



**AIRA**  
AMERICAN IMMUNIZATION  
REGISTRY ASSOCIATION

# Privacy Policy

*Last updated on May 25, 2018.*

The American Immunization Registry Association (AIRA) takes your privacy seriously; we want you to understand how we use information about you. We've set this Privacy Policy up to communicate about data collection and usage with users of AIRA's digital platforms — which include, e.g., the AIRA website, membership database, and any other and any embeddable content that we may make available for display on outside websites or digital platforms (collectively, the "AIRA Platform").

Please note that the AIRA Platform often includes links to third-party sites or services ([see Appendix 1](#)), such as sites or services owned or controlled by the Centers for Disease Control and Prevention, academic journal and member sites. This Privacy Policy does not cover any third-party sites or services, or your use of them; we suggest that you review those sites' policies to learn more about their privacy practices.

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

### **We Collect Some Information Directly**

On certain occasions when you interact with the AIRA Platform – e.g., by joining as a member, signing up for a newsletter, joining a committee or other workgroup – you may submit information of your own accord, or be asked to do so to participate in certain activities. Some examples of information that you submit and we collect may include:

- Name and login information
- Email address
- Mailing address
- Phone number
- Organization name
- Responses to surveys
- Photos
- Comments on content under development
- Information about membership and sponsorship payments

In this Privacy Policy, we will refer to this type of personally identifiable information as "Personal Information."



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AIRA and the AIRA Platform are based in the United States. If you voluntarily submit Personal Information to us while located or residing in a country outside the United States, you understand that you are voluntarily agreeing to the use and processing of such information as provided in this Privacy Policy, including transfer of your information to the United States, a jurisdiction which may not offer the same framework for the protection of personal information as the jurisdiction in which you are located.

### **We Collect Some Information Automatically**

Cookies are used across the internet for many purposes, from tracking activity to being a fundamental part of how a website works.

When you use the AIRA Platform, third-party vendors may automatically recognize information like your IP address, what type of device you're using, high-level location information (e.g., city or state), and your user behavior (such as how long you stay on the website and which links you click on).

Some of the [third-party vendors](#) that we use to provide services for the AIRA Platform (e.g. analytics) may also use their own tracking technologies on our digital properties to help us run and optimize our platforms. These third parties may collect information about your online activities over time and across the AIRA Platform and other online properties. As a user it is your responsibility to familiarize yourself with the policies of third-party vendors. Links to third-party vendor privacy policies are included in [Appendix 1](#).

### **Opting Out of Tracking**

If you wish to disable cookies and other use-tracking technologies, your browser settings may enable you to do so. Please be aware, though, that disabling cookies may change or reduce the functionality of the AIRA Platform in certain contexts. Users who wish to opt out of Google Analytics data collection may use Google's own [browser add-on](#) to do so.

### **How We Process, Store and Use Personal Information**

We only collect Personal Information as discussed above – and use the Personal Information we receive within or through the AIRA Platform and family of services for purposes disclosed in this Privacy Policy or in connection with your submission of information.

In general, our main purpose in collection, use, and storage of information is to further our mission by making the AIRA Platform work better for you and by staying in touch with you about AIRA events or offerings that may interest you. So, for example, we may email to invite you to join a new newsletter list, ask for your input on documents under development, invite you to educational webinars and meetings, or ask you to renew your membership when it expires. Our usage of your Personal Information is necessary for our



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legitimate interest in and purpose of staying in touch with you and administering and promoting the AIRA Platform.

If you do not wish to be contacted, you can indicate your preference when you submit your contact information –AIRA website users with accounts can opt out using the My Profile feature. Everyone else can use the opt-out links provided at the bottom of our emails and newsletters, or contact us at [info@immregistries.org](mailto:info@immregistries.org). We will make your requested change in a timely manner.

Please note that if you share Personal Information through certain AIRA Platform publishing features, it may become public (e.g. if you include your email address in a comment or your name in a content submission, that information may be seen by other users or used for attribution).

### **Aggregated and De-Identified Information**

We may use information that has been aggregated and anonymized or de-identified to assess and improve the AIRA Platform, including to enhance your user experience, to select third-party vendors who best meet our needs, and to help funders better understand our audience. We may sometimes produce data and analysis results with this aggregated or anonymized information that help us understand our users and their interactions with the AIRA Platform. To accomplish this we may share aggregated or anonymized information with third parties – and may also share the resulting data and analysis (which will not include any Personal Information).

