

GDPR Disclosures

Effective Date: January 2, 2019.

Last Updated: January 2, 2019.

The following EEA privacy disclosures (the “**Disclosures**”) describe how we at The University of Texas MD Anderson Cancer Center and MD Anderson’s affiliates (collectively, “**we**” or “**MD Anderson**”) collect, use and share the Personal Information of individuals located in the EEA when such actions are within the scope of the European Union’s General Data Protection Regulation (“**GDPR**”) (collectively, the “**EEA Processing Activities**”). The Disclosures apply to Personal Information gathered by any means, including hardcopy (such as, paper applications or forms) and electronic means (such as, websites, mobile apps, and other digital properties), that are owned and operated by MD Anderson and that link to, expressly adopt or reference in writing the Disclosures (collectively, the “**Services**”).

All MD Anderson departments and affiliates may run and maintain their own websites on the mdanderson.org, makingcancerhistory.com, childrensartproject.org, childrensart.org domains or organization-specific domains (collectively, the “**Sites**”). The Sites may carry their own privacy notices or provide additional information relating to their activities, which will supersede or supplement the Disclosures. For further information about MD Anderson’s web presence, please see our [Legal Statements page](#).

MD Anderson is the controller of the Personal Information described below.

If you have any questions about the Disclosures or our information practices, please contact us using the options provided below.

The Disclosures apply only to the use of Personal Information in activities that are within the scope of the GDPR.

How We Collect and Use Personal Information

When we use the term “**Personal Information,**” we mean information that can be used to identify you as an individual person either directly or indirectly. We collect several categories of Personal Information through our Services, including information you provide, information collected automatically (potentially including location information or computer IP addresses), and information we obtain from third party sources.

We generally use the Personal Information that we collect to operate the various functions of this institution and provide the MD Anderson services that may be available to you.

We rely on separate and overlapping bases to process your Personal Information lawfully. By way of example only, it may be necessary for us to process your Personal Information in certain ways in order to process a transaction you have requested or otherwise in accordance with a contract between us, or in certain cases we may process your Personal Information as necessary to conduct MD Anderson’s legitimate interests, when those legitimate interests are not overridden by your rights and interests.

The ways in which we collect and use your information vary depending on the relationship between you and MD Anderson, as well as the specific MD Anderson function with which you interact. The following sub-

sections of the Disclosures are intended to describe in more detail our collection and use practices for a number of these relationships and functions.

Websites

MD Anderson collects Personal Information you provide, for example, when you enter the information into form fields on our Services. As is true of most digital platforms, we also gather certain information automatically when you use our Services. We collect and process Personal Information to operate our websites and to deliver the content and services you request.

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<i>Category of Personal Information</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<p>Contact Information including your name, home address, email address and phone number</p>	<p>To provide customer service, create and manage your MyChart account, provide notifications for which you have subscribed, respond to requests for information from you, communicate with you, send you informational notices and send you technical notices, updates, security alerts, and support and administrative messages;</p> <p>To process donations, purchases, registrations, and payments;</p> <p>To process a job, educational, or volunteer application;</p> <p>To communicate with you and send you advertisements about products, services, volunteer opportunities, newsletters, and events and provide information we think will be of interest to you; and</p> <p>To conduct research and analysis, including surveys about current Services or of potential new Services.</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Biographical Information including date of birth</p>	<p>To create and manage your MyChart and other online accounts, to verify your identity and to communicate with you; and</p> <p>To process a job or educational application.</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>

		applicable
Payment Information including payment card information	To process donations, purchases, registrations, orders, and payments	To process transactions requested by you and meet our contractual obligations Legitimate interests
Log Files including IP addresses, device identifier, browser type, domain name, operating system characteristics, data regarding the device you're using and information about your visit, such as access times, duration and how you arrived at the website	To maintain the security of our Services, for fraud detection, to address breach of policies or terms, to protect our rights and to prevent and address threats or harm; and To facilitate, manage, personalize and improve your online experience.	Legitimate interests
Cookies, Analytics and Related Tracking Technologies For more information, including on how to control your privacy settings and your ad choices, read our Cookie Policy .	To manage our Services and email messages and to collect and track information about you and your activities online over time and across different websites and social media channels for marketing purposes; and To facilitate, manage, personalize and improve your online experience.	Legitimate interests Your consent, if applicable
Location Information We may use your IP address to identify the general geographic area from which you are accessing our websites.	To conduct analytics to improve the Services, track user trends, and create custom audience lists. We connect data from different systems but do not link IP addresses to any personal information.	Legitimate interests Your consent, if applicable

