#### **LAST UPDATED MAY 2018**

### **APA Privacy Policy**

The American Psychological Association ("APA") believes that the protection and privacy of your Personal Data and Non-Personal Data (collectively "Data" or "Your Data") is paramount and we value your right to privacy. APA strives to protect Data that we collect through your interaction with the APA family of websites ("APA Websites"), APA applications ("APA Apps"), APA social media tools ("APA Social Media") and other digital and non-digital spaces where APA may collect Data (APA Websites, APA Applications, and APA Social Media, and other digital and non-digital spaces, respectively, and collectively, "APA Digital Assets").

Data you provide to us through your use of APA Digital Assets helps to inform the APA about how best to provide you with a fulfilling user experience as it relates to our mission. Our goal is to insure that Your Data is secure, and that APA only uses Your Data subject to the terms and conditions set forth below.

APA is committed to working with you to obtain a fair and rapid resolution of any queries, complaints, or disputes about privacy. If you have any questions or comments about our Privacy Statement, Cookie Policy or our information collection and data protection practices, please contact DPO@apa.org or 1-800-374-2721 or 202-336-5500 from anywhere.

### **APA Privacy Statement**

BY USING APA DIGITIAL ASSETS, YOU CONSENT TO THE TERMS AND CONDITIONS OF THIS PRIVACY STATEMENT AND TO APA PROCESSING YOUR DATA FOR THE PURPOSES STATED BELOW. IF YOU DO NOT AGREE TO THE TERMS AND CONDITIONS OF THIS PRIVACY STATEMENT, PLEASE UNDERSTAND THAT YOUR USE OF APA DIGITAL ASSETS MAY NOT BE OPTIMIZED AND IN SOME INSTANCES YOU MAY NOT BE ALLOWED ACCESS TO APA DIGITAL ASSETS THAT REQUIRE APA TO VERIFY YOU AS AN AUTHORIZED USER (FOR EXAMPLE ACCESSING APA'S PSYCNET PLATFORM OR LOGGING INTO YOUR MYAPA ACCOUNT).

#### **DATA APA COLLECTS**

YOU PROVIDE DATA TO US TO CREATE YOUR ACCOUNT OR TRANSACT BUSINESS WITH US We collect Data from all visitors ("Users") to APA Digital Assets in order to interact with you. The following are examples of the types of Data we collect:

#### 1. Personal Data

"Personal Data" is Data that you provide to us, or that we may otherwise collect, that identifies you directly. This also includes information that is associated with you and could potentially identify you, including when combined with other information from or about you. We will not collect or use Personal Data except as stated in this Privacy Statement. Personal Data may include, among other things, name, postal address, telephone number, email address, payment and billing information, subscriptions or a combination of these and other Data.

#### 2. Non-Personal Data

"Non-Personal Data" can be technical information or it can be demographic information, such as your ZIP code, other geolocation data or interests. Non-Personal Data can be information that is automatically collected through the use of cookies for instance. Non-Personal Data does NOT identify you personally but may be tied together with other data to identify you. Here are some examples of the Non-Personal Data that is collected via APA Digital Assets and a description of how this information is used:

- Internet Protocol (IP) address Your IP address is a number that lets computers attached to the Internet know where to send you data such as the webpages you view. We use this information to deliver our webpages to you upon request, to tailor APA Digital Assets to the interests of our Users and to measure traffic within our APA Websites.
- Cookies APA Websites use "cookies" to improve functionality and usability. We use this
  information for planning, tracking and to improve the technical functions of our sites and
  products. By using APA Digital Assets, you are consenting to our use of cookies in accordance
  with the terms of this Privacy Statement. For more information about cookies please see
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Please note that we also consider aggregated data, which is not personally identifiable, to be Non-Personal Data.

3. **Automatically Collected Data:** When you visit APA Digital Assets, we may automatically collect Data about you through the use of cookies. This Data includes the browser or operating system that you use, your IP address, the date and time you have viewed certain pages on APA Digital Assets, by ways of example. Please see the "Use of Cookies" section below to find out more about how we use cookies and similar technologies.

### **How APA Uses Your Data**

WE USE YOUR DATA TO CONTACT YOU, PROVIDE SUPPORT FOR YOUR MEMBERSHIP, CONDUCT SURVEYS AND PERSONALIZE OUR SERVICES TO YOU.

Except to the extent necessary to fulfill our business obligations as described in this Privacy Statement, we do not sell, transfer, or otherwise disclose to third parties any of the Personal Data that we collect directly from or about you.

