



## **Privacy Policy**

This Privacy Policy describes the practices of the Hospital Council of Northwest Ohio, its subsidiaries, and affiliates (referred to as a group as "HCNO") regarding past and ongoing collection and use of information from visitors to our website and users of our other Internet services. By visiting the HCNO website including but not limited to [www.hcno.org](http://www.hcno.org), and [www.healthlucascounty.org](http://www.healthlucascounty.org), you are accepting the practices described in this Privacy Policy.

### **Information We Collect and How We Use It**

HCNO collects information from several sources. Our Web server automatically collects the domain name and Internet Protocol ("IP") address for each visitor to our websites.

We collect information about the usage of our websites. In addition, we may request or require you to provide personally identifiable information and/or create an account to access certain services or engage in certain activities on a website. The information collected depends on how you choose to use our services and our website, as detailed below.

#### **a. Commonly Accepted Practices**

Information collected may be used for commonly accepted practices, including:

1. Product service fulfillment, such as the use of addresses.
2. Sending electronic materials and/or publications to online subscribers.
3. Administration of our websites and monitoring usage of our websites.
4. Internal operations, such as the use of identify-verification technologies, and the review of server logs.
5. Legal compliance and public purposes, such as subpoena and third-party audit compliance.
6. Registration and participation in HCNO programs, services, and communities; and
7. Marketing of services to you by HCNO.

#### **b. Information Collected to Create an Account**

There are times when HCNO may request or require you to create an account with us to access restricted areas of our websites. In such cases we may collect username or ID and password information from you. We use this information to verify users' identities to prevent unauthorized access to users' personal information. As part of registering for some of HCNO's services and resources, we may collect contact and demographic information such as your name, address, email address, etc. Certain information may be required to complete the registration process.

#### **c. Cookies**

Several portions of the HCNO websites use cookies. Cookies are small data files that are transferred to your computer through your Web browser. Cookies are used by most websites. We may use cookies, clear gifs, and log file information to: (a) store information so that you will not have to re-enter it during subsequent visits; (ii) provide personalized content; (iii) monitor effectiveness of marketing campaigns.

(iv) record site analytics such as total number of visitors, pages viewed, etc.; and (v) track your entries, submissions and communications. Certain features of our website require cookies to function properly.

Most browsers are initially set up to accept cookies, but you can reset your browser to refuse all cookies or to indicate when a cookie is being sent. Some HCNO website features and services may not function properly if you set your browser to refuse cookies.

#### **d. Email Addresses and Mailing Lists**

HCNO collects and uses the email addresses and mailing addresses of its members (*see Section 2. Members' Information, below*) for the purpose of providing membership benefits and services to members. In addition, HCNO collects email and mailing addresses in connection with registration for and attendance at conferences, webinars and other events, participation in HCNO programs, and in other circumstances. We may use your e-mail address or other personally identifiable information to send marketing messages to you regarding HCNO's activities. In addition, we may also use your name, mailing address, e-mail address, or other personally identifiable information to send public relations or marketing messages on behalf of our affiliated organizations. You may opt-out of any or all disclosures as provided below.

#### **e. Surveys**

Participation in any HCNO online survey is strictly voluntary. Our online surveys may ask respondents for contact, demographic and other personally identifiable information. The ways in which such information may be used or disclosed will be described in the survey materials. We also may use contact information from our surveys to send the user information about programs and services of HCNO and our affiliated organizations.

#### **f. Information from Other Sources**

The information we collect is gathered from several sources. Such sources may include but are not limited to: membership enrollment; conference, webinar, distance learning and other event registration; website visits; and newsletter subscriptions. We may combine the information you submit when using one of our services with information (a) collected from your use of other HCNO services, (b) collected by HCNO affiliated organizations, or (c) obtained from third parties. The combined information may be used in a similar manner to any other information we collect.

### **2. Members' Information**

The HCNO and its affiliated organizations offer institutions the opportunity to become members of the HCNO and its affiliates. As part of membership enrollment, we may require or ask you for personal or organizational information. We will create a member profile for you using such information and other information collected as described in this Privacy Policy. We may share the information in the member profile created with respect to membership in one HCNO organization with other HCNO affiliated organizations and third-party service providers. The information you submit as part of your membership may also be used to compile a member directory or a list of persons registered to attend an event (either hardcopy or electronic). Such directories and lists may be shared with other members within a group, other registrants or third parties for marketing their products and services.

### **3. Third Party Advertisers and Links**

This Privacy Policy applies to the HCNO websites only. HCNO's website and publications may contain many links to other websites. In addition, HCNO and its affiliates may maintain a presence on third-party sites such as Twitter®, Facebook® or Linked-In®. These other websites may send their own cookies to users, collect data or solicit personal information. HCNO is not responsible for the privacy practices or the content of these other websites. Please check with the other sites to review their privacy policies and how they may collect or use information.