Patients and Potential Patients

MD Anderson and its affiliates may collect certain information to facilitate the process of your becoming an MD Anderson patient, such as your contact information, medical records, payment-related information and insurance. **The Disclosures apply to the information that MD Anderson collects from you while you are located in the EEA.** If you travel to the United States to receive care at an MD Anderson facility, you will be provided a separate Notice of Privacy Practices that explains in more detail the types of data collected from you in the United States and the purposes for which such data are processed and shared by MD Anderson. **The Disclosures will not apply to data collected during your treatment at an MD Anderson facility located in the United States.** If you have additional questions about the processing of your data in connection with your becoming a patient at MD Anderson, you should contact the Chief Privacy Officer at MD Anderson.

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<i>Category of Personal Information</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<p>Contact Information including your name, home address, email address and phone number</p>	<p>To communicate with you about new patient appointment requests, create a medical record, create and maintain a MyChart account, notify you of upcoming appointments and schedule changes, assist with travel arrangements and Visas, provide registration or treatment-related instructions, post-visit follow-ups or results, provide cost estimates, process payments, collect data for our Tumor Registry, and maintain health records</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Biographical Information including date of birth</p>	<p>To create and manage your MyChart and other online accounts, to verify your identity and to communicate with you;</p> <p>To assist with travel arrangements and Visas; and</p> <p>To coordinate the retrieval of medical records from outside health care providers</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Health Records including past, present or future physical or mental health, conditions or treatment information, present location, present general condition, doctor’s records, surgical records, immunizations, medications, HIV status, sexually transmitted diseases, substance abuse treatments, genetic testing information and biometric information</p>	<p>To assess whether MD Anderson is an appropriate site of care for you and the feasibility of travel to MD Anderson for treatment;</p> <p>To provide you with health care services;</p> <p>To communicate internally and with external and/or other follow-up healthcare providers to manage your care, including via Health Information Exchanges and companies that compile and translate medical records, and to engage appropriate third parties to provide further health care on our behalf;</p> <p>To manage your medical information, including maintaining an electronic health record system, directory information and notification to</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Compliance with legal obligation</p> <p>To protect your vital interests</p> <p>For diagnosis and treatment</p> <p>Your consent, if applicable</p>

	<p>third parties such as family or close friends or disaster relief entities;</p> <p>To maintain our healthcare operations, including our online patient portal interface and communications, case management and care coordination, customer service and data analysis, fundraising, quality control of resources and staffing, risk management and compliance audits or facilities security;</p> <p>To obtain payment for treatment or services we provided you and to obtain prior approval or determine whether your health plan, insurer, government or other third-party payor will cover a treatment or service; and</p> <p>To comply with applicable laws and governmental orders, including for public health or safety and for Workers' Compensation programs.</p>	
<p>Family Information including family members, ages, occupations, and health</p>	<p>To provide you with health care services, maintain accurate health records, obtain payment guarantees, document contact information, and provide notification if necessary</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>To protect your vital interests</p> <p>Your consent, if applicable</p> <p>For diagnosis and treatment</p>
<p>Payment Information including past, present or future payments for your health care and your health plan, insurer or other third-party payor information</p>	<p>To obtain payment for treatment or services we provided you, including use of collections agencies, provide cost estimates, and to obtain prior approval or determine whether your health plan, insurer, government or other third-party payor will cover a treatment or service</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>

		For diagnosis and treatment
Employment History including prior employers, titles, wages, work experience, trade union membership, and disciplinary record	To process insurance coverage and payment for treatment	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable For diagnosis and treatment
Demographic Information including race, ethnicity, gender, age, education, profession, occupation, income level, marital status, and religious beliefs	To provide you with health care services and maintain accurate health records, including notification to third parties such as family or close friends, disaster relief entities or clergy; and To provide information regarding external and/or other follow-up healthcare providers to further your care.	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable For diagnosis and treatment
Log Files including IP addresses, device identifier, browser type, domain name, operating system characteristics, data regarding the device you're using and information about your visit, such as access times, duration and how you arrived at the website	To notify you of upcoming appointments, provide registration or treatment-related instructions, post-visit follow-ups or results, process payments, provide customer service assistance, facilitate MyChart use, market services and events that may be of interest to you, and maintain health records	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable

Donors

MD Anderson collects and maintains Personal Information about donors to process your donation and respond to your comments and questions. We may also use your information for future fundraising purposes, and to keep you informed about MD Anderson events, products, initiatives, and opportunities that we think may interest you.

