

# Touchstone Privacy Policy

AEGIS is committed to protecting individuals' and organizations' privacy. The following policy explains how personal and organizational information will be treated as you make full use of our software and cloud services. Customers using the AEGIS application or other specialized applications developed or designed by AEGIS will be notified of updates to this policy in the release notes to the application. For customers using the AEGIS website or cloud based systems, please check the associated site for changes from time to time.

## I. Privacy Policy of AEGIS

We respect the privacy of our customers, their organizations and users, and are committed to treating all information responsibly. Accordingly, we adhere to the following:

- We collect, retain, and use customer information for legitimate business purposes only. We limit the information we collect to that which is appropriate and necessary to manage your needs, provide our services, and comply with applicable law.
- We strive to maintain the accuracy of customer information.
- AEGIS employees are responsible for protection of customer information. We have internal policies and programs designed to protect your information. It is the responsibility of each AEGIS employee to comply with our privacy policies and procedures.
- We provide security safeguards to protect customer information. Multiple security layers including sensor and host based intrusion detection, along with various firewalls and security features, protect all customer data. All customers at rest data which is taken off AEGIS site employs Advanced Encryption Standard (AES) based security.
- We limit the internal and external disclosure of customer information. Other than as set forth herein, AEGIS does not sell, trade, or rent your personal or organizational information. Any concerns regarding having your personal or organizational information being shared as set forth herein, contact us at [touchstone\\_support@aegis.net](mailto:touchstone_support@aegis.net); provided, however that to the extent you are a registered as a user of the AEGIS application, your personal and organizational information is a requirement and removal of such information will result in termination of your user account (i.e., termination of your ability to use the AEGIS application). We may share with our partners' and customers' non-personal, aggregate statistical information regarding your testing patterns, test results (details are limited to a granularity only as industry averages) and site usage, but we do not share personally (or organizationally) identifiable information with any entity that is not covered by this policy. AEGIS reaffirms all test results by any persons or organizations are kept at all times strictly confidential.
- AEGIS may provide tooling to support Organizational representatives an ability to self-publishing qualified and reviewed test results through the application or other screen capturing techniques. The Organization's authorized representative will be entirely responsible for any self-published test result either through AEGIS application, or through any self-publishing efforts. AEGIS' web based applications that support self-publishing test results allow the Organization use-case and workflow to control, update, and remove any previously published test results. Any concerns regarding having your personal or organizational information having previously been published as set forth herein, contact us at [touchstone\\_support@aegis.net](mailto:touchstone_support@aegis.net).
- **WARNING:** AEGIS Touchstone is a testing platform, and as such provides no warranty to the safety or privacy of test data. As such, is it imperative that, under no circumstances, any real patient data, personal identifiable information (PII) or Protected Health Information (PHI) as defined by the ONC or HIPAA be used by any organization, ever. In the unfortunate situation that a Touchstone Organization or User determines they have erroneously exposed personal information – please reach out to Touchstone Support. The Touchstone team has been trained on how to handle this **incident**. Do not under any circumstances transmit PII or PHI via email messages. Keep the details until AEGIS staff provides specific instruction on how to proceed, and when to advise what specific personal information was exposed.

## II. Legal Stuff

- Right to use of the site is nontransferable. User name, password and method of access should be held in confidence and protected from disclosure.
- AEGIS has no obligation to verify that anyone using your user name or password is authorized to do so.
- AEGIS sites are protected by applicable trademarks, copyright and other proprietary rights. Unauthorized copying, redistribution, publication, or other use is strictly prohibited. No ownership rights to content or materials are acquired by virtue of use of the site.
- Information communicated through the site will become the property of AEGIS. AEGIS reserves the right in its sole discretion to edit, delete or remove any content, information or documents from the site.
- Information obtained from or through the site is provided as-is; any and all warranties, express or implied, are disclaimed, including implied warranties of merchantability or fitness for a particular purpose. AEGIS is not liable for any direct, indirect, special, incidental, or consequential damages, without limitation, occasioned by use of the site, its use or inability to use. The negation of damages set forth herein is a fundamental element of the basis of the bargain between AEGIS and Users of the site, without which access to it would not be provided. This provision cannot be waived.
- Failure to enforce any provision shall not be deemed a waiver of the provision, nor of the right to enforce it.
- This Policy shall be interpreted in accordance with its fair meaning. Should any provision be held invalid or unenforceable, that provision shall be construed consistent with applicable law and all other provisions shall remain in full force and effect.

