



Healthcare Distribution Alliance

HEALTH DELIVERED

Privacy Policy Healthcare Distribution Alliance

Effective Date: September 25, 2024

For a printable version of this Privacy Policy, please click [here](#).

Introduction

The Healthcare Distribution Alliance (“HDA,” “we,” “us,” and “our”) values your privacy. This Privacy Policy (“**Privacy Policy**”) describes how your personal information is collected, used, and shared by us when you visit websites, mobile applications, or other services controlled by HDA where this Privacy Policy is posted (collectively, the “**Sites**”). We may update this Privacy Policy from time to time, as detailed below. You should not use the Sites if you have any objections to our Privacy Policy, which is binding upon all users of the Sites. If you have a question about how your personal information is being used, you can contact us through the methods provided in the “Contact Information” section at the end of this Privacy Policy.

What Do We Mean By “Personal Information”?

“Personal information” is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. Personal information that is aggregated (e.g., compiled to create statistics that cannot identify a particular individual) or de-identified (stripped of all unique identifiers such that it cannot be linked to a particular individual) is not considered “personal information” for the purposes of this Privacy Policy.

Privacy Principles

HDA follows the following principles in order to protect your privacy:

- We do not collect any more personal information about you than is necessary under the circumstances or as disclosed in the Privacy Policy.
- We only use your personal information for the purposes we specify in this Privacy Policy, unless you agree otherwise;
- Other than as specified in this Privacy Policy, we do not share your personal information with third parties.

How We Collect and Use Your Personal Information

Our processing activities are dedicated to our overall mission as a nonprofit membership organization. These activities may include:

Providing membership benefits to HDA members

- Companies may apply for membership in HDA. Within the membership relationship, which establishes a contract between parties, HDA keeps its member companies and individuals from those companies updated on industry developments.

- The processing activities that HDA undertakes to that effect include: sending newsletters and other publications; providing access to the content on the HDA website; offering the opportunity to publish contact details within the HDA network to connect with other professionals; offering invitations to educational and industry events by email; and collecting industry data and information and sharing the results.
- The personal information that we may process in this regard are names, addresses (physical and email), country of residence, photos, phone numbers, gender, job titles, bank account and credit card information, and other voluntarily provided details. Please note that payments are processed through third-party vendors such as WorldPay, Stripe, or PayPal depending on where you make your purchase. We may use other payment processors as well.

Organizing conferences and meetings

- We organize conferences and meetings to provide educational, networking, and business opportunities.
- The processing activities that HDA undertakes for this purpose include collecting personal information of registrants and attendees; recording their registration; collecting payments from them; keeping them updated on event details by email and through mobile applications; including them on a participants list; offering them the opportunity to register as an HDA member or nonmember; and providing them with HDA newsletters and notifications of future events.
- HDA also assists in planning meetings between individuals from its member companies.
- The personal information that we may process in this regard are names, addresses (physical and email), country of residence, photos, phone numbers, gender, job titles, bank account and credit card information, and other voluntarily provided details.

Other ways we collect and use your personal information

- Processing your transactions, including, as applicable, customer service, order confirmation, billing, delivering products or services, and otherwise fulfilling our obligations to you.
- Informing website visitors of information on the industry and the activities of HDA.
- Responding to your requests or inquiries.
- Fulfilling any other purpose for which you provide your personal information to us.
- In accordance with our mission, information specific to members may be offered in restricted areas of the website.

Information Collected Automatically Via Online Tracking Technologies

We may use, and may allow certain third parties (including advertisers, third party ad networks, and other ad companies) to use cookies, web beacons, and other similar online tracking technologies to provide our Sites and to improve the performance of our advertising across the Internet.

- A cookie is a small text file that may be used to collect information about your activity on the Sites. For example, when someone visits a page within the Sites, a cookie is placed on

the user's machine (if the user accepts cookies) or is read if the user has visited the Sites previously.

- A web beacon is an electronic image, also called a "gif," that may be in the form of a "png" image, as well as iframe, script, input link, embed, object, and other tags to track usage. These web beacons may be used on our Sites to deliver cookies, and to count visits and compile statistics on usage and effectiveness of our Sites and emails.

Cookie providers, such as advertising companies, may gather personal information about your visit to the Sites or other websites to enable them to market products or services to you, to monitor which ads have been served to your browser and which webpages you were viewing when such ads were delivered.

