

## **ARMT-HIV Privacy Policy**

*Effective: October 31st, 2019*

### **Who We Are**

The America's Regional Message Targeting for HIV (ARMT-HIV) app was created by the Health and Social Media and Technology Group (HSMTG) at the Social Action Lab at the University of Illinois, Urbana-Champaign. Our mission is to help health department staff improve the social media message posting through the analysis and recommendation of actionable, acceptable, and MSM ("men who have sex with men") appropriate social media messages targeting HIV prevention and testing.

### **Information We Collect**

The HSMTG collects information to operate our products and provide you with recommended messages. We collect both Personal Data and Other Information in support of these efforts.

"Personal Data" is information that can be used, directly or indirectly, alone or together with other information, to identify you as an individual end client. This may include your precise Location Data and your Usage Data.

We collect your Usage Data to evaluate the performance of the algorithms for message selection and to provide you with feedback. We collect Usage Data in the following ways:

- When you register with us, we collect registration and demographic details (e.g., name, username and password, email address, department of service, and location). When you set up an account, we will collect your name, username and password, email address, department of service, and location (e.g., county, state). We may also collect your postal code, contact number and information about your mobile device. In addition, we may collect certain demographic information at registration to tailor our Services to your needs.
- When you use or interact with our Services, we collect Personal Data such as Usage Data and Location Data.
- When you input the data manually into the Services,
- When you employ features in the Services that are designed to capture the data,
- When you leverage technologies that integrate/connect with our Services, such as certain mobile applications, or wearables, that share Usage Data with our Services.

**Location Data:** We may collect precise location data as part of the functionality of our Services. For example, if you want to search messages by location, we will collect your Location Data as you select. We collect Location Data through the Services so we can offer you certain location-based services (like what described above) and conduct analytics to improve the Services. We collect Location Data in several ways:

- through a device you have connected (for example, wirelessly) to our Services, and
- directly from the device on which you use our Services.

"Other Information" is information that is anonymous, aggregate, de-identified, or otherwise does not reveal your identity. We collect and use this information to understand how you and our

community as a whole use our Services and constantly enhance and develop products and services to reflect the needs of end clients.

- **Other Information:** We may collect Other Information about your use of our Services. This includes, for example, your device type, carrier provider, browser type, operating system, internet domain and host name, date and time of access as well as referring and onward URL, as well as transactional data about the activities you undertake and how you interact with the Services, such as what data is displayed, clicked on or shared, the click stream patterns, and the length of time spent on each site or page; and searches you may conduct on the Services.
- When we provide you access to third-party products and services.  
If you are accessing third-party products and services that we have made available to you via the Services, we may collect your name, email address, city, and more, in connection with your registration and access to those products and services. We will only collect and share Personal Data with third parties with your permission.

Generally, we do not consider Other Information to be Personal Data. Regardless, if we link together Other Information in a way that renders it individually identifiable, we will treat the combined information as Personal Data.

### **How We Use Personal Data**

The HSMTG uses the data we collect to operate our research, and provide our products and Services, improve existing products and services, develop new products and services, and to improve and personalize your experience interacting with us. We also use your Personal Data to communicate with you. We use the information we collect to:

#### *1. Operate our research projects and provide our Services to individuals and communities*

We use the data we collect to provide the Services that we offer. This includes operating, maintaining, and providing you with all of the content and features of the Services. For example, tracking types of messages that you posted. We also use the data that we collect for our research projects. For example, we use data to better understand our research, and to develop new products and Services to support HIV prevention and testing goals in various areas. We may also use the data to track, for example, the total number of visitors to or users of the Services, the number of visitors to each page of the Services, and the domain names of our visitors' Internet service providers to analyze our research projects and performance.

#### *2. Personalize experiences on our Services, better understand our end clients*

We use the Personal Data we collect to personalize your experience with our Services. This allows us to present products and information tailored to you, your interests and location, and to provide you with specialized route and event content based on your location. Our use of Personal Data will also allow you to participate in social sharing on our Services, connect and communicate with other users of our Services, and to create and manage your account. We also use Personal Data to better understand our end clients and the people who use our Services. This helps us to innovate, plan and design new products, services, features and functionality that our end clients need and want.

#### *3. Provide you with access to third-party products and services*

We use the data we collect to provide third parties with the information necessary to enable those third parties' fulfillment of the products or services that an end client has requested. We also use the data to better understand end client preferences and to enhance our Services. In addition, we may use the data within our Services to assist end client in meeting their dissemination goals.

#### *4. Support research and academic research*

We may use the Personal Data and Other Information we collect to conduct academic research on demographics, interests, and user preferences to gain insights about our end clients, the products and services end clients use and also to develop innovative products and services for our end clients. This analysis may be leveraged and shared outside of the HSMTG. This research may be compiled and analyzed by the HSMTG, one of our research partners or a third-party on an aggregate or de-identified basis in a way that does not identify you personally.

#### *5. Address security issues and to resolve disputes*

We use the data we collect, including Personal Data in some cases, to protect the security of our Services, employees and users, to detect and prevent fraud, to resolve disputes and to enforce our agreements and contractual commitments.

