

# Awareness Journals Privacy Policy

The *Awareness* journal is the official academic journal of Sri Sathya Sai University for Human Excellence and this Privacy Policy addresses our website (<u>https://awarenessjournals.com/</u>), the parent university website (<u>https://sssuhe.ac.in/</u>), as well as its other affiliated entities. We take privacy issues seriously and are committed to protecting your personal information. Please take a moment to review our Privacy Policy.

This Policy explains our practices regarding your personal information, including how we collect, use, and share your personal information, and your rights regarding the personal information we collect when you use our websites. When you submit information and/or make enquiries, you agree to let us collect and use your personal information as described in this Privacy Policy.

Please read through this Policy in its entirety and understand its terms. We may update the Policy from time to time, so please check it as needed.

#### This Policy describes the:

- Personal Information We Collect
- How we collect Your Personal Information
- How we use Your Personal Information
- How we share Your Personal Information with Third Parties
- How we PROTECT Your Personal Information
- Your Rights and Choices
- Other Information
- Changes to this Policy
- Privacy Information for users in the EU, EEA and UK.

#### PERSONAL INFORMATION WE COLLECT

#### Information You Provide to Us

We may collect, use, store and transfer different kinds of Personal Information about you, which we have grouped together as follows:

- Identifiers such as your first name, last name, alias, National Provider Identifier (NPI), ORCiD number, profile photograph, unique identifiers and potential online identifiers (e.g., cookies).
- **Contact Information** such as your mailing address, email address, and telephone numbers.

- Sensitive Information such as location data associated with your IP address; your race, ethnicity, and interest in receiving information about a particular topic. Race and ethnicity will be collected only for purposes of diversity, equity and inclusion on a voluntary basis from authors and reviewers when they interact with our manuscript processing system, and examined in an aggregated and de-identified manner.
- **Demographic Information** such as age and gender. Gender will be collected only for diversity, equity and inclusion purposes on a voluntary basis from authors and reviewers when they interact with our manuscript processing system and examined on an aggregated and de-identified basis.
- Financial Information is NOT requested because all services are rendered free-of-cost.
- **Profile Data** such as CV, education, occupation and professional background, specialty, professional board membership, certifications, school name, year in school, year of graduation, services you obtain from us, your comments on our content, your registration to participate in events (either in-person or online), and when you submit material to the journal.
- **Technical Information** such as your hardware model, internet protocol (IP) address, other unique identifiers, operating system version, browser type and settings, and the settings of the device you use to access the journal.
- **Usage Data** such as information about the services you use, the date and time, the duration of your usage, the files downloaded or viewed, and other information about your interaction with content offered through the journal.
- Notices and Communications Information such as your preferences in receiving notices from us and third parties, email communications, and your communication preferences.
- **Inference Data** including inferences drawn from the Personal Information identified above.

For each of these categories of Personal Information, we will not hold such information longer than is reasonably necessary for the disclosed purpose and as required by law.

# HOW WE COLLECT YOUR PERSONAL INFORMATION

### Information You Provide to Us

We may collect Personal Information from you that you voluntarily provide to us in various ways, including, but not limited to, when you:

- Submit an inquiry or comment using our online contact form;
- Call, email or otherwise communicate with us;
- Respond to surveys or other communications;
- Register with our journal; and
- Otherwise use or interact with our journal.

### Information We Collect from You

<u>Information You Voluntarily Provide</u>. We may collect Personal Information from you that you voluntarily provide to us in various ways, including when you contact us or otherwise interact with us.

Automated technologies or interactions. As is true of most websites, we receive and store certain types of Personal Information whenever you interact with our journal. This information may include Technical and Usage Data. You may manage how your mobile device and mobile browser share location information with us, as well as how your mobile browser handles cookies and related technologies by adjusting your mobile device privacy and security settings. Please

refer to instructions provided by your mobile service provider or the manufacturer of your device to learn how to adjust your settings.

<u>Cookies and Tracking Technologies.</u> We and our service providers use cookies, web beacons, pixels, and other tracking technology to recognize your browser or device and to capture and remember certain information about your activities on our websites. For example, cookies help us gather information about which pages you visit so that we can understand what web pages are of interest to users. We use both session ID cookies and persistent cookies. For the session ID cookie, the data is temporarily stored on your computer, but once you close your browser the cookie terminates. A persistent cookie is a small text file stored on your hard drive for an extended period of time. This allows us to track your activities while using our websites or interacting with our services and help improve the functionality, navigation, and performance of our services. If you prefer, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off cookies by adjusting your browser settings. If you turn off your cookies, some of the features of the website may not function properly. You can manage your cookie preferences through your Internet browser. Modern browsers allow you to change your cookie settings. These settings are usually found in the "options" or "preferences" menu of your browser. You can find out more about cookies, including how to see what cookies have been set and how to manage and delete them, at allaboutcookies.org. If you would like to opt-out of cookies, see our <u>Cookie Opt Out</u> below.