HCNO websites may contain functionality which enables you to import profile information or contacts from third party services (e.g., LinkedIn, Facebook, Twitter, Gmail, etc.) (collectively, "Third Party Social Media Accounts"). If you choose to do this, you may have to log into the applicable third-party account, using such account's user name and password. The copy of the information received by us shall be subject to this Privacy Policy. However, any data maintained by in Third Party Social Media Accounts and by such third-party service and your use of that third-party service will be subject to that third party's terms of use and privacy policy.

### **4. Information Sharing**

In addition to the information sharing described elsewhere in this Privacy Policy, the HCNO shares personal information with OHA affiliated organizations and other trusted businesses or persons to perform functions on our behalf. These third parties have access to personal information needed to perform their functions, but may not use it for other purposes.

In the unlikely event that HCNO or one of its affiliated organizations is acquired, or substantially all of the assets of HCNO or one of its affiliated organizations are acquired, by a third party either in a sale, bankruptcy court proceeding or otherwise it is possible that personal information of website users and customers would be one of the assets transferred. In such an event, HCNO would take reasonable steps to require the third party to maintain our privacy policies and practices.

In addition, HCNO may disclose personally identifiable information to third parties, but only:

- (a) to contractors we use to support our business, provided they only use the personally identifiable information for HCNO purposes;
- (b) to respond to law enforcement requests, where required by applicable laws, court orders, warrants, subpoenas (whether civil or criminal) or governmental regulations;
- (c) in situations involving threats to the physical safety of any person;
- (d) in connection with joint ventures with third parties; or
- (e) as necessary to enforce our rights in connection with the Web Site.

### **5. Information Security**

Please understand that no one can give an absolute assurance that information intended to be maintained as private, whether transmitted via the Internet or otherwise, cannot be accessed inappropriately or unlawfully by third parties. It is important for you to protect against unauthorized access to your password and to your computer. Be sure to sign off when finished using a computer. We have taken and will continue to take reasonable steps to ensure the secure and safe transmission of your personal information.

## **6. Children's Privacy**

The HCNO website is not intended for children under eighteen (18) years of age. HCNO does not knowingly solicit or collect personal information from or about any such children, and HCNO does not knowingly market its products or services to any such children. If HCNO becomes aware that it has inadvertently received personal information from a User under the age of eighteen (18), it will delete such personal information from its records.

## **7. Changes to Our Privacy Policy**

HCNO MAY MODIFY THIS PRIVACY POLICY AT ANY TIME, AND ANY CHANGE WILL BE EFFECTIVE IMMEDIATELY UPON POSTING OF THE MODIFIED PRIVACY POLICY. YOU AGREE TO REVIEW THE PRIVACY POLICY PERIODICALLY TO BE AWARE OF SUCH MODIFICATIONS AND YOUR CONTINUED ACCESS OR USE OF THE SITE SHALL BE DEEMED YOUR CONCLUSIVE ACCEPTANCE OF THE PRIVACY POLICY, AS MODIFIED.

IF FOR ANY REASON HCNO WOULD LIKE TO USE THE INFORMATION YOU HAVE SUBMITTED FOR SUBSTANTIALLY DIFFERENT PURPOSES OTHER THAN THOSE OUTLINED AT THE TIME YOU ORIGINALLY SUBMITTED YOUR INFORMATION, HCNO WILL AFFIRMATIVELY REQUEST PERMISSION FROM YOU TO USE SUCH DATA FOR THOSE SUBSTANTIALLY DIFFERENT PURPOSES PRIOR TO USING THE DATA.

## **8. Accessing and Updating Personal Information**

You may request access to your personal information, corrections and/or deletions of the same by using the Contact Information set forth below. We will use reasonable, good faith efforts to promptly address your concerns, subject to legal retention obligations and legitimate business needs.

When making a request, individual users are asked to identify themselves and the information requested to be accessed, corrected or removed. We may decline to process requests that are unreasonably repetitive or systematic, require disproportionate technical effort, jeopardize the privacy of others, would be extremely impractical, or for which access is not otherwise required. Correcting or removing data is done free of charge to the user unless doing so requires a disproportionate effort. After deleting your information from active servers, copies may remain in our backup system.

## **9. Contact Information and Opt-Out Requests**

We welcome your comments, suggestions, and questions about our Privacy Policy and privacy practices. If you feel that HCNO is not following this Privacy Policy, please contact our offices by calling 419-842-0800. If you wish to make corrections to or have your personal information deleted, please call 419-842-0800 and ask for Human Resources.