### **III. The Information We Collect**

We rely on many sources of information to help us understand and meet your needs. On occasion, we enter into agreements with other vendors to provide services in support of the AEGIS services. Currently, AEGIS does not utilize any other organization for help desk support services for the AEGIS application. However, if we should do so in the future, we would carefully stipulate under these agreements that these vendors who view personal information about you must protect this information and may not use it for any other purpose than in connection with our agreement, and otherwise, in accordance with your instructions and this Privacy Policy. We may collect personal information about you including:

- Information about your testing interactions with us, any affiliates or nonaffiliated third party users of the AEGIS application;
- Information we receive about you from applications and other forms, which we have collected by your using products or services obtained from us, one of our affiliates or nonaffiliated third party users of the AEGIS application;
- Information about you as required or permitted by law;
- Your name and other contact details, including geographic information, when you call us by phone, write to us, or contact us using our website, or establish a user account for the AEGIS application;
- Information about you when you apply for a job or contract with us (for example, your name and contact details, information about your working history and relevant records checks);
- Information we receive from our customers and other third party users of our application, including email address, mailing address, phone number and payment information;
- Information about you, if you are an individual who is, or who is employed by, one of our suppliers, contractors, related companies, agents and customers. For example, AEGIS may collect the personal information of the employees or contractors of the entities who use its application.

### **IV. Why Do We Collect Information?**

AEGIS collects the personal and organizational information it needs to provide services and information to its customers and the standards community which contributes to advancing the written/published standards, for its business operations, and to comply with the law. Depending on the circumstances, AEGIS may also use personal information about you to:

- Accurately identify you;
- To fulfill the purpose for which you are using our services;

- Protect and administer your records and accounts;
- Help us notify you of product enhancements and changes to products;
- Save you time when you apply for additional products and services;
- Comply with certain laws and regulations;
- Collect information about the usage of our services;
- Process and respond to your inquiries or requests for information about our services;
- Assist Standards Development Organizations assess the maturity and readiness of a published standard.

If you choose not to provide certain personal information to us, we may not be able to provide you with the services or information you desire.

## **V. How Do We Collect Your Information?**

AEGIS collects information related to you in several ways:

- We collect information both directly and passively (or automatically). Some personal information is gathered when you register or purchase a subscription. Information is collected to enhance Customer Service. The more information you volunteer (and the more accurate it is), the better we are able to customize your experience.
- We also collect information about your use through Internet Server logs and online tracking technologies, like cookies. (See VIII below.)
- We may also collect your information from third party users of the AEGIS application.
- In addition to the above, we may also ask you for personal information at other times, including (but not limited to) when you enroll in any of the testing programs offered by AEGIS or one of our partners, when you alter your request for services, or when you report a problem with our software or one of our services. If you contact AEGIS, we may keep a record of that correspondence. AEGIS may also occasionally ask you to complete surveys that we use for research purposes.

## **VI. How is the Collected Information Used?**

- We monitor usage to help us develop upgrades to the software and improve the design and layout of the website.
- We may also use the information we collect to occasionally notify you about important functionality changes, and special offers.
- AEGIS collects, stores and uses information from the users of its application (meaning the computer software programs), and the hosted environment (meaning a hardware/software system combination under the control of AEGIS on which the Product, or any portion thereof, is run). Aggregated versions of this information (information that does not personally identify you) may be used in many ways. For example, we may combine information about your usage patterns, with similar information obtained from other users to help enhance the application or hosted environment and our services.
- Additionally, AEGIS may keep track of de-identified information and the information you provide for our internal review, business development, research, marketing and promotional purposes, press inquiries or aggregate statistical analysis, customization, demographic patterns, and historical trends. Aggregate information may occasionally be shared with our business partners and customers, however, this information does not include any personally identifiable information about you, nor does it allow anyone to identify you individually. As AEGIS adopts additional technology, we may also gather information through other means.