#### **Information We Collect from Third Parties**

We may collect Personal Information from various third parties, including those listed below. We do not control third-party websites and are not responsible for any information they may collect. The collection, use, and disclosure of Personal Information received from third parties is governed by the privacy policies listed on the website where the information was collected by the third party and/or submitted by the user. Third parties may send their own cookies and pixel tags to you, and may collect information and use it in a way that is different from this Policy. Please carefully review these third-party privacy policies to understand how your information may be collected, used and disclosed by these third parties.

<u>National Provider Identifier (NPI)</u>. We may collect NPI numbers from third parties and match those numbers to personal information in our system to provide you with content and services tailored to your individual interests and needs.

<u>Third Party Service Providers</u>. We collect Personal Information from service providers including website hosting platforms and email service providers.

Third Party Partners. In some cases, we may work with third-party partners to help deliver notices on our behalf across the Internet. We collect Personal Information received from third party partners that may place or recognize Cookies and Tracking Technologies to track anonymous information, in part, to measure and analyze the efficacy of their services. They may also have the ability to link the information they collect when you use their services, such as the identifier for the device you are using, with other information they collect elsewhere on the Internet to gain additional insights into their target audience. We only share pseudonymous information with such third parties that does not include an individual's name, email address, or contact information.

<u>Google Analytics</u>. We use third party cookies such as those provided by Google Analytics to assist us in better understanding our visitors. These cookies collect Technical Information such as IP address and Usage or Click Stream Data, such as the length of time a user spends on a

page, the pages a user visits, and the websites a user visits before and after visiting our Services. Based on this information, Google Analytics compiles data about website traffic and interactions, which we use to offer better user experiences and tools in the future. For information on how to opt-out from Google Analytics, <u>here</u>.

**Your 'Do Not Track' Browser Setting.** Some web browsers incorporate a Do Not Track ("DNT") feature that signals to the websites that you visit that you do not want to have your online activity tracked. At this time, our websites do not respond to DNT signals. Other third party websites may keep track of your browsing activities when they provide you with content, which enables them to customize what they present to you on their websites.

# HOW WE USE YOUR PERSONAL INFORMATION

We will use your Personal Information for the following purposes: *Transactional Purposes:* 

- Process, fulfill, and deliver your requests for content and services;
- Where applicable, report points and credits to credentialing organizations; and
- Provide customer support.

Notification Purposes:

- Provide content to individuals in an effort to create a personally relevant experience;
- Contact you periodically with information, surveys, and offers relating to our services, unless you have indicated you do not wish to receive such further information;
- Information collected automatically is used to monitor users' interests and usage patterns in order to help us enhance and improve our service offerings; and

Other Business Purposes:

- Information about race, ethnicity and gender you provide voluntarily as an author or reviewer will be used for diversity, equity and inclusion purposes.
- Resolve disputes and troubleshoot problems and support;
- Enforce our terms and this Policy;
- Customize, measure and improve our services and content;
- To protect our interests, including establishing, exercising and defending legal rights and claims;
- As necessary to comply with legal requirements, to prevent fraud, to cooperate with law enforcement and regulatory authorities, and to stop other prohibited, illegal, or harmful activities; and
- For purposes disclosed at the time you provide/we request your Personal Information or as otherwise set forth in this Policy.

### HOW WE SHARE YOUR PERSONAL INFORMATION

We share your Personal Information with third parties in the ways described below. Information You Instruct Us to Share. You may be presented with a survey or an option on our services to have us send certain information to third parties or give them access to it. If you choose to do so, your Personal Information and other information may be disclosed to such third parties and all information you disclose will be subject to the third-party privacy policies and practices of such third parties.

**Trusted Partners.** We may share your Personal Information with medical credentialing and accreditation organizations in connection with our continuing medical education and maintenance of certification offerings. Trusted Partners are obligated to maintain your personal

information as confidential and have access to your personal information only as necessary to perform their requested functions on your behalf.

