



# CCHI Privacy Policy

Last Updated: 08/03/2018

The Certification Commission for Healthcare Interpreters ("CCHI," "we" or "us") is committed to respecting and protecting your privacy, and we want you to understand how we may collect information about you, including through our websites: [www.cchicertification.org](http://www.cchicertification.org), [www.ceapcchi.org](http://www.ceapcchi.org), and <http://cchiinterpreters.org> (the "Websites"), and how that information may be used, maintained and, in some cases, shared. This privacy policy ("Privacy Policy") sets forth the privacy practices and policies which also govern the Websites.

"**Personal Data**" is any information that enables us to identify you, directly or indirectly, by reference to an identifier such as your name, identification number, location data, online identifier or one or more factors specific to your physical, economic, cultural or social identity.

Our Privacy Policy is intended to describe to you how and what data we collect, and how and why we use your personal data. It also describes options we provide for you to access, update or otherwise take control of your personal data that we process.

By visiting [www.cchicertification.org](http://www.cchicertification.org), [www.ceapcchi.org](http://www.ceapcchi.org), and <http://cchiinterpreters.org>, (together the "Websites"), and by submitting your certification application(c) online at <https://cchi.learningbuilder.com>, you acknowledge that you have read and understood the processes and policies referred to in this Privacy Policy.

## Who we are

For the purposes of the General Data Protection Regulation 2016/679 (the "GDPR"), the Data Controller is Certification Commission for Healthcare Interpreters (CCHI) registered in the District of Columbia, USA, with a registered address at 1725 I Street NW, Suite 300, Washington, DC 20006.

## How to contact us

If at any time you have questions about this Privacy Policy, our practices or any of your rights described below, please contact us by sending an email to [privacy@cchicertification.org](mailto:privacy@cchicertification.org) or by mail to CCHI, 1725 I Street NW, Suite 300, Washington, DC 20006.

## What information do we collect?

We collect information so that we can provide the best possible experience when you utilize our certification and education services or purchase our products.

## Personal Data that you voluntarily submit to us

We may collect, process, and retain the following Personal Data:

- Contact information (name, email address, postal address, phone number)
- Certification information (including information needed to determine your eligibility)
- Employment and membership information
- Due payment information

- Financial transaction information (When you engage in any financial transaction through the Websites, you will be asked to provide certain financial information, such as your credit/debit card or PayPal account, and billing address. All our transactions are conducted via a secure PayPal checkout, and we will only keep this information as long as necessary to complete the transaction authorized by you.)
- Disciplinary information
- Peer review information
- Medical information (in case you seek ADA-related testing accommodation or work waiver for certification renewal).

If you provide us with a telephone number, postal address or an email address, you expressly agree that we, or our authorized agents, can use that information to contact you about CCHI and its associated activities.

### **Personal data we collect from you**

With regard to each of your visits to the Websites we will automatically collect the following information:

- Technical information (e.g., IP address)
- Information about your visit
- Location information

### **Personal data we collect from others**

This is information we receive about you if you use any of the other websites (operated by us, or another member of our group) or use any other services provided by another member of our group or us.

### **Non-Personal Data**

We collect information that is sent to us automatically by your web browser, and we may use this information to generate aggregate statistics about visitors to our Websites, including, without limitation:

- Browser type and plug-in details
- Device type (e.g., desktop, laptop, tablet, phone, etc.)
- Operating system
- Local time zone

We may use non-Personal Data for various business purposes such as providing customer service, fraud prevention, market research, and improving our Websites. Please check your web browser if you want to learn what information your browser sends or how to change your settings. We will consider this information to be Personal Data to the extent it can be used to identify you when combined with other information.

### **Cookies**

Like many websites, our Websites may use cookies to distinguish you from other users of the Websites. This helps us to analyze the use of the Websites to customize and improve the content and the layout of the Websites.

When you first access the Websites, you may receive a message advising you that cookies are in use. By continuing to browse the Websites, you agree to our use of cookies as described in this Privacy Policy.

You do not have to accept our cookies and can block them by activating the setting on your browser that allows you to refuse all or some cookies. You may also delete them after they have been placed on your hard drive. If you do not accept or delete our cookies, some areas of the Websites that you access may take more time to work or may not function properly. For more information about cookies, visit: <http://www.allaboutcookies.org>.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer, if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies on the Website [www.cchicertification.org](http://www.cchicertification.org):

- Strictly necessary cookies
- Analytical/performance cookies (e.g., Google Universal Analytics)
- Functionality cookies

We do not use any cookies on these websites: [www.ceapcchi.org](http://www.ceapcchi.org) and <http://cchiinterpreters.org>.

### **“Do not track” signals**

“Do Not Track” is an online procedure that is currently under development. Because it is not yet finalized, we adhere to the procedures set out in this Policy and do not monitor or follow any Do Not Track browser requests. We do not track users other than for aggregate statistical purposes.