The main way we collect Personal Information about you is when you give it to us, for example, when you complete a donation form or request information regarding donations. We may also collect Personal Information from publicly available sources or third party sources.

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<i>Category of Personal Information</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
Contact Information including your name, home address, email address and phone number	To provide confirmations of donations and respond to requests for information from you To communicate with you and send you advertisements about MD Anderson initiatives, future fundraising efforts, products, services, newsletters, and events and provide information we think will be of interest to you; and To respond to records requests.	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Payment Information including your payment card number, bank account number, routing number and other asset information, such as securities, estates or life insurances	To process your donations	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Family Information including family members, ages, occupations, and health	To process your donations; and To maintain donation records and display donation information if requested.	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Log Files including IP addresses and donation transaction numbers	To track donations and link them to specific campaigns, in order to allow MD Anderson to analyze the efficacy of its fundraising efforts	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable

Human Resources

MD Anderson collects your Personal Information when you apply for employment. Further Personal Information collection occurs at the commencement and throughout your employment at MD Anderson.

The Personal Information collected by MD Anderson, or on our behalf, is collected for the primary purpose of providing employment or enabling authorized persons to utilize MD Anderson’s services

and facilities.

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<i>Category of Personal Information</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
Contact Information including your name, home address, email address and phone number	To provide employment-related notices, forms and payments; To assist with Visas and other immigration matters; and To perform credentialing, privileging, and background checks required for participation in U.S. healthcare programs	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Payment Information including your bank account number and routing number	To process direct deposit payments	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Tax Information including tax identification number, wages and filing status	To process your tax withholdings and file required forms with tax authorities	To process transactions requested by you and meet our contractual obligations Legal compliance Legitimate interests Your consent, if applicable
Employment History including prior employers, titles, wages, work experience, and disciplinary record	To evaluate your application for employment and assess qualification for promotions and raises	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Education History including prior schools, transcripts, awards, honors and disciplinary records	To evaluate your application for employment and assess qualification for promotions and raises	To process transactions requested by you and meet our contractual obligations Legitimate interests

		Your consent, if applicable
Health Records including immunization history	To verify that you have received required vaccinations	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Criminal Records including self-reported records and publicly available records	To evaluate your application for employment and in other human resources reviews	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable

Students and Educational Appointees

MD Anderson offers a number of educational and training programs, including degree programs through the School of Health Professions and MD Anderson UTHealth Graduate School, summer research programs for students, graduate medical education for clinical residents and fellows, clinical education for non-physicians, and research nurse training programs. When you apply to one of these programs or schools, MD Anderson collects your Personal Information.

The Personal Information is collected for the primary purpose of evaluating your application and enrolling you in our training and degree programs.

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<i>Category of Personal Information</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
Contact Information including your name, home address, email address and phone number	To register you for courses or programs and communicate with you regarding your application and enrollment; To assist with Visas and other immigration matters; and To perform credentialing, privileging, and background checks required for participation in U.S. healthcare programs	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Payment Information including your bank account number and routing number	To process payment for program registration; to respond to records requests; to confirm payment	To process transactions requested by you and meet our contractual

	when positions are funded by external sources	obligations Legitimate interests Your consent, if applicable
Education History including prior schools, transcripts, awards, honors and disciplinary records	To evaluate your application; to respond to records requests	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Employment History including prior employers, titles, wages, work experience, and disciplinary record	To evaluate your application for certain online education offerings; to respond to records requests	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Health Records including immunization history	To verify that you have received required vaccinations	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Biographical Information including date of birth	To verify your identity; and To process an educational application.	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Criminal Records including self-reported records and publicly available records	To evaluate your application	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable

Online Education

MD Anderson collects your Personal Information when you apply for online education offerings. Further Personal Information collection occurs at the commencement of and throughout your online education interactions.