#### *6. Tailor our marketing*

We use Personal Data and Other Information to assist us in our marketing campaigns, to provide you with information on the products and Services that we think are most relevant to you and to enable us to measure the success of our marketing activities.

#### *7. Communicate with you and respond to your requests*

After you have registered or created an account with us, you have a choice of receiving announcements via email about us, our products, or Services, or special events. If you consent to such messages, we may use your Personal Data and Other Information to communicate with you about the HSMTG products or Services you have purchased or used and to notify you of other products, and Services we think may be of interest to you. You can manage your communication preferences by registering for and logging into your account. We may use your Personal Data to respond to your requests for technical support, online services, product information or to any other communication you initiate. This includes accessing your account to address technical support requests.

Please note that irrespective of your email settings, we may send you notifications pertaining to the performance of our Services, such as revision of our Terms or this Privacy Policy or other formal communications relating to products or Services you have purchased or use.

#### **How We Disclose Personal Data**

The HSMTG will only disclose your Personal Data with your knowledge and as stated in this Privacy Policy or as indicated at the time of collection. This includes disclosures that will enable us to fulfill our obligations to you and allows us to manage our research projects. We will only share your Personal Data with third parties in certain limited instances, namely with your consent, or as is necessary to complete a transaction or provide a product, service, or feature that you have requested.

We may disclose your Personal Data as described in this Privacy Policy and in the following ways:

### *1. To Affiliates, Partners, and Suppliers*

We share Personal Data within our research group. We do this to run our research project more efficiently and to have a better understanding of our end clients across all of our research lines. We also work with partners and collaborators. These third parties may have access to or process your Personal Data, but only to the extent it is necessary for them to (1) provide their products and services to us, or (2) to provide you the products and services that you have requested. For example, we may use third-party providers to assist us with marketing our products and Services, and delivering customer service and support (for example, when you have a question, complaint or technical issue with your account).

### *2. To Enable the Use of Our Services*

Personal Data that is collected through the Services may be used or disclosed to third parties in order to enable us to provide Services. For example, the HSMTG website may allow you to interface with a third-party website or application. In addition, with your knowledge and consent, our Services may gather and transfer information from other applications, functions and tools within your mobile device.

### *3. As We Grow and Change – Group Transactions and Reorganizations*

If we should ever merge with another research groups or affiliate with another institutions, or if The HSMTG should decide to buy, sell, or reorganize some parts or all of its applications, we may disclose or transfer, to the extent permitted by law and in compliance with any applicable requirements to notify you, your Personal Data to prospective or actual purchasers or successor entities in connection with one of these transactions or reorganizations.

### *4. As Required by Law and Special Circumstances*

We may be required to disclose your Personal Data if: (i) it is reasonably necessary to comply with legal process (such as a court order, subpoena, search warrant, etc.) or other legal requirements of any governmental authority, (ii) such a disclosure would potentially mitigate our liability in an actual or potential lawsuit, (iii) it is necessary to protect our legal rights or property, or (iv) it is necessary to protect the legal rights or property or physical security of others, or for the prevention or detection of crime and such disclosure is lawful.

### **Information Security**

The HSMTG is committed to protecting the security of your Personal Data. We use technical and organizational measures designed to protect your information against unauthorized access, theft, and loss. We also recommend that you take additional measures to protect yourself and your information, such as installing keeping confidential your log-in credentials and passwords, and making sure that you regularly update software and apps you have downloaded to ensure you have enabled the latest security features on your devices.

### **Data Retention**

The HSMTG will retain your Personal Data for as long as you maintain an Account or as needed to provide you the Services. We will also retain and use your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

## **How We Use Data Collection Tools and Online Advertising**

The HSMTG uses cookies and other data collection tools like web beacons to collect data that help us personalize your use of our websites and mobile applications.

### *1. Information about Cookies*

“Cookies” are data files stored within your browser when you interact with a website. These data files allow the site to recall important information about your visit and help improve your experience. By using this technology, we are able to make it easier for visitors to register for accounts, order products, enter and participate in sweepstakes and contests, and offer other functionality on our sites, like showing you ads based on your interests or browsing history. For sites that permit online shopping, we use cookies to remember and process the items in your shopping cart.

We also use cookies to collect information about which device and browser you use to access our sites so we can optimize your access and continually improve functionality. We also keep aggregated statistics about the visitors to our sites to help us continually improve how we deliver our online content. For example, we can determine if more visitors prefer certain features or pages to others, which helps us keep our sites fresh and interesting to Athletes.

### *2. Types of Cookies We Use*

We may use several different types of cookies:

#### *Required*

Strictly necessary cookies: these are cookies that are required for the operation of our websites. Without them, for example, you would not be able to register or log in for any Services that we may offer.

#### *Functional*

Analytical/usage cookies: these cookies allow us to recognize and count the number of visitors and to see how visitors move around our websites. These helps us to improve the way our websites work, for example, by ensuring that users are finding what they are looking for easily and do not encounter technical errors.