### **How we use your personal data**

We will only process your Personal Data, including sharing it with third parties, where (1) you have provided your consent which can be withdrawn at any time, (2) the processing is necessary for the performance of a contract to which you are a party (including submitting an application to apply for or renew your certification), (3) we are required by law, (4) processing is required to protect your vital interests or those of another person, or (5) processing is necessary for the purposes of our legitimate commercial interests, except where such interests are overridden by your rights and interests.

We may use Personal Data for the following purposes:

#### **Personal Data you give to us**

We will use this Personal Data:

- to carry out our obligations arising from your certification application, or any other contract entered into between you and us and to provide you with the information, products and services that you request from us;
- to organize events or education products that you have purchased or registered for, and to provide you with information, and other materials, relating to the content of the event or product, the speakers, sponsors and other attendees;
- to provide our newsletter and publication, provided you have given your consent;
- to respond to your questions and provide related certification services;
- to provide you with information about other events, products and services we offer that are similar to those that you have already purchased, provided you have not opted-out of receiving that information;

- to provide you with information about events, products or services we feel may interest you, provided you have not opted-out of receiving that information;
- to transfer your information as part of a merger or sale of the business;
- to notify you about changes to our certification service; and
- to ensure that content from our Websites is presented most effectively for you and your computer.

### **Information we collect about you**

We will use this Personal Data:

- to administer our Websites and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our Websites to ensure that content is presented most effectively for you and your computer;
- as part of our efforts to keep our Websites safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- to make suggestions and recommendations to you and other users of our Websites about products or services that may interest you or them.

### **Special disclaimer for “Secure User” sections of the Websites**

CCHI operates a certain portion of each Website accessible only to users who have registered and obtained login credentials (“Secure Users”). If you are a Secure User, you agree to accurately maintain and update any information about yourself and your account that you have provided to us. You further agree that you are responsible for all activities that occur under your Secure User account. You are responsible for maintaining the confidentiality of your login credentials and you agree not to share your login credentials with any unauthorized parties. You are responsible for any Content you transmit through the specific Website. You agree, represent and warrant that any Content you transmit through the specific Website or to us is truthful, accurate, not misleading and offered in good faith, and that you have the right to transmit such Content. You shall not upload, post or otherwise make available on or through the specific Website any Content protected by copyright, trademark or other proprietary right of any third party without the express written permission of the owner of such right(s) or the authority to do so. See the *Terms of Use* for full details.

### **Personal Data we receive from other sources**

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined Personal Data for the purposes set out above (depending on the types of information we receive).

### **When we share and who can access your personal data**

We may share your Personal Data for the purposes described in this Privacy Policy with:

- a member of our team (e.g., our staff, Commissioners)
- vendors and sub-contractors who perform services for us in connection with the Websites, our certification programs, or to complete or confirm a transaction or series of transactions that you conduct with us. (We may also disclose Personal Information to service providers or suppliers if the disclosure will enable that party to perform business, professional or technical support for us.);

- analytics and search engine providers that assist us in the improvement and optimization of our Websites;
- in the event that we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets.

Compliance with legal, regulatory and law enforcement requests. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any information about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (such as subpoena requests), to protect our property and rights or the property and rights of a third party, to protect the safety of the public or any person, or to prevent or stop activity we consider to be illegal or unethical. To the extent we are legally permitted to do so, we will take reasonable steps to notify you in the event that we are required to provide your personal information to third parties as part of legal process.

We will only transfer your Personal Data to trusted third-parties who provide sufficient guarantees in respect of the technical and organizational security measures governing the processing to be carried out and who can demonstrate a commitment to compliance with those measures.

### **Selling your personal data**

We will not sell your Personal Data to third parties for their use.

### **Children and privacy**

If you are under the age of 18, please do not use or access the Websites. It is not our intention to collect or use Personal Information from anyone under 18 years of age, and we will not knowingly do so. If we are made aware that we have collected any Personal Information from children under the age of 18, and are asked to delete such information from our databases, we will promptly do so. If you have reason to believe that CCHI collected or is in possession of personal information from someone under 18 years of age, please contact us at [privacy@cchicertification.org](mailto:privacy@cchicertification.org).

### **Security**

Although we use generally-accepted technical and organizational security measures to help protect your Personal Data against loss, misuse or unauthorized disclosure, we cannot guarantee the security of information transmitted to us over the Internet.

### **Links to Other Websites**

Our Websites may contain links to other websites, however this Privacy Policy only addresses the use and disclosure of your information collected through our Websites, if any. If you choose to visit an external website linked from the Websites, you will leave our Websites. While we try to link only to websites that share our standards and respect for privacy, we are not responsible for the privacy practices of any third parties or the content of linked websites. We encourage you to read the applicable privacy policies and terms and conditions of such parties or websites.

