

## Privacy Policy of ChicagoVeinInstitute.com

This Application collects some Personal Data from its Users.

### **POLICY SUMMARY**

#### **Personal Data collected for the following purposes and using the following services:**

##### Analytics

Google AdWords conversion tracking, Google Analytics and Google Tag Manager

Personal Data: Cookies and Usage data

##### Contacting the User

Contact form

Personal Data: address, company name, country, email address, first name, last name, phone number, province, state and ZIP/Postal code

##### Phone contact

Personal Data: phone number

##### Mailing List or Newsletter

Personal Data: email address, first name, last name and Usage data

##### Hosting and backend infrastructure

##### Heroku and Amazon Web Services

Personal Data: various types of Data as specified in the privacy policy of the service

##### Infrastructure monitoring

##### New Relic

Personal Data: various types of Data as specified in the privacy policy of the service

##### Interaction with external social networks and platforms

Facebook Like button and social widgets and Google+ +1 button and social widgets

Personal Data: Cookies and Usage data

##### Location-based interactions

##### Geolocation

Personal Data: geographic position

##### Managing contacts and sending messages

## MailChimp

Personal Data: email address

## Mandrill

Personal Data: email address and Usage data

## Registration and authentication

### Direct registration

Personal Data: address, city, company name, country, email address, first name, last name, password, phone number, province, state and ZIP/Postal code

## Remarketing and Behavioral Targeting

### Remarketing through Google Analytics for Display Advertising and AdWords Remarketing

Personal Data: Cookies and Usage data

## Contact information

### Data owner

Chicago Vein Institute, 2333 W. Irving Park Road, Chicago, IL 60618, USA  
Info@ChicagoVeinInstitute.com

## FULL POLICY

### Data Controller and Owner

Chicago Vein Institute, 2333 W. Irving Park Road, Chicago, IL 60618, USA  
Info@ChicagoVeinInstitute.com

### Types of Data collected

Among the types of Personal Data that this Application collects, by itself or through third parties, there are: Cookies, Usage data, first name, last name, phone number, company name, address, country, state, province, email address, ZIP/Postal code, geographic position, password and city. Other Personal Data collected may be described in other sections of this privacy policy or by dedicated explanation text contextually with the Data collection.

The Personal Data may be freely provided by the User, or collected automatically when using this Application.

Any use of Cookies - or of other tracking tools - by this Application or by the owners of third party services used by this Application, unless stated otherwise, serves to identify Users and remember their preferences, for the sole purpose of providing the service required by the User.

Failure to provide certain Personal Data may make it impossible for this Application to provide its services.

Users are responsible for any Personal Data of third parties obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

## **Mode and place of processing the Data**

### **Methods of processing**

The Data Controller processes the Data of Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and modes strictly related to the purposes indicated. In addition to the Data Controller, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, sales, marketing, legal, system administration) or external parties (such as third party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by the Owner. The updated list of these parties may be requested from the Data Controller at any time.

### **Place**

The Data is processed at the Data Controller's operating offices and in any other places where the parties involved with the processing are located. For further information, please contact the Data Controller.

### **Retention time**

The Data is kept for the time necessary to provide the service requested by the User, or stated by the purposes outlined in this document, and the User can always request that the Data Controller suspend or remove the data.

## **The use of the collected Data**

The Data concerning the User is collected to allow the Owner to provide its services, as well as for the following purposes: Analytics, Remarketing and Behavioral Targeting, Interaction with external social networks and platforms, Contacting the User, Hosting and backend infrastructure, Managing contacts and sending messages, Location-based interactions, Registration and authentication and Infrastructure monitoring.

The Personal Data used for each purpose is outlined in the specific sections of this document.

## **Detailed information on the processing of Personal Data**

Personal Data is collected for the following purposes and using the following services:

### **Analytics**

The services contained in this section enable the Owner to monitor and analyze web traffic and can be used to keep track of User behavior.

Google AdWords conversion tracking (Google Inc.)

Google AdWords conversion tracking is an analytics service provided by Google Inc. that connects data from the Google AdWords advertising network with actions performed on this Application.

Personal Data collected: Cookies and Usage data.