**Other Business Partners.** We may share aggregated or pseudonymous information (including demographic information, race, ethnicity or gender) with partners, such as publishers, editors, measurement analytics, apps, or other companies. We may also share personal information with third parties who enter into contractual relationships with us. These business partners may include direct service providers, publishers and unaffiliated third parties.

**Service Providers.** We may use third-party service providers to perform certain business services and may disclose Personal Information to such service providers as needed for them to perform these business services. Business services provided include, but are not limited to, hosting vendors, user service providers, data analytics and customer support providers, IT service providers, list managers, communications services, website development services, payment processing services, compliance services, analytics services, and survey services.

Advertisers. We <u>do not</u> rent or sell our subscriber list, which includes personal identifiers such as subscriber names and postal addresses, to third parties that have products or services of interest to our subscribers. We do not share your email address or other information. We may also share your name and email address with LinkedIn and other social media sites to provide you with tailored content about our services. If you do not want us to rent your postal address information or share your name and email address with LinkedIn and other social media sites to provide you with journal content, please contact us at: <u>awareness.journals@sssuhe.ac.in</u>.

**Legal Process.** Subject to applicable law, we may disclose information about you: (i) if we are required to do so by law, regulation or legal process, such as a subpoena; (ii) in response to requests by government entities, such as law enforcement authorities; (iii) when we believe disclosure is necessary or appropriate to prevent any physical, financial or other harm, injury or loss to you; or (iv) in connection with an investigation of suspected or actual unlawful activity.

#### HOW WE PROTECT YOUR PERSONAL INFORMATION

We have reasonable security measures in place to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a genuine need to know. They will only process your Personal Information on your instructions, and they are subject to a duty of confidentiality.

We endeavor to keep your Personal Information confidential and protected against unauthorized access, misuse or alteration with commercially reasonable physical, technical, and administrative measures. However, as effective as these measures are, no security system is invincible. We cannot guarantee the security of electronic data nor can we guarantee that the information you supply will not be intercepted.

### **OTHER INFORMATION**

### Cookie Opt-Out

We and our partners use cookies to enable you to receive customized notices, content or services, and to provide us with certain information. To opt-out of these cookies, please visit <u>optout.aboutads.info</u>. If you decide to opt-out, it will affect our ability to provide you with content and will prevent us from controlling the frequency with which you may view particular sites.

### **User-Generated Content Forums**

Any data or Personal Information that you submit to us as user-generated content becomes

public and may be used by the SSSUHE in connection with its services and other offerings in any and all media.

### **Cross-Border Transfer of Your Information**

The journal is headquartered in the United States. Your Personal Information may be transferred outside of your country of residence to the United States or another country for processing. By using our services, you consent to the collection, international transfer, storage, and processing of your information outside of your country of residence, in which case the personal data protection rules may differ from the rules in your country. For persons in the EU, EEA and UK, please see Privacy Information for Users in the EU, EEA and UK below.

### Children

Our Services are intended for adult use only and are not directed towards children, minors, or anyone under the age of 18. If you are under the age of 13, you are not authorized to provide us with any Personal Information. If the parent or guardian of a child under 13 believes that the child has provided us with any Personal Information, the parent or guardian of that child should contact us at our email address (<u>awareness.journals@sssuhe.ac.in</u>) to have this Personal Information.

### YOUR RIGHTS AND CHOICES

We are a not-for-profit entity and therefore, we are not required to comply with the California Consumer Privacy Act of 2018 ("CCPA") and its amendments. We do however take privacy issues seriously and while we may choose to offer you some rights regarding your Personal Information, those rights are not offered pursuant to CCPA and its amendments and may be rescinded by us at any time.

**Right to Know:** You have the right to know the categories of Personal Information that we collect about you over the past 12 months, the categories of sources from which the Personal Information was collected, the purposes for which the Personal Information was collected, shared, and the categories of third parties with whom we share the Personal Information, and the specific pieces of personal information we collected about you.

**Right to Correct:** You have the right to correct inaccurate personal information that we maintain about you.

**Right to Delete:** You have the right to request that we delete Personal Information that we collected from you and retained, subject to certain exceptions.

**Right to Opt-Out of the data sharing:** You have the right to opt out of the future sharing of your Personal Information. As noted above, we may share certain information with partners or social media sites. In doing so, we may make available or transfer your Personal Information (e.g., Identifiers and Contact Information) to companies (e.g., advertising agencies, advertising servers, sponsored content providers, social media platforms and other similar technology companies). Making such information available to third parties could be considered by some as a "sale" of data. You may adjust your device or browser's settings to limit how your online usage data and device data is shared with third parties or request to opt-out.