We use Personal Data that is collected on APA Digital Assets in the following ways:

- To provide member related services;
- To deliver services, such as educational programs, information or newsletters you request or purchase:
- To alert you to special offers, updated information and other new services from APA, other third parties, or to forward promotional materials;
- To process your order and, if necessary, to contact you regarding the status of your order;
- To fulfill the terms of a promotion;
- To ensure the Websites are relevant to your needs;
- To help us create and publish content most relevant to you;
- To request your feedback about your experience with APA;
- To notify you about a material change to this Privacy Policy, if necessary; and
- To allow you access to limited-entry areas of APA Digital Assets.
- For other business purposes that help optimize your experience as you interact with APA Digital Assets.

#### **Cookies**

COOKIES ARE USED TO RECOGNIZE USERS WHEN THEY COME BACK TO OUR SITE, TO LEARN ABOUT WHICH PAGES ARE THE MOST VISITED AND TO ASSIST WITH A SINGLE SIGN-ON ACROSS APA DIGITAL ASSETS.

Cookies are text files sent by Web servers to Web browsers and are stored on the user's computer or mobile device. If the browser is loading a page and the server requests the Data stored in the cookie, the Data contained within the cookie is sent back to the server.

Cookies contain data about the user's activities on a website and can be used by Web servers to identify and track Users as they navigate different pages on that website and can identify Users returning to that website.

Cookies may be either "persistent" or "session" cookies. APA uses persistent cookies to enable our website to recognize you when you visit or return to an APA Website. Persistent cookies will remain stored on your computer until you delete them or until it expires automatically at its expiration date. Session cookies are temporary cookies that typically expire at the end of the web browsing session on a website. APA uses session cookies to keep track of you while you navigate APA Digital Assets. A session cookie expires at the end of the user session, i.e. when the Web browser is closed.

#### How APA uses cookies

Cookies contain Data that we have previously stored from prior interactions with APA Digital Assets and may allow us to link to other Data we have about you (My APA, previous purchases, subscriptions). APA Digital Assets use Data we obtain from cookies for the following purposes:

- To recognize the user's computer when the user visits the website.
- To track some user actions only during the current website session.
- To improve the APA Digital Assets' usability.
- To analyze the use of the APA Digital Assets.\*
- To assist APA with administering the APA Digital Assets.
- To report click-through data to our advertisers.
- To share APA Digital Assets User Data with our third-party vendors.

\*We use Google Analytics to analyze the use of APA Digital Assets. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on Users' computers. The Data generated relating to our website is used to create reports about the use of the website. Google will store this Data. More information is available at Google's privacy policy at https://policies.google.com/privacy?hl=en&gl=us.

# **Third-party Cookies**

When Users visit APA Digital Assets, third-party cookies (such as Google advertising cookies) may be sent to their computers by APA's advertisers or service providers. Third party advertisers may use data obtained from these cookies:

• To track Users browsing across multiple websites.

- To build profiles of Users' Web surfing.
- To target advertisements that may be of particular interest to Users.

# **Managing Your Cookie Settings**

Most browsers allow you to control cookies through their settings preferences. However, if you limit the ability of websites to set cookies, you may limit your overall user experience, since it will no longer be personalized to you. It may also stop you from saving customized settings like login information.

### Google Analytics Advertising Features APA has Implemented

APA uses certain Google Analytics Advertising Features, which contain third party cookies. Google Analytics is a web analytics tool that helps website owners understand how visitors engage with their website. APA follows the Google Analytics policy requirements found at https://support.google.com, which are incorporated herein by reference. The specific Google Analytics Advertising Features that APA uses include only the following: Google Display Network Impression Reporting, Google Analytics Demographics and Interest Reporting, and Integrated Services that require google analytics to collect data via advertising cookies and identifiers. APA does not use the Google remarketing features. You can opt out of the foregoing Google Analytics Advertising Features by following the instructions at this link: https://tools.google.com/dlpage/gaoptout/.