Place of processing: US – Privacy Policy

Google Analytics (Google Inc.)

Google Analytics is a web analysis service provided by Google Inc. (“Google”). Google utilizes the Data collected to track and examine the use of this Application, to prepare reports on its activities and share them with other Google services.

Google may use the Data collected to contextualize and personalize the ads of its own advertising network.

Personal Data collected: Cookies and Usage data.

Place of processing: US – Privacy Policy – Opt Out

Google Tag Manager (Google)

Google Tag Manager is an analytics service provided by Google, Inc.

Personal Data collected: Cookies and Usage data.

Place of processing: US – Privacy Policy

### **Contacting the User**

Contact form (This Application)

By filling in the contact form with their Data, the User authorizes this Application to use these details to reply to requests for information, quotes or any other kind of request as indicated by the form’s header.

Personal Data collected: address, company name, country, email address, first name, last name, phone number, province, state and ZIP/Postal code.

Phone contact (This Application)

Users that provided their phone number might be contacted for commercial or promotional purposes related to this Application, as well as for fulfilling support requests.

Personal Data collected: phone number.

Mailing List or Newsletter (This Application)

By registering on the mailing list or for the newsletter, the User’s email address will be added to the contact list of those who may receive email messages containing information of commercial or promotional nature concerning this Application. Your email address might also be added to this list as a result of signing up to this Application or after making a purchase.

Personal Data collected: email address, first name, last name and Usage data.

### **Hosting and backend infrastructure**

This type of services has the purpose of hosting data and files that enable this Application to run and be distributed as well as to provide a ready-made infrastructure to run specific features or parts of this Application. Some of these services work through geographically distributed servers, making it difficult to determine the actual location where the Personal Data are stored.

Heroku (Heroku, Inc.)

Heroku is a hosting service provided by Heroku, Inc.

Personal Data collected: various types of Data as specified in the privacy policy of the service. Place of processing: US – Privacy Policy

Amazon Web Services (Amazon)

Amazon Web Services is a hosting service provided by Amazon.com Inc.

Personal Data collected: various types of Data as specified in the privacy policy of the service. Privacy Policy

### **Infrastructure monitoring**

This type of services allows this Application to monitor the use and behavior of its components so its performance, operation, maintenance and troubleshooting can be improved.

Which Personal Data are processed depends on the characteristics and mode of implementation of these services, whose function is to filter the activities of this Application.

New Relic (New Relic)

New Relic is a monitoring service provided by New Relic Inc.

The way New Relic is integrated means that it filters all traffic of this Application, i.e., communication between the Application and the User's browser or device, while also allowing analytical data on this Application to be collected.

Personal Data collected: various types of Data as specified in the privacy policy of the service. Place of processing: US – Privacy Policy

### **Interaction with external social networks and platforms**

This type of services allow interaction with social networks or other external platforms directly from the pages of this Application.

The interaction and information obtained through this Application are always subject to the User's privacy settings for each social network.

This type of service might still collect traffic data for the pages where the service is installed, even when Users do not use it.

Facebook Like button and social widgets (Facebook, Inc.)

The Facebook Like button and social widgets are services allowing interaction with the Facebook social network provided by Facebook, Inc.

Personal Data collected: Cookies and Usage data.

Place of processing: US – Privacy Policy

Google+ +1 button and social widgets (Google Inc.)

The Google+ +1 button and social widgets are services allowing interaction with the Google+ social network provided by Google Inc.

Personal Data collected: Cookies and Usage data.

Place of processing: US – Privacy Policy

### **Location-based interactions**

Geolocation (This Application)

This Application may collect, use, and share User location Data in order to provide location-based services.

Most browsers and devices provide tools to opt out from this feature by default. If explicit authorization has been provided, the User's location data may be tracked by this Application. Personal Data collected: geographic position.

### **Managing contacts and sending messages**

This type of services makes it possible to manage a database of email contacts, phone contacts or any other contact information to communicate with the User.

These services may also collect data concerning the date and time when the message was viewed by the User, as well as when the User interacted with it, such as by clicking on links included in the message.

MailChimp (The Rocket Science Group, LLC.)

MailChimp is an email address management and message sending service provided by The Rocket Science Group, LLC.