## **VII. Disclosing Personal Information**

For the purposes described in this policy, we may disclose personal information:

- to any of our affiliated companies;

- to our suppliers, contractors and service providers, professional advisers, dealers and agents;
- to government agencies or individuals appointed by a government responsible for the investigation and resolution of disputes or complaints concerning use of our services;
- to anyone to whom our assets or business (or any part of it) is transferred or offered to be transferred;
- where you have otherwise consented (Touchstone Organizational Groups); or
- as otherwise required or authorized by law, or on good faith belief that disclosure is permitted or reasonably necessary.

We take commercially reasonable steps to ensure that persons and organizations to whom we disclose personal information are bound to protect the privacy of that personal information in accordance with applicable law.

### **VIII. Information Security**

We restrict access to personal information about you to those who need to have that information to provide products or services to you. If we use other companies to provide services to you, we require that they keep the information we share with them safe and secure. We have physical, logical and procedural safeguards in place that comply with legal requirements to store and secure information about you from unauthorized access, alteration and destruction. You are reminded, however, that the internet is not a secure environment, and although all reasonable care is taken, we cannot guarantee the security of information you provide via the AEGIS application.

### **IX. Cookies and IP Address Tracking**

The AEGIS website may use cookies for site administration purposes. If for any reason you wish not to take advantage of cookies, you may have your browser not accept them, although this may disable or render unusable some of the features of the AEGIS application.

AEGIS' website may also detect and use your IP address or domain name for internal traffic monitoring and capacity purposes, or to otherwise administer the application. No personal information is obtained; rather the patterns of usage of visitors to the website may be tracked for the purposes of providing improved service and content based on aggregate or statistical review of user site traffic patterns.

The AEGIS application may contain links to other websites. AEGIS is not responsible for the privacy practices or the content of such other websites. The privacy policies applicable to such other websites may differ substantially from this Privacy Policy so we advise you to read them before using those websites. AEGIS will not be liable for any use of those websites.

### **X. Consent**

By using the AEGIS application, you acknowledge that you have read this Privacy Policy, consent to the collection, use and disclosure of this information by AEGIS, including any sensitive information, and are bound by its terms. If you are accepting this on behalf of a Party other than yourself, you represent that you have legal authority to bind that Party, consent hereto constituting such acceptance. When we change our Privacy Policy, we will post those changes in this document so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it. AEGIS reserves the right, at any time, to modify, alter or update these policies. This policy is effective as of December 1, 2017 and may be modified from time to time. In the event you have any inquiries regarding these privacy matters, please contact us at [touchstone\\_support@aegis.net](mailto:touchstone_support@aegis.net).

Individuals in the UK (United Kingdom), the EU (European Union) or the EEA (European Economic Area) may have certain rights regarding their personal information. To exercise these rights, please contact AEGIS's Privacy Officer, Mario Hyland, Senior Vice President, [mario.hyland@aegis.net](mailto:mario.hyland@aegis.net). Information processed in the United States may not offer the same level of protection as the privacy laws of your own jurisdiction. By providing us your information, you acknowledge the transfer, storage and use of the information.

## **XI. Additional Provisions**

Access, Correction and Complaints Handling. Any issues, questions, complaints that you have regarding the access, correction and/or handling of your information must be addressed with AEGIS's Privacy Officer, Mario Hyland, Senior Vice President, [mario.hyland@aegis.net](mailto:mario.hyland@aegis.net).

Destruction of Personal Data. AEGIS retains personal information for only as long as necessary to fulfil the stated purposes, or as required by law or regulation. Thereafter, except in the event of a governmental audit, investigation, or pending litigation, records containing personal data are destroyed by either deleting them from electronic files (including back-up and archived files) or properly disposing of hard copies and electronic media (disks or backup tapes), such as in a shredder or document destruction repository.

Further Information. If you would like further information about our privacy policies or practices please contact our Privacy Officer: Mario Hyland, Senior Vice President, [mario.hyland@aegis.net](mailto:mario.hyland@aegis.net).

AEGIS.net, Inc.

Email: [Touchstone\\_Support@aegis.net](mailto:Touchstone_Support@aegis.net)

P.O. Box 3897

Merrifield, VA 22116

United States