including personal information. Although we try to protect personally identifiable information, PCTG cannot guarantee the privacy of any data that you provide on these forums; accordingly, any information you provide is at your own risk. PCTG is not responsible for maintaining the privacy or secrecy of any passwords or account information that you may have disclosed.

## **Your Rights Regarding Your Data**

To protect your privacy and security, we will take reasonable steps to verify your identity. You can manage your profile and email preferences, including "opting out" of emails, by contacting PCTG via the information under "How to Contact PCTG" below and/or managing your member profile. Our processing of your data is based upon your consent, contract performance (e.g., your purchase of products or membership sign-up/renewal), legitimate business interest (e.g., direct marketing of goods and services), or compliance with law.

## **Other Important Information**

### **Location of Data**

PCTG is headquartered in the United States, in Edison, New Jersey, and our services are hosted in and managed in the United States. If you are a user located outside the U.S., you understand and acknowledge to having your data (which may include information collected through the use of cookies and other technologies, as described above) transferred, processed, and stored in the U.S. or in any other country in which we engage service providers or to which you direct us to transfer your data.

Your data is processed in the U.S., where privacy laws may be less stringent than the laws in your country. By submitting your data to PCTG, you agree to the transfer, storage, and processing of your data in the U.S.

### **Data Retention**

In general, PCTG retains data for the period necessary to fulfill its business purposes, unless a longer period is required, needed for archival and research purposes, or permitted by law.

### **Third-Party Sites**

The Sites may include links to other websites that are not owned or controlled by PCTG, and PCTG is not responsible for the contents of any linked site, the conduct of any linked site, or any changes or updates to such sites.

PCTG may provide links to you only as a convenience, and the inclusion of any link does not imply an endorsement by PCTG of the website. You should read the privacy policy of the third-party provider to see how your data will be treated on its site.

### **How to Contact PCTG**

If you have any questions, comments, requests, or concerns related to this Privacy Policy, please contact our program director of PCTG at [andadle@pctherapygroup.com](mailto:andadle@pctherapygroup.com) or at:

Bedrock Management Services Organization

Attention: VP of Operations

26 N. Main St

Edison, NJ 08837

Phone: 609-385-2622; Fax: 856-520-8239