Depending on the particular advertising services they provide, third-party advertising companies may employ first-party cookies or third-party cookies. Unlike third-party cookies, first-party cookies are hosted on HDA's servers.

The types of cookies used on our Sites can be categorized as follows:

- **Essential or Strictly Necessary Cookies** are essential to our Sites and allow you to navigate and use their features. They also help authenticate users and prevent fraudulent use of your account.
- **Performance and Analytics Cookies** are used by HDA and third parties to see how you use the Sites in order to enhance their performance and develop them according to your preferences.
- **Functional Cookies** allow us to personalize and improve your experience by recording your preferences, which allows you to visit our Sites without re-entering your username and/or password.
- **Targeting or Advertising Cookies** are used by HDA and third parties to improve the performance of our advertising across the Internet.

Google Analytics and Google Advertising: To help facilitate the delivery of relevant content, we use Google Analytics and Google Advertising. These services use cookies to report on user interactions on our and others' websites. We use the information collected for optimizing marketing, refining advertising, and/or programming strategies, and generally improving user experience. For more information about Google Analytics and how it collects and processes information, please visit: <https://policies.google.com/technologies/partner-sites>. Instructions on opting out of Google Analytics using a specific plug-in is available at the following link: <https://tools.google.com/dlpage/gaoptout>. Note that this opt-out is specific to Google activities and does not affect the activities of other ad networks or analytics providers that we may use.

If you prefer to prevent third parties from setting and accessing cookies on your computer, you may set your browser to block cookies. You will need to do this for each browser you use to access the Sites. Although this may provide you with enhanced anonymity, it may affect the functioning of our Sites. For example, blocking all cookies on the Sites may result in your browser not remembering log-

in information or other preferences. Additionally, you may remove yourself from the targeted advertising of companies within the Network Advertising Initiative by opting out [here](#), or of companies participating in the Digital Advertising Alliance program by opting out [here](#).

How We Share Your Personal Information

We may share your personal information in different ways as described below:

- With the HDA Research Foundation, HDA's research partner, and with the vendors whose products we use to provide the Sites;
- We use third party service providers to assist us in providing the Sites, including database backup providers to protect our data, conference registration vendors and credit card processing vendors. We may disclose your personal information to third parties who complete transactions or perform services on our behalf for your benefit. All service providers are authorized to use your information only as necessary to provide their respective services to us and are obligated to protect your personal information;
- To fulfill a service to you that you have requested from us, and to provide the Sites;
- To affiliates, strategic partners, agents, third-party marketers or other unaffiliated parties who are offering products or services that we believe may be of interest to you or who require your personal information for research, administrative and/or internal business purposes;
- To comply with the law or in the good faith belief that such action is necessary in order to conform to the requirements of law or comply with legal process served on us, protect and defend our rights or property, or act in urgent circumstances to protect the personal safety of our end users;
- To third parties as part of any corporate reorganization process including, but not limited to, mergers, acquisitions, sales of all or substantially all of our assets, or in the unlikely event of a bankruptcy. In these circumstances, we may disclose your personal information following completion of such transaction and/or during the assessment process pending transfer;
- To track, analyze, and measure use of our Sites and advertising, including emails; and
- To protect against potential fraud, we may verify with third parties the information collected from the Sites.

Links to Third-Party Websites

Our Sites may contain links to other websites owned and operated by third parties. After you leave our Sites, we have no control over the information collected from or about you on those third-party websites. These third parties may collect information from you when you interact directly with them. We are not responsible, and assume no liability, for the privacy policies and/or practices of any third party. The use of your information by third parties is subject to their privacy policies and terms of use. Accordingly, we encourage you to visit their sites and review their policies.

Public Posting Areas

Please note that any information you post to any public posting area is available to anyone with Internet access worldwide. If you don't want people to know your email address, for example, don't include it in any message you post publicly. PLEASE BE EXTREMELY CAREFUL WHEN

DISCLOSING ANY INFORMATION IN PUBLIC POSTING AREAS. WE ARE NOT RESPONSIBLE FOR THE USE OR DISCLOSURE BY OTHERS OF THE INFORMATION THAT YOU DISCLOSE IN PUBLIC POSTING AREAS.