The Personal Information collected by MD Anderson, or on our behalf, is collected for the primary purpose of providing online education courses and, if applicable, evaluating qualification for online education certificates and credit.

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<i>Category of Personal Information</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
Contact Information including your name, home address, email address and phone number	To register you for courses and communicate with you regarding your program enrollment; to respond to records requests	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Payment Information including your payment card, bank account number and routing number	To process payment for program registration; to respond to records requests	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Employment History including prior employers, titles, wages, work experience, and disciplinary record	To evaluate your application for certain online education offerings; to respond to records requests	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Education History including prior schools, transcripts, awards, honors and disciplinary records	To evaluate your application for certain online education offerings; to respond to records requests	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable

<p>Learner Interaction Data including profile information, user interaction and input data, blog posts and community posts</p>	<p>To process your user interaction for the online education platform, publish your messages to the online education platform and to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Course Assessment Data including assignment responses, test scores, and course interactions</p>	<p>To evaluate your success in the online education offering; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Log Files including IP addresses, device identifier, browser type, domain name, operating system characteristics, data regarding the device you're using and information about your visit, such as access times, duration and how you arrived at the website</p>	<p>To evaluate your engagement with the course, maintain the security of our Services, detect fraud, address breach of policies, protect our rights and to prevent and address threats or harm; and</p> <p>To facilitate, manage, personalize and improve your online learning experience.</p>	<p>Legitimate interests</p>

Conferences

MD Anderson collects your Personal Information when you register to speak at or attend conferences sponsored by, or hosted at, MD Anderson. Further Personal Information collection occurs at the commencement of and throughout your conference interactions.

The Personal Information collected by MD Anderson, or on our behalf, is collected for the primary purpose of registering you for a conference and/or evaluating your eligibility to speak at a conference.

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<i>Category of Personal Information</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
<p>Contact Information including your name, home address, email address and phone number</p>	<p>To register you for conferences and communicate with you regarding your conference enrollment;</p> <p>To respond to records requests; and</p> <p>To advertise future conferences that may be of interest to you</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>

<p>Payment Information including your payment card, bank account number and routing number</p>	<p>To process payment for conference registration; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Employment History including prior employers, titles, wages, work experience, and disciplinary record</p>	<p>To evaluate your application for certain conferences or your eligibility to speak at such conferences; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Education History including prior schools, transcripts, awards, honors and disciplinary records</p>	<p>To evaluate your application for certain conferences or your eligibility to speak at certain conferences; to respond to records requests</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Conference Assessment Data including responses to surveys and conference evaluations</p>	<p>To evaluate your experience with the conference and improve future conference offerings</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>Your consent, if applicable</p>
<p>Cookies, Analytics and Related Tracking Technologies For more information, including on how to control your privacy settings and your ad choices, read our Cookie Policy.</p>	<p>To evaluate your engagement with the conference, manage our Services, and communicate program offerings to you; and</p> <p>To facilitate, manage, personalize and improve your online learning experience.</p>	<p>Legitimate interests</p> <p>Your consent, if applicable</p>

Research

MD Anderson researchers and affiliates may collect, use and share your Personal Information as part of a research study in which you have agreed to participate as a research subject or researcher, or in which your existing Personal Information are used. Often, when Personal Information is collected for

research purposes, you will be provided a consent and/or authorization form that explains the types of data collected and the purposes for which such data are processed and shared. In such a case, the description of the collection and use of your Personal Information provided in the consent and/or authorization form will replace, and will take precedence over, the information provided here.

Examples of data that may be collected for research purposes are listed below. These data categories are provided as examples only; not every research study will collect each of these categories of data. If you have questions about the processing of your data in connection with a research study, you should contact the MD Anderson personnel who are conducting the research or the contact persons named in any informed consent form you signed when you joined the study.

