



Privacy Policy

Effective Date: March 23rd, 2022

The American Board of Allergy and Immunology (“ABAI,” “we,” “us” or “our”) respects the privacy of the information you have entrusted to us. This Privacy Policy (“Policy”) explains how we collect, use, and disclose your information when you visit our website at www.abai.org, access our portal and using our certification services. By using our Site and Services, you acknowledge you have read and understand the terms and conditions of this Policy. If you do not agree to the terms and conditions of this Policy, please do not continue to use our Site.

Types of Information We May Collect

We gather **Personal Information** about our visitors and members so that we can better serve you. We collect the Personal Information when it is given to us voluntarily or in response to our request when you inquire about our services. Personal Information means information that can be used alone or in combination with other information to identify an individual, including first and last name, email address, telephone number, physical address, user ID and password, IP address, your organization and job title, clinical practice environment and status, education information, date of birth, state medical license status and adverse actions, additional certifications, and/or unique identification number. We may also collect **demographic information** including, race / ethnicity, gender, and geographic region.

Our members may pay for fees on our website and voluntarily provide **financial information** such as credit card numbers, security codes, expiration dates, and billing addresses. We do not retain any such information, and payment processing is conducted by our third party service provider who is compliant with the requirements of the Payment Card Industry Data Security Standard (PCI-DSS) and other security standards.

In addition, we may collect **technical information** about your computer, such as the browser type and version, browser plug-in types and versions, the operating system of your computer, the Internet Service Provider (ISP), and your location, and time zone setting. We also automatically collect information as to how our visitors were directed to our Site, how they navigate around the Site, and what products they browse. We collect this information to help us understand how visitors to our Site use our services, so that we can better manage and enhance our Site.

Occasionally we may collect information from individuals in the European Union/EEA. In such cases, “Personal Data” has the meaning described in Article 4.1 of the GDPR. We process your Personal Data based on your consent, which may be revoked at any time. We also process your Personal Data because

it is necessary to take steps to respond to your requests where you have submitted an application for examination or certification, and to provide further information to you.

How We Collect Your Information

We collect information through our Site directly from you as you voluntarily provide such information when you interact within our Site and use our Services. We may also collect information that you voluntarily provide through membership surveys that are posted on the Site.

We also use tracking technologies such as cookies and Google tags to collect data about your computer and your use of our Site. We will treat this data as personal information only where the data, or the information it is associated with, can be individually identified to you.

COOKIES are small text files placed on your device that uniquely identify your device and which a website can transfer to a user's hard drive to keep records of his or her visit to a website. We, or third parties, may use session cookies or persistent cookies. Session cookies only last for the specific duration of your visit and are deleted when you close your browser. Persistent cookies remain on your device's hard drive until you delete them or they expire. Both types of cookies enhance user experience by recalling your use of the Internet and our Site.

There are several ways to manage cookies. You can control the use of cookies at the browser level, by instructing your browser to accept cookies, disable cookies or notify you when receiving a new cookie. Please note that if you reject cookies, you may still use our website, but your ability to use some features or areas of our website may be limited. The Network Advertising Initiative also offers a means to opt-out of a number of advertising cookies. Please visit www.networkadvertising.org to learn more. Note that opting-out does not mean you will no longer receive online advertising. It does mean that the company or companies from which you opted-out will no longer deliver ads tailored to your preferences and usage patterns.

Analytics

We use Google Analytics, a third party analytic tool which uses tags to measure, analyze, and report on access to and usage of our Site. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. When you access the Site, your web browser automatically sends certain information to us and to Google, which is used to understand how visitors to our Site engage with our Site. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network. Google Analytics does not collect sensitive information on our Site, as described in the Google AdWords sensitive category restrictions.

You can opt-out of having made your activity on the Site available to Google Analytics by installing the Google Analytics opt-out browser add-on: <https://tools.google.com/dlpage/gaoptout>. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.

For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy?hl=en>

How We Use Your Information

We use your Personal Information to fulfill your requests, to provide the Services, and for our business purposes, such as:

- To respond to your requests for information and services;
- To provide you with information about our examination and certification;
- To provide examination and certification services;
- To assist in our commitment to diversity, equity and inclusion
- For our research efforts, including to better understand and serve our members;
- To anonymize data so that it is no longer identifiable to an individual;
- We analyze information we obtain automatically, including from cookies and web beacons, concerning our visitors' and members' use of, access to, and navigation of our services and their browsing activities to improve, customize, and market our Services and content; and for research, marketing, and other business purposes
- For other business and operating purposes, such as website administration, product development, contract management, fulfilment, analytics, fraud prevention, corporate governance, reporting, and legal compliance

When and Why We Disclose Your Personal Information

ABAI will share your personal information only in compliance with applicable laws and regulations.

