POSNA Privacy Policy

The Pediatric Orthopaedic Society of North America ("POSNA") is committed to maintaining your confidence and trust, and accordingly has adopted this Privacy Policy ("Policy") to govern the collection, use, and storage of data. This Policy was created in order to demonstrate POSNA’s commitment to the privacy of our members and website users. Some of the personal data you provide and end user data is derived from your use of POSNA websites and mobile apps. By accessing our websites or providing your information to us, you accept and agree to the practices described in this Policy.

What Information May be Collected?

Personal Data may include, but is not limited to, name, employer, email, phone, address, credentials/certifications, credit card information, IP addresses, membership history, and details of products and/or services purchased and identifies you as an individual or is information that can be linked to you as an individual ("Personal Data"). Here is what we collect:

1. **Information from Members**

   POSNA collects certain Personal Data from its Members to ensure that POSNA records are accurate and up-to-date. This information includes:

   - First and last name
   - Home or office postal mailing address, including street name and name of city or town
   - E-mail address (when provided)
   - Telephone number(s)
   - Fax number(s) (when provided)
   - Personal website address (when provided)
   - Birth date
   - Gender
   - Orthopaedic residency program
   - Orthopaedic fellowship program(s)
   - POSNA Fellowship/Membership status
   - POSNA identification number
   - AAOS identification number (if applicable)
   - Credit card information (if purchases are made) POSNA is Payment Card Industry (PCI) compliant; no credit card numbers are stored on our servers
   - Educational background, including residency sites and dates of certification or recertification by the American Board of Orthopaedic Surgery (ABOS) the American Osteopathic Board of Orthopaedic Surgery (AOBOS), or the Royal College of Physicians and Surgeons of Canada (RCSC)
   - Participation in POSNA Continuing Medical Education (CME) programs
   - Records from purchase transactions for POSNA courses and from donations made to POSNA.
   - At their discretion, Members may supply POSNA with certain demographic information about their practices, including age specialties (adult, child), anatomical specialties, treatment specialties, and other census data
2. **Information from Non-Orthopaedic Surgeons or Orthopaedic Surgeons who are not POSNA Members**

a. POSNA collects certain Personal Data from non-orthopaedic surgeons or from orthopaedic surgeons who are not POSNA Members who wish to purchase or obtain POSNA materials or to register for a course. This information may include:

   - First and last name
   - Home or office postal mailing address, including street name and name of city or town
   - E-mail address (when provided)
   - Telephone number(s) (when provided)
   - Fax number(s) (when provided)
   - AAOS identification number
   - Credit card information (if purchases are made) - POSNA is Payment Card Industry (PCI) compliant; no credit card numbers are stored on our servers
   - Gender
   - Profession and job title; institutional affiliation

b. Records from purchase transactions for POSNA courses and from donations made to POSNA. This information may include:

   - First and last name
   - Home or office postal mailing address, including street name and name of city or town
   - E-mail address (when provided)
   - Telephone number(s) (when provided)
   - Credit card information (if purchases are made) - POSNA is Payment Card Industry (PCI) compliant; no credit card numbers are stored on our servers

b. Information from suppliers of good and services to POSNA. If POSNA pays an individual or entity for services or goods rendered, an honorarium or a stipend, POSNA collects at a minimum the following information as required by the Internal Revenue W-9 form:

   - First and last name
   - Home or office postal mailing address, including street name and name of city or town
   - Social Security Administration (SSA) number
   - Tax Identification Number

**How We Collect Personal Data**

In general, you will know when Personal Data is being collected because you will have to fill out a form or have emailed the organization. In addition, we may collect Personal Data through your use of the websites and Apps, or any discussion boards, communities or chat rooms.

Visitors may generally browse public portions of the POSNA website anonymously without providing any detailed information. However, Personal Data is required in connection with registering with the sites. In addition, Personal Data will be requested in connection with membership registration, event activities and registration, purchasing products or services, requesting additional information, signing up for newsletters, registration for an education
program or event, submitting a program application (e.g. award, certification, etc.), and/or completing the application to be a speaker at a POSNA event, or submitting questions through these sites or the mobile app.

The POSNA website is not set up to collect or distribute personal information about its visitors. It does recognize the home server of visitors, but not e-mail addresses. For example, POSNA can determine which Internet service provider our visitors use, but not the names, addresses or other information about our visitors that would allow us to identify the particular visitors to our sites.