Functionality cookies: these are used to recognize you when you return to our websites. Usage of cookies of this character enables us to personalize our content for you and remember your preferences (for example, your choice of language or region).

Interaction cookies: because we are interested in your opinion about our brand and items, we use interaction cookies. These cookies allow us to communicate. For example, these cookies allow you to “like” us or recommend us on social media. These social media interaction cookies may collect information about your visit even though you do not interact with them.

### *3. How We Use Web Beacons*

Some of our websites and Services such as e-mail updates may contain electronic images called “web beacons” (sometimes known as one-pixel GIFs, clear GIFs or pixel tags). Web beacons allow us to count visitors who have viewed content on websites or pages. In e-mail messages and newsletters, web beacons allow us to count how many subscribers have read them. They also allow us to develop statistical information about the activities and features that most interest our Athletes in order to provide more personalized content. We do not use web beacons to access your Personal Data without your consent.

### *4. We Allow Third-Party Cookies*

We may allow third parties to use cookies and to advertise on our Services. We do not control the cookies of third parties. There are free programs you can download from reputable sources that allow you to set your preferences and block the vast majority of third-party cookies.

### **Managing Your Privacy Settings**

We provide you several ways to manage your privacy settings:

#### *1. Update your default settings for in-app data sharing*

The HSMTG apps are designed for your dissemination of social media messages. By default, all shareable Personal Data are set as Private. Consent must be given to enable in-app data sharing to third party services or route sharing.

Note: When you share information from our Services externally with a third-party service the information you post is governed by their privacy policy and settings.

#### *2. Set your communication preferences*

We respect your communication preferences and have created several ways for you to control how The HSMTG communicates with you:

Email Communication: You may stop receiving promotional email messages from us by following the unsubscribe instructions provided in any such message you receive.

You may also contact us through our [socialactionlab@gmail.com](mailto:socialactionlab@gmail.com) to indicate or update your communication preferences.

### **Data Breach**

In the event of a data breach, we will notify the designated privacy authority no later than 72 hours of becoming aware of the breach.

### **Withdraw consent**

You have the right to withdraw consent to this privacy policy. To withdraw your consent, you may contact us through [socialactionlab@gmail.com](mailto:socialactionlab@gmail.com) specifying your full name, email address and date of withdrawal. Upon successful processing, a confirmation email will be returned.

### **Rectify, Restrict, Limit and Delete**

You have the right to rectify, restrict, limit or delete most of your information by using the mobile application. If you are unable to do this with the default interface, please contact [socialactionlab@gmail.com](mailto:socialactionlab@gmail.com) for assistance. We will notify third parties processors who have access to your data of the deletion request.

### **Access and Portability**

You can access your information by using the mobile application. If you require additional access, please contact [socialactionlab@gmail.com](mailto:socialactionlab@gmail.com)

### **Right to Object**

You have the right to object to our processing of your Personal Data, as permitted by law. After which, we will no longer process your Personal Data unless we have compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defense of legal claims

## *2. Residents of California, United States: Your California Privacy Rights*

California Civil Code Section 1798.83 permits California residents to request and obtain from us a list of what Personal Data (if any) we disclosed to third parties for that third-party's direct marketing purposes in the preceding calendar year and the names and addresses of those third parties.

Requests may be made only once a year and are free of charge.

Under Section 1798.83, we currently do not share any Personal Data with third parties for their direct marketing purposes. If we do decide to share your Personal Data with third parties for their marketing purposes, you may opt-out of this disclosure at any time by submitting a request to our support@platysens.com, or in writing to:

The HSMTG, The Social Action Lab  
Attention: 603 E Daniel St  
University of Illinois  
Champaign IL61820

It is important to note that this opt-out does not prohibit disclosures made for non-marketing purposes or for purposes of assisting us with our own marketing.

### **Third Parties We Don't Own or Control**

Please note that this Privacy Policy does not apply to the practices of companies that we do not own or control or to people that we do not employ or manage. We encourage you to read the privacy policies of each and every device, website, and service that you use.

### **List of Partners or Third Parties who may have access to your Personal Data**

*Reposting or Third Party Platforms (with consent only)*

Twitter <https://twitter.com/en/privacy>

Instagram <https://help.instagram.com/402411646841720>

Buffer (Reposting for Instagram) <https://buffer.com/legal>

### **How to Contact Us**

If you have any questions, comments, or concerns about how we handle your Personal Data, then you may contact us through our socialactionlab@gmail.com or write to us at:

The HSMTG, The Social Action Lab  
Attention: 603 E Daniel St  
University of Illinois  
Champaign IL61820

### **Privacy Policy Updates**

We may update this Privacy Policy from time to time without prior notice. You can determine when this Policy was last revised by checking the Effective Date. We encourage you to periodically review this privacy policy to ensure you understand our privacy practices. If you have a registered account, we may notify you of any changes to our privacy policy via email and we may ask you to affirmatively acknowledge and consent to the changes the next time you use our Services.