#### **Release of Data to Third Parties**

The APA member and affiliate directories are available only to members and affiliates in a members-only section of the site. All members' and affiliates' names are listed in the directory, but members have the option to suppress all other information. Personal Data collected as a function of the APA Digital Assets will not be released to third parties except to further the purpose for which you provided the Data and in the following instances:

- To fulfill a service to you including answering questions, completing an order or to follow through on a sweepstakes entry.
- To affiliates, strategic partners, agents, third party marketers or other unaffiliated parties who are offering products or services that we believe may be of interest to you or who require your Personal Data for research, administrative and/or internal business purposes. These parties may use your Personal Data to contact you with an offer or advertisement related to a product or service, or they may use such Data for their own research, administration or business purposes. If you do not want us to share your Personal Data in this manner, let us know.
- To unaffiliated third-party service providers, agents or independent contractors who help us maintain our Sites and provide other administrative services to us (including, but not limited to, order processing and fulfillment, providing customer service, maintaining and analyzing data, sending customer communications on APA's behalf, and entry collection, winner selection and prize fulfillment for contests, sweepstakes and other promotions). We seek to ensure that these unaffiliated third parties will not use the Personal Data for any other purpose than to provide the administrative services for which they are responsible.
- To complete your purchase. If you choose to make a purchase on APA Digital Assets, we may collect from you your credit card number, billing address and other Data related to such purchase, and we may use such collected Data in order to fulfill your purchase. We may also

- provide such Data to unaffiliated third parties as necessary to complete your purchase (for example, to process your credit card).
- To comply with the law or in the good faith belief that such action is necessary to conform to
  the requirements of law or comply with legal process served on us, protect and defend our
  rights or property, including the rights and property of APA and APA Digital Assets or act in
  urgent circumstances to protect the personal safety of our end users.
- To third parties as part of any corporate reorganization process including, but not limited to, mergers, acquisitions, and sales of all or substantially all of our assets.
- To track and analyze non-identifying and aggregate usage and volume statistical data from our Users and provide such Data to third parties.
- To protect against potential fraud, we may verify with third parties the Data collected from APA Digital Assets. In the course of such verification, we may receive Personal Data about you from such services. In particular, if you use a credit card or debit card to purchase services with us, we may use card authorization and fraud screening services to verify that your card Data and address matches the Data that you supplied to us, and that the card has not been reported as lost or stolen.

# **Third Party Websites and Advertisers**

APA Digital Assets may provide you with links to other websites, although we do not necessarily advise that you are linking to another website. In the event you choose to access such websites, APA is not responsible for any actions or policies of those sites. Further, please note that the third party's Privacy Policy, Cookie Policy or security practices may differ from APA. APA neither assumes responsibility for, nor does it control, endorse or guarantee any aspect of your use of the linked site. We recommend that you check the Privacy Policy, Cookie Policy and other pertinent security practices of such a party before providing Personal Data to it.

APA may also permit advertisers, third party ad networks or other advertising companies to serve advertisements on APA Digital Assets. Please be advised that such companies may gather Data about your visit to APA Digital Assets (through cookies, web beacons and other technologies) to enable such advertising companies to market products or services to you, to monitor which ads have been served to your browser and which Web pages you were viewing when such ads were delivered. Follow this link to learn more: http://optout.networkadvertising.org/?c=1#!/

PLEASE NOTE THAT THIS POLICY DOES NOT COVER THE COLLECTION AND USE OF DATA BY SUCH ADVERTISING COMPANIES.

#### Forums, Chat Rooms and Other Public Posting Areas

Please note that any Data you include in a message you post to any chat room, forum or other public posting area is available to others. If you don't want people to know your e-mail address, for example, don't include it in any message you post publicly. PLEASE BE EXTREMELY CAREFUL WHEN DISCLOSING ANY DATA IN CHAT ROOMS, FORUMS AND OTHER PUBLIC POSTING AREAS. WE ARE NOT RESPONSIBLE FOR THE USE BY OTHERS OF THE DATA THAT YOU DISCLOSE IN CHAT ROOMS, FORUMS AND OTHER PUBLIC POSTING AREAS

#### **Opt-Out of Communications**

We communicate with Users on a regular basis via email. For example, we will use your email address to contact you regarding membership renewal and dues payments, APA elections, to confirm a request you have made of APA, to send you notice of upcoming payments that are due, to send you information about changes to our products and services or to send notices and other disclosures as required by law. Generally, members cannot opt-out of these communications since it is necessary to keep members of informed of specific information regarding membership and actions related thereto.

APA provides you the opportunity to exercise an opt-out choice if you do not want to receive other types of communications from us, such as messages or updates from us regarding new services and products offered on APA Digital Assets or if you do not want us to share your Personal Data with third parties. For emails, you may opt-out by clicking on the "unsubscribe" link within the text of an email. We will process your request to unsubscribe as soon as possible, but please be aware that in some circumstances you may receive a few more messages until the unsubscribe is processed. If you have elected to receive notices to your mobile device via text message, you may opt-out by replying "STOP" to such mobile message. You may receive a confirmatory text message in response to your "STOP" request and you hereby consent to receipt of such confirmation.