### **Access from Outside the United States**

CCHI's services and products including those provided online via the Websites are intended for practicing and prospective healthcare interpreters in the United States. We are headquartered in the United States. Your Personal Data may be accessed by us or transferred to us in the United States or to

our affiliates, partners, merchants, or service providers who are located worldwide. If you are visiting our Websites from outside the United States, be aware that your information may be transferred to, stored, and processed in the United States where our servers are located, and our central database is operated. By using our Services and products, you consent to any transfer of this information.

### **How long we store your personal data**

We will store your Personal Data, in a form which permits us to identify you, for no longer than is necessary for the purpose for which the Personal Data is processed. We may retain and use your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements and rights, or if it is not technically reasonably feasible to remove it. Consistent with these requirements, we will try to delete your Personal Data quickly upon request.

We maintain one or more databases related to certification programs to store your Personal Data and may keep such information indefinitely.

### **Where we store your personal data**

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology.

Unfortunately, the transmission of information via the internet is not completely secure.

The Personal Data that you provide to us is generally stored on servers located in the United States. If you are located in another jurisdiction, you should be aware that once your Personal Data is submitted through our Websites, it will be transferred to our servers in the United States and that the United States currently does not have uniform data protection laws in place.

### **Your Rights**

#### **Correction and removal**

If any of the information that we have about you is incorrect, or you wish to have information (including Personal Data) removed from our records, please contact us at [info@cchicertification.org](mailto:info@cchicertification.org). We will respond to such requests for information access within 30 calendar days following receipt at the e-mail, unless we notify you that additional time will be required.

#### **Opting Out**

Additionally, if you prefer not to receive our newsletters or marketing messages from us, please let us know by clicking on the unsubscribe link within any such message that you receive, or by sending a message to us at [info@cchicertification.org](mailto:info@cchicertification.org).

#### **Your European Rights**

CCHI's services and products including those provided online via the Websites are intended for practicing and prospective healthcare interpreters in the United States.

You have the right to ask us not to process your Personal Data for marketing purposes. We will usually inform you (before collecting your Personal Data) if we intend to use your Personal Data for such purposes, We do not disclose your information to any third party for such purposes. You can also exercise the right by contacting us at [privacy@cchicertification.org](mailto:privacy@cchicertification.org).

Under European data protection law, in certain circumstances, you have the right to:

Request access to your Personal Data  
Request correction of your Personal Data  
Request erasure of your Personal Data  
Object to processing of your Personal Data  
Request restriction of processing your Personal Data  
Request transfer of your Personal Data  
Withdraw your consent

In addition, where you believe that CCHI has not complied with its obligations under this Privacy Policy or European law, you have the right to make a complaint to an EU Data Protection Authority, such as the UK Information Commissioner's Office.

You can exercise any of these rights by contacting us at [privacy@cchicertification.org](mailto:privacy@cchicertification.org). We will respond without undue delay, within at least 30 calendar days, unless we inform you that additional time will be required.

### **Your Californian Rights**

FOR RESIDENTS OF CALIFORNIA ONLY. Section 1798.83 of the California Civil Code requires select businesses to disclose policies relating to the sharing of certain categories of your Personal Data with third parties. CCHI does not disclose Personal data to third parties for direct marketing purposes. You may direct specific inquiries related to this right by contacting us at [privacy@cchicertification.org](mailto:privacy@cchicertification.org). We will respond to such requests for information access within 30 calendar days following receipt at the e-mail, unless we notify you that additional time will be required. Please note that we are only required to respond to each customer once per calendar year.

### **Governing Law**

By choosing to visit our Websites or provide information to us, you agree that any dispute over privacy or the terms contained in this Privacy Policy will be governed by the law of the District of Columbia.

### **Changes to this Privacy Policy**

If we make any material changes to this Privacy Policy or the way we use, share or collect Personal Data, we will notify you by revising the "Effective Date" at the top of this Privacy Policy, prominently posting an announcement of the changes on our Websites, or sending an email to the email address you most recently provided us (unless we do not have such an email address) prior to the new policy taking effect.

Any changes we make to our Privacy Policy in the future will be posted on this page and, where appropriate, a notification will be sent to you by e-mail. Please check back frequently to see any updates or changes to this Privacy Policy.

### **Affirmative Consent**

I have read the above information presented by CCHI about its Privacy Policy, including the Use of Cookies. I hereby give affirmative consent to CCHI to collect and use my personal information. I am aware that I have the right to withdraw my consent at any time with effect for the future, by e-mail to [privacy@cchicertification.org](mailto:privacy@cchicertification.org) or in writing to CCHI at its mailing address: 1725 I Street NW Suite 300, Washington, DC 20006.