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<i>Category of Personal Information</i>	<i>Purposes of Processing</i>	<i>Legal Bases for Processing</i>
Contact Information including your name, home address, email address and phone number	To enroll you in a particular research study as a research subject or to administer the study if you are a researcher; and To conduct research and analysis, including focus groups and surveys about current Services or of potential new Services.	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Tax Information including tax identification number	To report earnings from research participation as a research subject or researcher to the tax authorities	To process transactions requested by you and meet our contractual obligations Legal compliance Legitimate interests Your consent, if applicable
Family Information including family members, ages, occupations, and health	To conduct research and improve understanding in fields of academic research	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
Employment History	To conduct research and improve	To process transactions

including prior employers, titles, wages, work experience, trade union membership, and disciplinary record	understanding in fields of academic research	requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
Education History including prior schools, transcripts, awards, honors and disciplinary records	To conduct research and improve understanding in fields of academic research	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Criminal Records including self-reported records and publicly available records	To conduct research and improve understanding in fields of academic research	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable
Demographic Information including race, ethnicity, gender, age, education, profession, occupation, income level, marital status, and religious beliefs	To conduct research and improve understanding in fields of academic research	To process transactions requested by you and meet our contractual obligations Legitimate interests Your consent, if applicable For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
Health Records including past, present or future physical or mental health, conditions or treatment information, present location,	To conduct research and improve understanding in fields of academic research	To process transactions requested by you and meet our contractual obligations

<p>present general condition, doctor's records, surgical records, immunizations, medications, HIV status, sexually transmitted diseases, and substance abuse treatments</p>		<p>Legitimate interests</p> <p>To protect your vital interests</p> <p>Your consent, if applicable</p> <p>For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes</p>
<p>Biometric Data including facial measurements, finger prints, and eye movement</p>	<p>To conduct research and improve understanding in fields of academic research</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>To protect your vital interests</p> <p>Your consent, if applicable</p> <p>For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes</p>
<p>Genetic Data Including genetic information obtained from your biological samples</p>	<p>To conduct research and improve understanding in fields of academic research</p>	<p>To process transactions requested by you and meet our contractual obligations</p> <p>Legitimate interests</p> <p>To protect your vital interests</p> <p>Your consent, if applicable</p> <p>For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes</p>
<p>Log Files including IP addresses, device identifier, browser type, domain name, operating system</p>	<p>To conduct research and improve understanding in fields of academic research; and</p>	<p>To process transactions requested by you and meet our contractual obligations</p>

characteristics, data regarding the device you're using and information about your visit, such as access times, duration and how you arrived at the website	To maintain the security of our Services, for fraud detection, to address breach of policies or terms, to protect our rights and to prevent and address threats or harm.	Legitimate interests Your consent, if applicable
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Information We Obtain from Third Party Sources

We may obtain certain Personal Information about you from third party sources which we may use to serve our legitimate interests, comply with legal obligations, perform a contract, or in some cases, in accordance with your consent.

Partners and Service Providers

We use partners and service providers, such as payment processors and analytics providers, to perform services on our behalf. Some of these partners have access to Personal Information about you that we may not otherwise have (for example, if you sign up directly with that provider) and may share some or all this information with us. We use this information to administer the Services and conduct marketing and advertising campaigns as well as to process transactions that you request.

Single Sign-On

Some of our Services allow you to register and login to our Services through a third-party platform. When you choose to login to our Services through a third-party platform, you allow us to access and collect any information from your third-party platform account permitted under the settings and privacy policy of that platform. We use this information to deliver this functionality and the Services to you.

Supplemental Information

We may receive additional Personal Information from third-party sources, such as credit reference agencies and public databases, which we may append to existing Personal Information. We may use this supplemental information to process transactions that you request and to prevent fraud, deliver relevant offers and advertising to you and to improve our operations, Services and our advertising and marketing campaigns.

Additional Uses of Personal Information

In addition to the uses described above, including, but not limited to, under the various “Purposes of Processing” and the “Information We Obtain from Third Party Sources,” we may use your Personal Information for the following purposes. Under certain circumstances these uses will be based on your consent, may be necessary to fulfill our contractual commitments to you, and/or are necessary to serve our legitimate interests in the following operations:

- Purposes that are compatible with the purposes for which we collected the data, for example, using data collected for the purposes of your treatment for research purposes;
- Conducting our operations, administering the Services and managing your accounts;
- Contacting you to respond to your requests or inquiries;

- Processing and completing your transactions including, as applicable, course registration, order confirmation, enrollment in academic groups or other programs, processing payments for online purchases and course registration, and delivering products or services;
- Providing you with newsletters, articles, service alerts or announcements, event invitations, and other information that we believe may be of interest to you;
- Providing you with promotional information, offers, initiatives, and other information that are personally tailored to your interests;
- Conducting market research, surveys, and similar inquiries to help us understand trends and needs of our users;
- Alerting you about a safety announcement;
- Preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of Personal Information, our website or data systems; or to meet legal obligations;
- Enforcing our Terms of Use and other agreements; and,
- Sending you text messages or push notifications when you sign up for one of our messaging programs. These messages may be sent by automated means. You may opt out of a text message program by following the instructions in the **Managing Communication Preferences** section.