Disclaimer Regarding Video Content

The Sites may contain video content, audiovisual content, or content of a like nature (collectively, “**Video Content**”). In connection with our provision of Video Content, the Sites may utilize online tracking technologies and code-based tools, including, but not limited to, Software Development Kits (“**SDKs**”) and cookies (i.e., advertising or analytics cookies) that track information about your activity and webpage-viewing history on the Sites (collectively, “**Tracking Tools**”). Tracking Tools on the Sites may result in information about your activity on the Sites being transmitted from your browser to HDA and third parties, which, in turn, may result in the display of targeted advertisements on third-party websites and platforms, including advertisements for HDA content. In addition, whether Tracking Tools on the Sites results in your browser’s transmission of information to third parties depends on a number of factors that may be outside of HDA’s knowledge or control, including what third-party websites you use, what information you have provided to such third parties, and whether (and the extent to which) you have limited the use of cookies by the operators of those third-party websites.

Disclaimer Regarding Session Replay Technology

We may use session replay technology offered by third parties to monitor how you interact with our Sites. The personal information collected by this technology may include which links you click on, pages and content you view, information that you type into our online forms, recordings of mouse clicks and movements, and information about your device or browser. Please discontinue use of the Sites if you do not consent to the collection of such information by us and third parties.

Data Security

The security of your personal information is important to us. We implement reasonable technical and organizational security measures to protect the personal information submitted to us, both during transmission and once it is received. HDA takes steps to ensure that such data remains private and confidential. We restrict access to personal information to HDA employees, contractors, and agents who need to know that information in order to operate, develop, or improve our Sites. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations.

Please understand, however, that no data transmissions over the Internet can be guaranteed to be 100% secure due to the inherent risks of data transmission over the Internet. Consequently, we cannot ensure or warrant the security of any information you transmit to us, and you understand that any information that you transfer to us is done at your own risk. If we learn of a security system breach, we may attempt to notify you, including electronically, so that you can take appropriate protective steps. By using the Sites or providing personal information to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of the Sites. We may post a notice via our Sites if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. If you have any questions about the security of your personal information, you can contact us via the contact information below.

Data Retention

We may retain your information for as long as needed to provide you with the Sites, understand and serve our members, comply with our legal obligations, resolve disputes, and enforce our agreements. In certain circumstances, we may be required by law to retain your personal information, or may need to retain your personal information in order to continue providing access to the Sites.

Data Transfers

The Sites are hosted in the United States. In order to communicate with you about content, the information that we collect from you may be transferred to, stored, used, and processed by HDA in the United States or one of our service providers based in the United States or outside of the United States. Such entities may be engaged in, among other things: (i) assisting us in providing the Sites to you, and (ii) the provision of support services.

If you are visiting from the European Union or other regions with laws governing information collection and use that may differ from United States law, please note that you are transferring your personal information to the United States. The laws of some countries may not provide the same levels of protection of personal information as your home country, particularly if you are a resident in the European Union. By using the Sites, you agree to the collection, transfer, storage, use and processing of information about you for the purposes described in this Privacy Policy. When you provide personal information to us or our service providers or vendors, you consent to the processing of your information in the United States as the Sites are operated in the United States. We will take reasonable steps to ensure that information about you is treated securely in accordance with this Privacy Policy, and that all information you provide to us is stored on our secure servers or those of our service providers.

YOU ACKNOWLEDGE THAT THE LAWS OF THE UNITED STATES TREAT YOUR INFORMATION IN A MANNER THAT MAY BE SUBSTANTIALLY DIFFERENT FROM, AND LESS PROTECTIVE THAN, THE TREATMENT REQUIRED UNDER THE LAWS OF OTHER COUNTRIES AND JURISDICTIONS. IF YOU DO NOT WANT YOUR INFORMATION TRANSFERRED TO THE UNITED STATES, YOU SHOULD NOT SHARE YOUR PERSONAL INFORMATION WITH US, OR MAKE USE OF THE SITES.

Policy Regarding Children's Personal Information

The Sites are not directed to children under the age of 18. We do not knowingly collect personal information from children under 18. If you are under 18, please do not use the Sites and do not provide any personal information to us. If you become aware that a child under 18 has provided us with personal information without your consent, please contact us at membership@hda.org. Visit www.OnGuardOnline.gov for tips from the Federal Trade Commission on protecting children's privacy online.

Opting Out of Certain Email Communications

At any time, you can add or remove your name from a HDA list by contacting us at membership@hda.org. We will endeavor to comply with your request as soon as reasonably practicable. In certain circumstances, we may be required by law to retain your personal information,

or may need to retain your personal information in order to continue providing the Sites. You may not opt-out of transactional or relationship communications, which are not promotional in nature.