As noted above, to opt out of the Google Analytics advertising features outlined above, follow the instructions at this link: https://tools.google.com/dlpage/gaoptout.

### **Your Choices & Obligations**

# **Data Retention**

We keep your Data for as long as you are a Member or as long as your relationship with APA Digital Assets continues and as required by law. We retain your Data while your membership is active or as necessary to continue to provide Services including fulfilling orders, accessing PsycNET or APA Style Central, etc. This includes Data you or others provided to us and Data obtained from your use of APA Digital Assets. There may be some instances where we retain Non-Personal Data in a depersonalized or aggregated form.

# **Rights to Access and Control Your Personal Data**

You can access, change or delete Your Data if you have a MyAPA account by logging into your account. You can also email us at **DPO@apa.org or 1-800-374-2721 or 202-336-5500 from anywhere**. We collect Your Data in many ways, most often where you provide it to us, and we provide you with several options for collecting, using and sharing of Your Data, including deleting or correcting Data you have provided to us. We offer you settings to control and manage Your Data through your MyAPA account.

# For Personal Data that we have about you:

Delete Data: You can ask us to erase or delete all or some of Your Data(for example if you resign from being a member) and we will work hard to honor all requests in a timely manner. In some instances we may not be able to delete your Personal Data in order to comply with applicable laws (for example, it is necessary to keep the financial records of a transaction with you).

Change or Correct Data: You can edit some of Your Data through your My APA account. You can also ask us to change, update or fix your data in certain cases, particularly if it's inaccurate.

Object to, or Limit or Restrict, Use of Data: You can ask us to stop using all or some of Your Data.

Right to Access and/or Take Your Data: You have the right to see Your Data and take your data and we will work with you to be sure we can provide the most complete set of Your Data and a secure way to transfer Your Data.

Resignation/Account Closure: We will keep some of Your Data even after you resign your membership with APA or close your MyAPA account in order to fulfill any final service requests. Please note that we will retain Your Data even after you have resigned your membership or closed your MyAPA account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our User Agreement, or fulfill your request to "unsubscribe" from further messages from us. We will retain depersonalized Data after your account has been closed.

Your Data may continue to be accessed by others until they refresh their cache.

Please note that APA will not delete or restrict access to Data about you where you have published in an APA journal or other APA publication including Division journals and/or newsletters. We will not delete historical Data that reference your service to APA or its Divisions in governance. We will not delete any comments or posts you have made on any of APA's social media accounts or on any other of APA's Digital Assets.

#### **Website Security**

No data transmissions over the Internet can be guaranteed to be 100 percent secure. Consequently, we cannot ensure or warrant the security of any Data you transmit to us and you understand that any Data that you transfer to APA is done at your own risk. However, APA uses website security measures consistent with current best practices to protect its website, email and mailing lists. These measures include technical, procedural, monitoring and tracking steps intended to safeguard data from misuse, unauthorized access or disclosure, loss, alteration or destruction.

Credit card data is transmitted using Secure Socket Layer ("SSL") encryption or Transport Layer Security ("TLS"). Member and purchaser Data is a high priority and we use our own protective measures, as well as the capabilities of our software and hardware vendors.

We realize there can be incidents of misuse or unauthorized program incursions, as almost every website, service and user encounters. In those instances, our goals are to move quickly to isolate the problem, ensure or restore proper functionality and minimize any inconvenience to our Users. As appropriate and necessary, APA will notify the relevant authorities of these incidents of misuse or unauthorized program incursions of the APA website.

#### **Data Retention**

APA retains information only as long as necessary to accomplish the business purpose for which it was collected and to comply with its legal and contractual obligations, plus 3 years, and then securely

disposes of that information or converts it into non-personal information by aggregating it, deidentifying it, or otherwise anonymizing it so that it does not directly or indirectly identify you and cannot, with reasonable efforts, resources, and technologies, be used to reidentify you.

# **Your California Privacy Rights**

California Civil Code Section 1798.83 permits our visitors who are California residents to request certain information regarding the APA's disclosure of personal data to third parties for their direct marketing purposes. To make such a request, please contact us at dpo@apa.org or 1-800-374-2721 or 202-336-5500.