Legitimate Interests

We rely on several legitimate interests in using and sharing your Personal Information. These interests include:

- improving and customizing our Services for you;
- understanding how our Services are being used;
- obtaining insights into usage patterns of our Services;
- exploring ways to develop and grow our operations;
- ensuring the safety and security of our Services;
- conducting research and improving understanding in fields of public interest and health; and
- enhancing protection against fraud, spam, harassment, intellectual property infringement, crime and security risks.

Data Retention

We will retain your Personal Information only for as long as is necessary for the purposes set out in the Disclosures, subject to your right, under certain circumstances, to have certain of your Personal Information erased (see **Your Rights** below), unless a longer period is required under applicable law or is needed to resolve disputes or protect our legal rights. Generally, Personal Information that MD Anderson collects will be retained and maintained as required by Texas records retention laws (Section 441.180 *et seq.* of the Texas Government Code) and rules.

How We Share and Disclose Personal Information

We share your Personal Information with third parties only in the ways described in the Disclosures. We may share your Personal Information within our family of schools, centers, and other MD Anderson units and affiliates, with our agents, vendors, consultants and other service providers who carry out work on our behalf, and to comply with the law, to protect health and safety and to enforce our legal rights.

Service Providers

We share your Personal Information with third-party service providers who complete transactions or perform services on our behalf or for your benefit, such as:

- Providing customer support
- Payment and donation processing
- Payment collection activities
- Corresponding via e-mail or postal mail
- Marketing and analytics
- Alumni outreach and engagement
- [GME stuff]
- Real time eligibility checks
- Gathering records and/or tissue from international health care providers and locations
- Translation services
- Event registration and coordination
- Course registration and coordination
- Course evaluations and assessments
- Research insights and analytics
- Performing statistical analysis
- Processing employment applications
- Processing background checks and eligibility checks for participation in federal health care programs
- Performing human resources administration

Affiliates

We may share your Personal Information with affiliated legal entities within our schools, centers, and other MD Anderson units and affiliates for purposes and uses that are consistent with the Disclosures, including marketing and analytics, and internal business purposes.

Partners

We may share your Personal Information with our partners for the purposes of administering programs and services, such as:

- Online education offerings through online platforms
- Joint research arrangements with other hospitals and universities
- Marketing and analytics
- Events with clubs and special interest groups
- Jointly sponsored conferences

Third-Party Mobile App Providers

With your knowledge and consent, the Services may gather and transfer your Personal Information, including location information, from and to other applications, functions and tools within your mobile device.

Social Media Platforms

We may also use services provided by third parties (such as social media platforms) to serve targeted ads to you on third party platforms. For more information, including on how to control your privacy settings and your ad choices, read our [Cookie Policy](#).

Legal Process, Safety and Terms Enforcement

We may disclose your Personal Information to legal or government regulatory authorities as required by applicable law. We may also disclose your Personal Information to third parties as required by applicable law in connection with claims, disputes or litigation, when otherwise required by applicable law, or if we determine its disclosure is necessary to protect the health and safety of you or us, prevent physical harm or financial loss, aid in an investigation of suspected or actual illegal activity, to enforce our policies, or to protect our property, legal rights or contractual commitments.

Business Transactions

We may disclose your information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale, or any other type of acquisition or business combination of all or any portion of our assets, or any transfer of all or a portion of our business to another company. We reserve the right to transfer any information we obtained in the event we sell or transfer all or a portion of our business or assets (including in the event of a merger, reorganization, or liquidation).

International Data Transfers

MD Anderson may transfer your Personal Information within our family of schools, centers, and other MD Anderson units and affiliates and/or to the third parties discussed above. Your Personal Information may be transferred to, stored, and processed in a country other than the one in which it was collected.

If your Personal Information was collected or stored in the EEA, we may transfer your Personal Information outside the EEA and when we do so, we rely on appropriate or suitable safeguards recognized under data protection laws.