We share personal information about you with our employees, board volunteers, vendors, specialty societies, education providers, credentialing bodies and the American Board of Medical Specialties with its member board community in the course of our business operations.

We may share personal information with our service providers, who are bound by law or contract to protect personal information and only use personal information in accordance with our instructions or the agreements we have signed. For example, we may share personal information with vendors who provide payment processing services for us.

We may also disclose personal information where needed to affect the sale or transfer of business assets, to investigate legal issues, enforce our rights, protect our property, or protect the rights, property or safety of others, or as needed support external auditing, compliance and corporate governance functions.

We may also disclose personal information in response to a request under legal process or otherwise required by law, such as in response to a subpoena, including to law enforcement agencies and courts in the United States.

We reserve the right to disclose personal information if necessary to enforce the terms and conditions governing the use of our Site and Services; or to protect the rights, property, safety, or other interests of ABAI and its members.

We reserve the right to share non-personal, non-individually identifiable information, including aggregate data, about our members at our sole discretion.

COLLECTION AND USE OF INFORMATION FROM CHILDREN

Our Site is not intended for children. We do not knowingly collect personal information from children, and none of the features of our Site is designed to attract children. In the event that we learn that a person under the age of 18 has provided personal information to us, we will delete such personal information as soon as possible.

THIRD-PARTY LINKS

Our Site may contain links to other websites. When you follow these links to those sites, the operators of those websites may collect information about you. ABAI does not review, control or monitor the practices, information or materials on any other websites, and are not responsible or liable for the communications, information, content or materials from or the practices and policies (including without limitation privacy or data collection practices or policies) of any of those sites. If you have any questions about how these other sites use your information, you should review their policies and contact them directly.

OPT-OUT

We provide you the opportunity to opt-out of promotional and/or board communications by clicking the “unsubscribe” link in email communications or by contacting us using the contact information provided below. We will process your request as soon as possible in accordance with applicable law, but please be aware that in some circumstances you may receive a few more messages until the unsubscribe request is processed.

Additionally, we may send you information regarding our Site, such as information about changes to our policies and other notices and disclosures required by law. Generally, users cannot opt-out of these communications, but they will be primarily informational in nature, rather than promotional.

Changing or Updating Your Information

We encourage our diplomates to keep their information up to date. We are ready to assist you in checking or changing your personal information. Please contact us at abai@abai.org and use the subject line “Updating my information.” We will respond to you within a reasonable time.

Rights for Individuals located in the European Union

Under the GDPR, individuals in the European Union are provided with certain rights regarding their Personal Data, as defined under that Regulation. The following section provides notice of these rights:

- **You have the right to access your Personal Data.** You have a right to know if we process any Personal Data about you and, be sent a copy of the Personal Data, along with an explanation of the purposes of the processing, and the categories of recipients to whom we have disclosed your Personal Data.

- **You have the right of rectification of your Personal Data.** You have the right to correct your Personal Data if it is inaccurate. You may change or update your information at any time by requesting access to the Personal Data that has been collected about you and confirm or change that information.
- **You have the right to have your Personal Data erased under certain circumstances.** You may exercise this right if you (a) withdraw your consent and there is no other lawful basis for processing the data; (b) if the data is no longer necessary for the purpose for which it was collected; (c) where you have objected to the use of the data for direct marketing; (d) where the data has been unlawfully processed; or (e) where erasure is necessary to comply with a legal obligation. Please note that there are also exceptions to this right that may prevent you from exercising this right. For example, if the data is necessary for the establishment, exercise, or defense of legal claims, your right to erasure will not apply.
- **You have the right to restrict the processing of your Personal Data under certain circumstances.** You may exercise this right if (a) you contest the accuracy of the Personal Data collected and retained about you; (b) if the processing is unlawful; (c) if the data is no longer necessary for the purposes of processing but it is required for the establishment, exercise, or defense of legal claims; or (d) if you have objected to the processing of your data based on the public interest or the legitimate interest of others.
- **You have the right to object to the processing of your Personal Data.** You have the right to object to direct marketing at any time. You can also object to the processing of your Personal Data which is based on legitimate interests. Likewise, you can object to the processing of your Personal Data for scientific or historical research or statistics purposes. Note that while the right to object to direct marketing is absolute, the two other rights to object are more limited.
- **You have the right to port (transfer) Personal Data you have provided to us, either to you or to another provider.** You may request to be given a copy the Personal Data that you have provided to us and that we have processed through automated means based on your consent in a commonly used, machine-readable electronic format where technologically possible, for your re-use.
- **You have a right to revoke your consent to or to opt-out of how your Personal Data is processed as described in this Policy.** You may withdraw consent to the extent that our processing of your Personal Data is based on your consent
- **You have the right to lodge a complaint.** If you have any concerns or a complaint about how your Personal Data has been or is being processed, please let us know directly by contacting us by email. You also have the right to lodge a complaint with the applicable supervisory authority in the country you live in, the country you work in, or the country where you believe your rights under applicable data protection laws have been violated.