# **Children's Privacy**

APA Digital Assets, and the services APA provides to its Users, are not directed to or intended for individuals under the age of 16. We do not knowingly collect personal Data from children under 16. If we become aware that a child under the age of 16 has provided us with personal Data, we will take steps to delete such information. If you become aware that a child under the age of 16 has provided us with personal Data, please contact us at dpo@apa.org or 1-800-374-2721 or 202-336-5500.

### Assignment

In the event that all or part of our assets are sold or acquired by another party, or in the event of a merger, you grant us the right to assign the personal and non-personal Data collected via APA Digital Assets.

# **Contacting APA**

Users may contact APA through email at **DPO@apa.org or 1-800-374-2721 or 202-336-5500** from anywhere. You may also mail us directly American Psychological Association, 750 First Street NE, Washington D.C. 20002 Attn: Office of General Counsel.

### **EU User Consent**

For Users of this website located in the European Union ("EU"), APA follows the Google EU User Consent Policy found at this link: http://www.google.com/about/company/user-consent-policy.html. By voluntarily using this website, EU Users consent to APA's data collection, sharing, and usage as described above, as well consent to APA's storing and accessing of cookies as described above. Any EU user not consenting to such uses by of data and cookies by APA should not use this website.

#### **EU DATA SUBJECTS**

This section applies if you are an EU data subject (for these purposes, reference to the EU also includes the European Economic Area countries of Iceland, Liechtenstein and Norway and, where applicable, Switzerland).

APA is the data controller for processing Personal Data provided to us through APA Digital Assets. Our registered office is 750 First Street NE, Washington D.C. 20002.

Subject to applicable law, you have the following rights in relation to your Personal Data:

- **Right of access:** If you ask us, we will confirm whether we are processing your Personal Data and, if so, provide you with a copy of that Personal Data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.
- **Right to rectification:** If your Personal Data is inaccurate or incomplete, you are entitled to have it rectified or completed. If we have shared your Personal Data with others, we will tell them about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.
- Right to erasure: You may ask us to delete or remove your Personal Data and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other interests outweigh your right to deletion). If we have shared your data with others, we will tell them about the erasure where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.
- **Right to restrict processing:** You may ask us to restrict or 'block' the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of that Personal Data or object to us processing it. We will tell you before we lift any restriction on processing. If we have shared your Personal Data with others, we will tell them about the restriction where possible. If you ask us, where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so that you can contact them directly.
- **Right to data portability:** Effective 25 May 2018, you have the right to obtain your Personal Data from us that you consented to give us or that is necessary to perform a contract with you. We will give you your Personal Data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.
- Right to object: You may ask us at any time to stop processing your Personal Data, and we will do so:
  - If we are relying on a legitimate interest to process your Personal Data unless we demonstrate compelling legitimate grounds for the processing; or
  - If we are processing your Personal Data for direct marketing.
- Rights in relation to automated decision-making and profiling: You have the right to be free
  from decisions based solely on automated processing of your Personal Data, including profiling,
  unless such profiling is necessary for entering into, or the performance of, a contract between
  you and us.
- Right to withdraw consent: If we rely on your consent to process your Personal Data, you have
  the right to withdraw that consent at any time. This will not affect the lawfulness of processing
  based on your prior consent.
- Right to lodge a complaint with the data protection authority: If you have a concern about our
  privacy practices, including the way we have handled your Personal Data, you can report it to the
  data protection authority that is authorized to hear those concerns.

#### **How We Protect Your Personal Data**

We maintain reasonable risk-based physical, technical, and administrative safeguards to protect against unauthorized and accidental disclosure, use, alteration, or destruction of personal data in our possession, and to maintain the confidentiality, integrity, availability, and resilience of our systems, data, and services. We restrict access to Personal Data to those individuals and third parties that need to know the information to accomplish the business purposes described in this Privacy Statement. We are committed to taking appropriate measures to enforce compliance with this Privacy Statement. In addition, we comply with applicable law for protecting Personal Data.

We provide reasonable security controls to protect electronic Data that we receive from you against foreseeable hazards, but please note that no data transmission over the Internet can be guaranteed to be 100% secure. In addition, use of email to transmit Data is insecure and violates APA policy. Please contact us if you need a more secure method for transmitting Data.

# **Changes in Our Privacy Policy**

APA reserves the right to make changes to our Privacy Policy at any time and for any reason without prior notice. Any changes to our Privacy Policy will be posted on this page and other places we deem appropriate so that you are always aware of our policies. We may also contact you by email with changes. Additionally, we will update the "last updated" date below.