Adequacy Decision

We may transfer your Personal Information to Andorra, Argentina, Faroe Islands, Guernsey, Israel, Isle of Man, Jersey, New Zealand, Switzerland, Uruguay and the United States (limited to those transfers governed by the EU-U.S. Privacy Shield framework), and any other countries that the European Commission has approved as providing adequate protection to Personal Information.

Standard Contractual Clauses

The European Commission has adopted standard data protection clauses, which provide safeguards for Personal Information transferred outside of the EEA. We may use Standard Contractual Clauses when transferring Personal Information from a country in the EEA to a country outside the EEA. You can request a copy of our Standard Contractual Clauses by contacting us as set forth in the **Contact Us** section below.

With Your Consent

In respect of certain cross-border Personal Information transfers, we will obtain your consent to transfer your Personal Information outside the EEA after first informing you about the possible risks of such a transfer.

By Contract

We will transfer your Personal Information outside the EEA if the transfer is necessary to the performance of a contract between you and MD Anderson, including to provide treatment to you, or if the transfer is necessary to the performance of a contract between MD Anderson and a third party, such as your physician or other health care provider located in the EEA, and the contract was entered into in your interest.

Additional Considerations

In addition, we may transfer your Personal Information outside the EEA if the transfer is necessary to establish, exercise or defend legal claims or to protect your vital interests.

Children

We will generally not collect or solicit Personal Information online from children under the age of 18 or as defined by local legal requirements, except on Services specifically directed to children. For those Services, we follow applicable data protection laws with respect to children's privacy, as set forth in the additional disclosures posted within the relevant Service.

Your Rights

We process all Personal Information in line with your rights, in each case to the extent required by and in accordance with applicable law (including in accordance with any applicable time limits and fee requirements).

GDPR-Specific Rights

These rights apply only to Personal Information collected during EEA Processing Activities. Upon request, we will provide you with information about whether we hold any of your Personal Information along with any details required to be provided to you under applicable law. In certain cases, you may also have a right:

- to rectify any of your Personal Information that is inaccurate;
- to restrict or limit the ways in which we use your Personal Information;
- to object to the processing of your Personal Information;
- to request the deletion of your Personal Information, and
- to obtain a copy of your Personal Information in an easily accessible format.

To submit a request, please contact us as set forth in the **Contact Us** section below. We will respond to your request within a reasonable time.

You also have the right to withdraw your consent to our processing of your Personal Information, if our processing is solely based on your consent. You can do this by discontinuing use of the Services, including by closing all of your online accounts with us and contacting us as set forth in the **Contact Us** section below to request that your Personal Information be deleted. If, however, you provided consent in connection with participation in a research study, and you wish to withdraw your consent, then you should follow the instructions in the research consent form as to how to do this. If you withdraw your consent to the use or sharing of your Personal Information for the purposes set out in the Disclosures, you may not have access to all (or any) of the Services, and we might not be able to provide you all (or any) of the Services. Please note that, in certain cases, we may continue to process

your Personal Information after you have withdrawn consent and requested that we delete your Personal Information, if we have another legal basis to do so. For example, we may retain certain information if we need to do so to comply with an independent legal obligation, if it is necessary to do so to pursue our legitimate interest in keeping the Services safe and secure or if deleting the information would undermine the integrity of a research study in which you are enrolled.

If you have any complaints regarding our privacy practices, you have the right to lodge a complaint with your national data protection authority (*i.e.*, supervisory authority).

Links to Third Party Sites and Social Media

The Services may include links to websites, online locations, platforms, or digital services operated by third parties for your convenience and information. Such linked websites may be operated by third parties that are not owned or controlled by MD Anderson. The Disclosures do not apply to, and we are not responsible for the content, privacy policies or data practices of third parties that collect your information. For example, they may use their own cookies, web beacons, and other tracking technologies to collect information about you and they may solicit Personal Information directly from you. We encourage you to review the privacy policies for those third parties to learn about their information practices and to familiarize yourself with their privacy practices and terms of use.

The Services may feature “like” buttons and widgets hosted by other companies. These features may collect your IP address, which page you are visiting on our Service and may set a cookie to enable the feature to function properly. The loading, functionality and your use of the plugins are governed by the privacy policy and terms of the third party that provided the plugin.