POSNA does not knowingly collect or use any Personal Data from users under 13 years of age.

Cookies

A cookie is a piece of data stored for varying amounts of time on the user’s hard drive containing information about the user. POSNA and/or its third party vendors and service providers collect, store and use certain types of information whenever any visitor interacts with us on POSNA web sites. POSNA web sites use "cookies" or "third party web beacons" to obtain certain types of anonymous and non-personally identifiable information when visitors’ web browsers access the POSNA web sites, or advertisements and other content served by or on behalf of the www.posna.org on other web sites ("User Data").

Examples of User Data collected and analyzed include the Internet protocol (IP) address used to connect a visitor’s computer to the Internet; computer and connection information such as browser type, version, and time zone setting, browser plug-in types and versions, operating system, and platform; purchase history, which is sometimes aggregated with similar information from other visitors to create features like "top content"; the full Uniform Resource Locator (URL) clickstream to, through, and from POSNA web sites, including date and time; cookie number; and content viewed or searched for. POSNA may also use browser data such as cookies, Flash cookies (also known as Flash Local Shared Objects), or similar data on certain parts of POSNA web sites for fraud prevention and other purposes. During some visits, software tools such as JavaScript may be used to measure and collect session information, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page. POSNA may also collect technical information to help identify individual devices for fraud prevention and diagnostic purposes.

We may collect such information in order to better operate the websites so as to enhance your experience while using the website. You have the option of setting your computer to disable cookies or to alert you when cookies are being used. If you choose to disable cookies, please be aware that portions of the website may not function properly.

How will this Personal Information Be Used?

1. Personal Data may be used for internal POSNA purposes by authorized POSNA staff.
2. Personal Data may be used as noted below:
   - Upon request, POSNA may provide the names and postal mailing addresses of its Members for use in encouraging participation in Continuing Medical Education (CME) programs. Each mailing is subject to approval by the Society Director and the organization agrees to use the list only once.
   - Upon request, the POSNA may provide the names and postal mailing addresses of its Members to other not-for-profit organizations whose missions are consistent with the mission of POSNA, upon the review and approval of the Society Secretary and Executive Director.
   - POSNA makes available the POSNA Membership Directory at no charge on the POSNA website to POSNA Members only. This Membership Directory contains the name, postal mailing address, telephone, E-mail and Fax number, membership status, and year of admittance to POSNA. Use of the Private Membership Directory for the use of compiling e-mail distribution lists—for any purpose—by a POSNA member or anyone working on his or her behalf, is expressly prohibited.
   - Members of the public, through the POSNA website’s Find a Pediatric Orthopedist listing, may obtain limited information about the POSNA Member, including only the Member’s name, office postal mailing address, telephone and fax number. Use of this information to compile mailing lists—for any purpose—is expressly prohibited.
CME course registration lists, including the registrant’s name and postal mailing address, are available to exhibitors and sponsors in advance of and after the Annual Meeting.

POSNA distributes surveys to Members on behalf of third parties.

POSNA may provide the names, postal mailing addresses, e-mail addresses, and telephone and Fax numbers of POSNA Members to third party organizations with whom the POSNA has contracted to provide courses, goods or services.

POSNA, and/or third party vendors or service providers who have been engaged by POSNA to provide products and services to users, may collect, store and use User Data to provide products and services to users or to improve the users’ experience.

Unless directed otherwise at the time of collection, we may also share collected personal information with third parties who may have information or services that we believe could be helpful to members or visitors.

3. Visitors may opt-out from the sharing of collected information by contacting us.

4. POSNA reserves the right to disclose without notice any information in its possession if required to do so by law, to protect or defend POSNA’s rights or property, or to respond to an emergency.

External links

This Policy only addresses POSNA’s use and disclosure of your Personal Data. The websites may contain links to other websites, so please be aware that we are not responsible for the privacy practices of other websites, and we are not liable for their misuse of Personal Data. We encourage you to be aware that when you go to another website you should carefully read their privacy policy. Links to other sites do not imply POSNA’s endorsement of the products or services, or privacy or security practices of those websites.

Can the Personal Data Be Viewed and/or Corrected?

POSNA acknowledges that you have the right to access your Personal Data. In case you request us to remove data, we will respond within a reasonable timeframe.