**Right to Limit the Use or Disclosure of Sensitive Personal Information:** You have the right to limit the use of your Sensitive Personal Information to that which is necessary to perform services or provide the goods you request. Please note that the only Sensitive Information that will be shared is your IP address. Race and ethnicity will be collected only for diversity, equity and inclusion purposes on a voluntary basis from authors and reviewers and shared on an aggregated and de-identified basis.

**Non-Discrimination:** Unless permitted by applicable law, we will not discriminate against you for exercising any of your privacy rights under CCPA or applicable law, including by, but not limited to:

- 1. Denying you goods or services;
- 2. Charging you different rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- 3. Providing you a different level of quality of goods or services; or
- 4. Suggesting that you will receive a different price or rate for goods or services or a different level of quality of goods or services.

**Exercising Your Rights** – Only you or an authorized agent may make a verifiable consumer request related to your Personal Information. Each of these rights may be exercised by sending an email to: <u>awareness.journals@sssuhe.ac.in</u>.

**Designating a Third-Party to Act on Your Behalf** – In order to designate a third party to act on your behalf, that person must be registered with the California Secretary of State and must have valid written evidence of authority from you to act on your behalf, e.g., a validly executed Power of Attorney or some other written, notarized documentation that they can provide to us. Absent such documentation, we reserve the right to refuse to comply with third-party requests for information.

**Verifying Your Requests** – During the verification process, depending on the nature of your request, e.g., whether you are seeking access to information versus deleting information, we will first seek to verify your identity against known information in our environment, such as your name, e-mail address, and telephone. Upon receiving your request, we may also contact you via email and/or other secured communication channel to verify your identity. In certain instances, e.g., a mismatch against known information or where you are seeking information on behalf of another person with authorization, we may seek additional verification from you, which may be in the form of you providing a copy of a valid, government issued identification or a notarized attestation.

### **Response Timing and Format**

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

**Exceptions** – We may deny certain requests, in whole or in part, based on our legal rights and obligations. For example, we may retain personal information as permitted by law, such as for tax or recordkeeping or to comply with legal obligations, to process transactions, perform continuing obligations, and facilitate requests.

# **CHANGES TO THIS POLICY**

This Privacy Policy may be periodically updated. We will post a notice that this policy has been amended by revising the "Last updated" date at the top of this page. Use of our service constitutes consent to any policy then in effect.

### PRIVACY INFORMATION FOR USERS IN THE EU, EEA AND UK

For our users in the European Union and UK we are providing some additional information below as required by the EU General Data Protection Regulation ("GDPR") and UK General Data Protection Regulations (together, "GDPR").

Please make sure you also consult our general privacy policy above for complete information.

### 1. Controller

The data controller for the journal's services is: Dean, Research & Innovation Council, Sri Sathya Sai University for Human Excellence, HXJ3+4QQ, Navanihal, Karnataka 585313, India.

# 2. Data Protection Officer

You can contact our Data Protection Officer at: awareness.journals@sssuhe.ac.in.

# 3. Additional Information about Processing of Personal Data

**Awareness** will process your personal data only as it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract (Art. 6 (1) (b) GDPR), on the basis of your express and voluntary consent (Art. 6 (1) (a) GDPR), in order to comply with a legal obligation to which MMS is subject (Art. 6 (1) (c) GDPR); see e.g. the "Compliance with Legal Process" section of our general privacy policy) or as otherwise permitted by applicable law.

# 3.1 Processing for or Prior to Entering into a Contract

In most cases processing of your personal data will be on this legal basis. For details on which categories of personal data, from which sources and for which purposes your information may be collected and used in relation to which services offered by SSSUHE, please refer to the general privacy policy above.

# 3.2 Processing on the Basis of Your Consent

In some situations, and for some Services or application we may ask you to provide express, voluntary consent as a basis for processing your personal information. For details on which categories of personal data, from which sources and for which purposes your information may be collected and used in relation to which services offered by *Awareness*, please refer to the information in the respective consent declaration and to the general privacy policy above. You may at any time revoke a consent granted hereunder in accordance with GDPR. In case of revocation, SSSUHE will not process the personal data subject to this consent any longer unless legally required to do so. However, any revocation of your consent has by law no effect on past processing of personal data by *Awareness* up to the point in time of your revocation. Furthermore, if your use of a service, requires your consent, *Awareness* will no longer be able to provide the relevant service to you after your revocation.