The Services may also allow you to log in using a social network or other third-party account. An example of a third-party login is “Log in with Facebook.” Logging into one of our Services with your social network or other third-party account may allow us to gather information that you give us permission to access from that social network or third party. The login feature may also transfer information to the social network or third party, such as your username and password, to authenticate you. The social network or third party may also automatically collect information such as your IP address, information about your browser and device, and the address of the web page you are visiting on our site. The login feature may also place and read cookies from that third party that may contain a unique identifier the social network or other third party assigns to you. The functionality of and your use of the login is governed by the privacy policy and terms of the party that provided the login functionality.

User Generated Content

Our Services may include features, such as message boards, that enable users to freely submit information that can be viewed by others, such as for courses, assignments, contests, blogs, videos, and other functions. Unless otherwise indicated, please remember that any information you submit or post as user-generated content to the Services becomes public information that others have the ability to access and share with third parties. You should exercise caution when deciding to disclose your personal, health-related, financial or other information in such submissions or posts. Health care-related communications on message boards are not private and can be viewed by the community of cancer discussion participants who also use these features. We cannot prevent others from using such information in a manner that may violate the Disclosures, the law, or your personal privacy and safety. We are not responsible for the privacy, security, accuracy, use,

misuse, or any other results of any information that you disclose, or that you receive from third parties, via such postings. We or others may store, display, reproduce, publish, distribute, or otherwise use such information (including the date and time you access the message board) in any media or format, and we may or may not attribute the content to you.

Updates to the Disclosures

The Disclosures are subject to occasional revision, and if we make any material changes in the way we use your Personal Information, we will notify you by sending you an email to the last email address you provided to us and/or by prominently posting notice of the changes on the Services and updating the effective date above.

Any changes to the Disclosures will be effective upon the earlier of thirty (30) calendar days following our dispatch of an email notice to you or thirty (30) calendar days following our posting of notice of the changes on the Services. These changes will be effective immediately for new users of our Services.

Please note that at all times you are responsible for updating your Personal Information to provide us with your most current email address. In the event that the last email address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our sending of the email containing such notice will nonetheless constitute effective notice of the changes described in the notice.

If you do not wish to permit changes in our use of your Personal Information, you must so notify us prior to the effective date of the changes and discontinue using the Services. Continued use of our Services, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

Managing Communication Preferences

If you have opted in to our marketing (or when permitted by law, if you have provided us with your contact information), we may send you email messages, direct mail, push notifications or other communications regarding educational offerings or other products or services depending on the method of communication selected. You may ask us not to do so when you access our websites or mobile applications, or change your preferences by updating any accounts you have with us. At any time, you may elect to discontinue receiving messages about these offerings, products, or services from us by submitting an opt-out request to the contact information below or by following the unsubscribe instructions in the form of the communication you received, as described below.

Printed Materials

To opt out of receiving printed materials about our offerings, products, or services at your postal address, such as magazines, advertisements, flyers or postcards, please write to us at the address set forth in the **Contact Us** section below. Please be sure to include your name, mailing address and description of the marketing material received exactly as they appear on the printed marketing materials you received.

Emails

To opt out of receiving communications about our offerings, products, or services via email, please send an unsubscribe request to the email address set forth in the **Contact Us** section below or click on the unsubscribe link at the bottom of the email that was sent to you and follow the directions on the resulting web page. Please note that you may continue to receive certain transactional or account-related electronic messages from us.

Text Messages

If you have consented to receive text messages, you may opt out of receiving them by using the method provided in the text message or by contacting us as set forth in the **Contact Us** section below.

Push Notifications

To opt out of receiving push notifications, please set your preferences within your device setting menu.

Contact Us

If you have any questions, comments, requests or concerns about the Disclosures or other privacy-related matters, you may contact us in the following ways:

Email: PrivacyCompliance@mdanderson.org

Phone: 1-713-745-6636

Address: Chief Privacy Officer at The University of Texas MD Anderson Cancer Center
Institutional Compliance Office, Unit 1640
P.O. Box 301407
Houston, TX, 77230-1407

For purposes of the General Data Protection Regulation:

Data Protection Officer: Chief Privacy Officer
The University of Texas MD Anderson Cancer Center
Institutional Compliance Office, Unit 1640
P.O. Box 301407
Houston, TX, 77230-1407