

PRIVACY POLICY

Purpose: The Society for Clinical Data Management, Inc. (“SCDM”) respects the privacy of its members and non-members and is committed to protecting individual information through the adoption and compliance of this Privacy Policy. This Policy is designed to protect the privacy of members’ and non-members’ individual information obtained by SCDM.

Information Collected: This Policy applies to information SCDM may collect directly from members and non-members. SCDM may obtain individual information from an individual’s use of SCDM’s Website, including a learner’s participation in SCDM’s Certified Clinical Data Management Program, Online Education Offering, other internet-based applications, and in person contact.

Use of Information: Generally, SCDM uses information collected to improve its own web content; to respond to members and non-members interests, needs and preferences; to develop new products and services; to directly contact members and non-members; and to further SCDM’s nonprofit purposes at its discretion. SCDM uses collected information to maintain security and to evaluate traffic patterns on its website, internet-based applications, sponsored programs and events and other-related SCDM activities.

- **Member Directory:** Information available in the online SCDM membership directory is available solely for members’ reference and for conduct of SCDM business. SCDM does not sell or release member information. SCDM strictly prohibits the sale or release of individual information by anyone within SCDM and the use of individual information for the purposes of mass-commercial solicitation is strictly prohibited.
- **Credit Card Information:** SCDM does not disclose credit card account information provided by its members and/or non-members. An individual may elect to pay for certain products and/or services using his/her credit card. SCDM submits the information needed to secure payment to the appropriate clearinghouse.

Certification and Online Education: All participants enter SCDM educational internet-based activities through a password protected enrolment process. In addition, SCDM’s educational processes are internet-based and have website protections to minimize any violations by unauthorized individuals entering the SCDM website and databases to obtain participant information.

The learning records of participants (or learner) in SCDM's Online Education offerings are considered confidential and private. Learner information is released only to the individual learner upon written request to SCDM. Learner records are not released to third parties without the learner's prior written permission. Learner records are never sold to third parties for marketing or any other purposes. Any request for learner records is verified by the Membership & Customer Service Administrator or staff handling the requests received by phone or email.

All SCDM staff are required to use password-protected computers. Each educational staff member is responsible for maintaining a secure password to enter SCDM's Education Portal and databases.

SCDM has the right to include the names and affiliations of Certified Clinical Data Managers in a program directory published in any medium. The names and affiliations of applicants for certification will not be published.

Website Cookies: Cookies are files that contain information created by a web server that can be stored on a user's hard disk for future use. SCDM uses cookies only to facilitate automated activity, store and track passwords, determine appropriate solicitations, and review navigation patterns. Cookies are not used to disseminate significant information about an individual over the internet or to analyze any information that an individual has knowingly or unknowingly provided. When a participant registers, the system may ask whether the participant approves of the attachment of a cookie. If the participant declines the attachment of a cookie, the participant may not have access to the full benefits of the Website. Registration enables SCDM to better determine participant's interest areas and provide the most relevant information.

Accessing and Correcting Information: An individual may request to review and/or change his/her information collected by SCDM according to this Policy. The individual must send a written request to SCDM's Membership & Customer Service Administrator to request access to, correct or delete any personal information that the individual may have provided to SCDM. SCDM may not accommodate a request to change information if SCDM believes that the change will violate any law or legal requirement or cause the information to be incorrect.

Disclosure of Information: Except as set forth in this Policy, SCDM will not disclose individual information collected pursuant to this Policy without the individual's prior written consent. SCDM may disclose individual information to comply with any court order, law, or legal process, including to respond to any government or regulatory request.

Data Security: SCDM has implemented measures designed to secure individual information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information provided to SCDM is stored on SCDM's secure servers behind firewalls.

The safety and security of an individual's information also depends on the individual. When an individual receives, or has chosen, a password for access to certain parts of SCDM's website and

other internet-based applications/platforms, the individual is responsible for keeping the password confidential. The individual should not share his/her password with anyone.

Reporting Violations or Suspected Violations: SCDM's Membership & Customer Service Administrator, with the assistance of SCDM's IT Manager, is responsible for monitoring SCDM's privacy and information security processes. The webmaster is responsible for maintaining website protections. Any breach in confidentiality or a breach of this Policy should be immediately reported to SCDM's Membership & Customer Service Administrator.

The Membership & Customer Service Administrator is responsible for notifying SCDM's Director and/or the webmaster if a privacy or security breach occurs. SCDM will notify the individual as soon as possible in the event of a breach in privacy of his or her records.

Adopted by SCDM Board of Trustees: _____, 201__