To find out more about your data subject rights under GDPR, you may contact the data protection agency of your member country, for e.g., the Data Protection Commission of Ireland.

To exercise your rights, please contact us: our contact details are in the “Contact Us” section below. Please make it clear which right(s) you want to exercise, for example by titling your email or letter “right to object” if you wish to exercise the right to object.

SECURITY

We implement reasonable technical and organizational security measures to ensure the security of your Personal Information. Personal information is encrypted when it is transmitted to ABAI using SSL/TLS technology. The information we collect is contained behind secured networks and only accessible by authorized personnel and service providers who need access to perform their duties. Please understand, however, that no data transmissions over the Internet can be guaranteed to be 100% secure. Consequently,

ABAI cannot ensure or warrant the security of any information you transmit to us and you understand that any information that you transfer to us is done at your own risk. If we learn of a security system breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Services or providing Personal Information to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of the Services. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

INTERNATIONAL DATA TRANSFERS

ABAI is based in the U.S. If you choose to provide us with information, please understand that your Personal Information may be transferred to the U.S. and that we may transfer that information to our member boards or to other third parties, across borders, and from your country or jurisdiction to other countries or jurisdictions around the world. If you are visiting the Site from the EU or other regions with laws governing data collection and use that may differ from U.S. law, please note that you are transferring your Personal Data to the U.S. and other jurisdictions which may not have the same levels of data protection as the EU, and Personal Data may be subject to access by and disclosure to law enforcement agencies in the U.S.

We put in place appropriate operational, procedural and technical measures in order to ensure the protection of your Personal Information. You acknowledge you understand that by providing your Personal Information: (i) your Personal Information will be used for the uses identified above in accordance with this Policy; and (ii) your Personal Information may be transferred to the U.S. and other jurisdictions as indicated above, in accordance with applicable law.

BUSINESS TRANSFER

In the event that all or part of our assets are sold or acquired by another party, or in the event of a merger, we retain the right to transfer your Personal Information to the successor business. The new business would retain the right to use your Personal Information according to the terms of this privacy notice as well as to any changes to this privacy notice as instituted by the new business.

HOW WE RESPOND TO DO-NOT-TRACK SIGNALS

At this time our website does not recognize automated browser signals regarding tracking mechanisms, which may include “Do Not Track” instructions.

DATA RETENTION PERIODS

ABAI retains your Personal Information for as long as necessary for the purposes for which it was collected. In certain instances, we may keep it longer:

- For as long as necessary to comply with any legal requirement;
- For backup and disaster recovery purposes;
- For as long as necessary to protect our legal interests or otherwise pursue our legal rights and remedies; or

- For data that has been aggregated or otherwise rendered anonymous in such a manner that you are no longer identifiable, indefinitely.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to change this Policy. When we do, we will also revise the “Effective Date” at the top of this Policy. If we make material changes to the Policy, we will notify you by placing a prominent notice on our website and/or by sending you an email at the email address we have on file for you. We encourage you to periodically review this Policy to keep up to date on how we are handling your Personal Information.

CONTACT US

If you have any questions, comments or concerns about our privacy practices or this Policy, please contact us at:

American Board of Allergy and Immunology
1835 Market Street #1210
Philadelphia, PA 19102
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Fax 215-592-9411
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