# 3.3 In Order to Comply with a Legal Obligation

In some cases, we have to process data to comply with a legal obligation to which we are subjected (see e.g., the "Compliance with Legal Process" section of our general privacy policy).

In such cases our processing of such data will be restricted to what is required to fulfil our legal obligations.

### 3.4 Aggregated Anonymous or Pseudonymous Use of Data

In order to maintain or improve the quality or a Service or to delivery targeted online advertisements we are using data without personally identifying you, but in an aggregated, statistical, anonymous or pseudonymous format. Please see the general privacy policy above and our cookie policy for more detailed information.

### 3.5 Duration of Processing of Personal Data

Where **Awareness** is processing and using your personal data as permitted by law (including in the context of a contract with you) or under your consent, **Awareness** will store your personal data (i) only for as long as is reasonably required to fulfill the respective purposes (including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements), or (ii) until you revoke your consent (where consent is the basis we use to process your personal data). However, where **Awareness** is required by mandatory law to retain your personal data longer or where your personal data is required for **Awareness** to assert or defend against legal claims, **Awareness** will retain your personal data, in accordance with applicable law, until the end of the relevant retention period or until the claims in question have been settled. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

#### 3.6 Where will my personal data be processed?

**Awareness** is an international journal, whereas SSSUHE is an India-based nonprofit organization. Consequently, whenever **Awareness** is using or otherwise processing your personal data for the purposes set out in its privacy policies, your data may be collected from, processed, or transferred to a country outside of the EU, UK or European Economic Area ("EEA"). Whenever we transfer your personal data out of the EU, UK or EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented: We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data. Where we use certain service providers, we may use specific contracts approved for use in the UK, EU or EEA which give personal data the same protection it has in the EU, UK or EEA.

### 3.7 No Decisions Based Solely on Automated Processing (Art. 22 GDPR)

Our processing of your personal data does not involve decisions based solely on automated processing, including profiling, which produce legal effects concerning you or similarly significantly affects you.

### 4. Data Subject's Rights under GDPR

#### 4.1 Data Access, Correction, and Deletion Right

You can request from *Awareness* at any time information about which personal data the journal processes about you and the correction or deletion of such personal data.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Please note that **Awareness** can delete your personal data only if there is no legal or contractual obligation or prevailing right of **Awareness** to retain it. Please also note that if you request that **Awareness** delete your personal data, you will not be able to continue to use a service that requires the journal's use of your personal data.

If **Awareness** uses your personal data based on your consent or to perform a contract with you, you may further request from us a copy of the personal data that you have provided. In this case, please contact the Data Protection Officer and specify the information or processing activities to which your request relates, the format in which you would like this information, and whether the personal data is to be sent to you or another recipient. Please also provide reasonable information and evidence that permits **Awareness** to judge if the request originates from you as the data subject entitled to receive such personal information and that no one else is abusively trying to access your personal data by requesting a copy of it from **Awareness**.

You can withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw consent.

Furthermore, you can request that **Awareness** restricts your personal data from any further processing in any of the following events: (i) you state that the personal data **Awareness** has about you is incorrect, (but only for as long as **Awareness** requires to check the accuracy of the relevant personal data), (ii) there is no legal basis for **Awareness** processing your personal data and you demand that **Awareness** restricts your personal data from further processing, (iii) **Awareness** no longer requires your personal data, but you claim that you require **Awareness** to retain such data in order to claim or exercise legal rights or to defend against third party claims or (iv) in case you object to the processing of your personal data by **Awareness** (based on our legitimate interest as further set out in Art. 6 (1) (f) GDPR) for as long as it is required to review as to whether **Awareness** has a prevailing interest or legal obligation in processing your personal data.

#### 4.2 Right to Lodge a Complaint

If you believe that **Awareness** is not processing your personal data in accordance with applicable EU/EEA/UK data protection laws, you can at any time lodge a complaint with the data protection authority.EU residents have the right to lodge a complaint with a data protection supervisory authority ('DPA'), usually in the country or state where you work, normally live or where any alleged infringement of data protection laws has occurred, which can be found here: ec.europa.eu/info/law/law-topic/data-protection/reform/what-are-data-protection-authorities-dpas\_en#answer. UK residents have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK regulator for data protection issues (ico.org.uk).