In addition, POSNA encourages its Members to update and correct their Personal Data regularly online. A review and update section is included on the POSNA web site under the Member Services (www.POSNA.org/myprofile) section to make these changes.

How Long will the Personal Information be Retained?

We retain your Personal Data for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes and enforce our agreements.

How Does POSNA Use Email Address to Communicate with Members and Others?

POSNA uses e-mail to communicate with Members, Residency and Fellowship Programs in a variety of ways, including dissemination of important POSNA membership information.

With the exception of certain limited membership information such as membership dues statements, purchase receipts, registration confirmations, and ballots for the Nominating Committee and bylaws, POSNA will honor requests to unsubscribe to receipt of POSNA e-mail communications.
Rights in the European Economic Area ("EEA")

Relevant data protection laws provide you certain rights regarding the protection of your data, including:

• The right to access - Upon request, POSNA will confirm any processing of your Personal Data and, and provide you with a copy of that Personal Data in an acceptable machine-readable format;

• The right to rectification - You have the right to have POSNA correct any inaccurate Personal Data or to have POSNA complete any incomplete Personal Data;

• The right to erasure - You may ask POSNA 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);

• The right to restrict processing - You have the right to ask POSNA to suppress the processing of your Personal Data but POSNA may still store your Personal Data;

• The right to object to processing - You have the right to object to your Personal Data used in the following manners: (a) processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling); (b) direct marketing (including profiling); and (c) processing for purposes of scientific/historical research and statistics;

• The right to data portability - you have the right to obtain your Personal Data from us that you consented to give us or that is necessary to perform fulfillment of member benefits with you. We will give you your Personal Data in a structured, commonly used and machine-readable format;

• The right to complain to a supervisory authority - You have the right to file a complaint with a supervisory authority, in particular in the European Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of Personal Data relating to you infringes upon your rights; and

• The right to withdraw consent - 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.

If you wish to exercise any of the rights set out above, please contact us.

Additional Provisions Regarding the Services & Your Information

Transfer and Storage of Your Personal Data

Please note information POSNA collects about you may be transferred, processed and/or accessed by us in the United States, or another country where we, or our Service Providers operate. Please be aware Personal Data may be transferred to, and maintained on, computers located outside of your state or country where privacy laws may differ from and may not be as protective as those where you live. If you are located outside the United States and choose to allow us to collect information about you, please be aware that POSNA may transfer your Personal Data to the United States and process and store it there.

If you are located in the European Economic Area ("EEA") or other regions with laws governing data collection and use that may differ from U.S. law, please note that we may transfer information to a country or jurisdiction that does not have the same data protection laws as your jurisdiction, as disclosed in this Privacy Policy. It may also be processed by staff operating outside the EEA who work for us or for one of Service Providers, also as disclosed.

Website Hosting: POSNA works with American Technology Services (ATS) as its web hosting services provider. ATS is located in Fairfax, VA and the websites are also stored by ATS. POSNA shares your data, including Personal Data, with our website hosting Service Provider for the purposes of processing your data pursuant to your use of the Services.
Data Hosting: POSNA works with Advanced Solutions International (ASI) as its data hosting services provider. ASI is located in Alexandria, VA and POSNA’s data are stored by ASI in Microsoft Azure. POSNA shares your data, including Personal Data, with our website hosting Service Provider, American Technology Services (ATS) for the purposes of processing your data pursuant to your use of the Services.

Safely Using POSNA’s Services

Despite POSNA’s safety and privacy controls, we cannot guarantee the Services are entirely free of illegal, offensive, pornographic, or otherwise inappropriate material, or that you will not encounter inappropriate or illegal conduct from other Users when using the websites. In addition, POSNA cannot guarantee or warrant the security of any information you transmit to us, or to or from our online services. POSNA has no responsibility or liability for the security of information transmitted via the Internet. If you have questions about this Policy or the security of your Personal Data, please contact us as indicated under the “Contact POSNA” section below.

Modifications

We may amend this Policy from time to time without prior notice. If we decide to change this Policy, we will post those changes on our home page so our users are always aware of what information we collect, how we use it, and under what circumstances we disclose it, so please review it periodically.

Your continued use of our website will be deemed to be your agreement to the changed terms.

Contact POSNA

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Effective Date: This policy has been in effect since June 2008 and was most recently revised in January 2021.