### **Information Security and Storage**

GDPR requires a host of security measures to ensure data is safe. The AIRA Platform already provides a robust security infrastructure and we voluntarily work with third-party consultants to stay on top of it. As part of compliance with GDPR, we are reviewing and strengthening our security controls even more.

### **We May Share Information in Limited Circumstances**

#### **For Mailing Lists**

It is AIRA policy not to sell or exchange email addresses or phone numbers with any other company or organization. If we ever do want to share this information with someone else (e.g., if we collect your email for a sponsored event and want to share with our sponsor), we will ask for your permission.

#### **With Vendors**

As noted above, we may engage [outside companies](#) to help us develop, operate, and improve the AIRA Platform. Our third-party vendors receive Personal Information only as reasonably necessary to complete services for AIRA, and are contractually bound to



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maintain confidentiality of information and prohibited from using or disclosing Personal Information without permission from AIRA.

### As Required by Law

If we determine on a good faith basis that we are required by law (e.g., pursuant to a subpoena or judicial order) to share your personal or other information, we will endeavor to share it only to the extent we determine is reasonably necessary to comply with the request.

### Children Under 13 Years of Age

AIRA does not knowingly solicit or collect information from children under 13 years of age without obtaining explicit parental consent. If you become aware that your child has provided us with information without your consent, please contact us; upon request, we will delete your child's Personal Information from our files within a reasonable time.

### Access to Your Information

Because we value the longevity of our relationships with our members, sponsors and partners, we do retain user information in our database. If you would like to access, transfer, review, or correct your Personal Information, or request that it be deleted or restricted in use, please [contact us](#). Depending on your location or country of residence, you may have a legal right to make these requests and to contact supervisory authorities if you are not satisfied with our response.

### Changes to Privacy Policy

AIRA may change and update this Policy from time to time. We will post Policy updates to this page, and may notify members of our mailing lists of changes by email as well. We will not post updates or send email notification regarding changes to the [third-party services list](#), which may be updated from time to time. Any changes will take effect prospectively from the date of the change only; continued use of the AIRA Platform constitutes consent to any new Policy.

### Contact Information

You may find our contact information at: <http://www.immregistries.org/contact-us>. If you have any questions or requests related to your Personal Information or this Privacy Policy, please email [info@immregistries.org](mailto:info@immregistries.org).



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## Appendix 1

### AIRA and Third-Party Services

As discussed in our Privacy Policy, AIRA uses third-party vendors that provide services for our digital platforms. The following is a representative (but not necessarily exhaustive) list of some third-party features used on our digital platforms, along with links to their privacy policies:

- MemberClicks: <http://www.memberclicks.com/privacy>
- Google Analytics: <http://www.google.com/privacy.html>
- DropBox: <https://www.dropbox.com/privacy2018>
- Survey Monkey: [https://help.surveymonkey.com/categories/Privacy\\_Legal](https://help.surveymonkey.com/categories/Privacy_Legal)
- SmartyStreets: <https://smartystreets.com/legal/privacy-policy>
- Github: <https://help.github.com/articles/github-privacy-statement/>
- Media Temple: <https://mediatemple.net/legal/privacy-policy/>
- SmartSheet: <https://www.smartsheet.com/legal/privacy>
- Microsoft 365: <https://privacy.microsoft.com/en-us/privacystatement>
- Slack: <https://slack.com/privacy-policy>
- WebEx Meetings and WebEx Events: [https://www.webex.com/cisco-privacy\\_full-text.html](https://www.webex.com/cisco-privacy_full-text.html)
- Uber Conference: <https://www.uberconference.com/legal#Privacy>
- Network Solutions: <https://assets.web.com/legal/English/PrivacyPolicy.pdf>
- Page Kite: <https://pagekite.net/humans.txt#privacy>

Please note that AIRA and certain third-party vendors, such as Google, use first-party cookies and third-party cookies together to gather and provide information on an aggregate level about the relationship between the AIRA Platform and users' visits to it.

To opt out of certain third-party features, you can:

- Download the [Google Opt-Out Browser Add-On](#)