You may sign-up to receive certain promotional communications from us. If you would like to discontinue receiving this promotional information, you may update your email preferences by using the “Unsubscribe” link found in promotional emails we send to you or by contacting us as membership@hda.org.

Browser “Do Not Track” Signals

Some browsers offer a “do not track” (“DNT”) option. Because no common industry or legal standard for DNT has been adopted by industry groups, technology companies, or regulators, we do not respond to DNT signals. We will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

California Shine the Light Law

A California privacy law that went into effect on January 1, 2005, the “Shine the Light” law, allows California residents to obtain a list of third parties to whom a business has disclosed personal information if it shares such information with third parties for their direct marketing purposes. We do not share personal information with third parties for their direct marketing purposes.

Nevada Disclosure

Residents of Nevada have the right to opt out of the sale of certain personal information to third parties. We currently do not sell your personal information as defined by Nevada law.

Privacy Rights for the European Economic Area, the United Kingdom, and Switzerland

We may process personal data as that term is defined in the European Union’s General Data Protection Regulation (“GDPR”) and the equivalent UK law. If you are located in the EEA, U.K., or Switzerland, you have the following rights:

- You have the right to access information about the categories of personal data we have collected about you. You may also request a copy of the personal data we have collected, and upon request, we will provide this data to you in electronic form or transfer it to a third party.
- You have the right to correct your personal data if inaccurate.
- You have the right to request erasure of your personal data when such data is no longer necessary for the purposes for which it was collected, when you withdraw consent and no other legal basis for processing exists, or when you believe that your fundamental rights to data privacy and protection outweigh our legitimate interest in continuing the processing.
- You have the right to restrict our processing of personal data if there is a dispute about the accuracy of the data; if the processing is unlawful; if the processing is no longer necessary for the purposes for which it was collected but is needed by you for the establishment, exercise or defense of legal claims; or if your request to object to processing is pending evaluation.
- You have the right to object to processing of your personal data based on our legitimate interests or for direct marketing (including profiling). We will no longer process the data

unless there are compelling legitimate grounds for our processing that override your interests, rights, and freedoms, or for the purpose of asserting, exercising, or defending legal claims.

- When we process your information on the basis that you have consented to such processing, you have the right to withdraw your consent, or ask us to stop or restrict processing the personal information we have about you.
- You may also ask us to transfer your personal information to a third party under certain circumstances.

In processing personal data, we may rely upon the following lawful bases:

- **Consent.** We may process personal data with the consent of the individual whose data is being processed and/or in reliance upon the consent of the administrator of the account, who must affirm that s/he has obtained appropriate consent from all participants. This includes when we offer our Sites to you which you have requested, or other feature of our Sites that you have elected to take part in.
- **Contract.** When we enter a contract with you and/or an administrator for your account, we process personal data on the basis of our contract in order to prepare and enter into the contract, as well as to perform and manage our contract. This is necessary for us to provide the Sites to you.
- **Vital interests.** In a case where the personal data is required to protect your vital interests or the vital interests of another natural person, then this may be used as the lawful basis of the processing. For example, we may need to process personal data in the event of a pandemic.
- **As required by law.** We may process personal data as required to comply with legal obligations to which we are subject for the purpose of compliance with EEA, UK, or Swiss public, governmental, judicial, or other regulatory authorities. This could include where we are legally required to disclose your information to third parties.
- **For legitimate business purposes.** This includes, but is not limited to, legal compliance and the purposes described above. This may also include where we use your personal data to understand your usage of our Sites, improve the content of our services, and improve the user experience generally.

Users who are located in the European Economic Area (“EEA”), the European Union, the U.K., or Switzerland have the right to lodge a complaint about our data collection and processing actions with the relevant supervisory authority in their country of residence. Contact details for data protection authorities are available here: https://edpb.europa.eu/about-edpb/about-edpb/members_en. If you would like to exercise any of these rights, please contact us at the information provided below.

Changes to This Privacy Policy

We may need to update this Privacy Policy from time to time, and we reserve the right to do so as we deem necessary or desirable. We will notify you of such changes by revising the “Effective Date” provided herein, and/or by any other legal means, and your use of the Sites after any such changes shall constitute your consent to such changes. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact Information

If you have questions or concerns about our Privacy Policy or our privacy practices, please contact us at:

By Email: membership@hda.org

By Phone: (202) 963-1200

By Mail: 1275 Pennsylvania Avenue NW, Suite 600, Washington, DC 20004