Personal Data collected: email address.

Place of processing: US – Privacy Policy

Mandrill (The Rocket Science Group, LLC.)

Mandrill is an email address management and message sending service provided by The Rocket Science Group, LLC.

Personal Data collected: email address and Usage data.

Place of processing: US – Privacy Policy

### **Registration and authentication**

By registering or authenticating, Users allow this Application to identify them and give them access to dedicated services.

Depending on what is described below, third parties may provide registration and authentication services. In this case, this Application will be able to access some Data, stored by these third party services, for registration or identification purposes.

Direct registration (This Application)

The User registers by filling out the registration form and providing the Personal Data directly to this Application.

Personal Data collected: address, city, company name, country, email address, first name, last name, password, phone number, province, state and ZIP/Postal code.

### **Remarketing and Behavioral Targeting**

This type of services allows this Application and its partners to inform, optimize and serve advertising based on past use of this Application by the User.

This activity is performed by tracking Usage Data and by using Cookies, information that is transferred to the partners that manage the remarketing and behavioral targeting activity. Remarketing through Google Analytics for Display Advertising (Google Inc.)

Google Analytics for Display Advertising is a Remarketing and Behavioral Targeting service provided by Google Inc. that connects the tracking activity performed by Google Analytics and its Cookies with the Adwords advertising network and the Doubleclick Cookie.

Personal Data collected: Cookies and Usage data.

Place of processing: US – Privacy Policy – Opt Out

AdWords Remarketing (Google Inc.)

AdWords Remarketing is a Remarketing and Behavioral Targeting service provided by Google Inc. that connects the activity of this Application with the Adwords advertising network and the Doubleclick Cookie.

Personal Data collected: Cookies and Usage data.

Place of processing: US – Privacy Policy – Opt Out

## **Information about Cookies**

### **Strictly necessary Cookies**

These Cookies are necessary for the proper functioning of this Application and are used to store sessions and preferences.

guest\_token

Used to store preferences of the Application.

\_jamestown\_session, request\_method

Used to store the User session and keep the User logged in.

### **Analytics**

These Cookies are necessary for the functioning of the services filed under the section "Analytics". \_ut\*, \_ga\*

Google Analytics Cookies.

### **Infrastructure monitoring**

These Cookies are necessary for the functioning of the services filed under the section "Infrastructure monitoring".

JSESSIONID

New Relic Cookies.

Since the installation of third party Cookies and other tracking systems through the services used within this Application can not be technically controlled by the Owner, any specific references to Cookies and tracking systems installed by third parties are to be considered indicative. In order to obtain complete information, consult the privacy policy for the respective third party services listed in this document.

## **Additional information about Data collection and processing**

### **Legal action**

The User's Personal Data may be used for legal purposes by the Data Controller, in Court or in the stages leading to possible legal action arising from improper use of this Application or the related services.

The User declares to be aware that the Data Controller may be required to reveal personal data upon request of public authorities.

### **Additional information about User's Personal Data**

In addition to the information contained in this privacy policy, this Application may provide the User with additional and contextual information concerning particular services or the collection and processing of Personal Data upon request.

### **System logs and maintenance**

For operation and maintenance purposes, this Application and any third party services may collect files that record interaction with this Application (System logs) or use for this purpose other Personal Data (such as IP Address).

### **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Data Controller at any time. Please see the contact information at the beginning of this document.

### **The rights of Users**

Users have the right, at any time, to know whether their Personal Data has been stored and can consult the Data Controller to learn about their contents and origin, to verify their accuracy or to ask for them to be supplemented, cancelled, updated or corrected, or for their transformation into anonymous format or to block any data held in violation of the law, as well as to oppose their

treatment for any and all legitimate reasons. Requests should be sent to the Data Controller at the contact information set out above.

This Application does not support “Do Not Track” requests.

To determine whether any of the third party services it uses honor the “Do Not Track” requests, please read their privacy policies.

### **Changes to this privacy policy**

The Data Controller reserves the right to make changes to this privacy policy at any time by giving notice to its Users on this page. It is strongly recommended to check this page often, referring to the date of the last modification listed at the bottom. If a User objects to any of the changes to the Policy, the User must cease using this Application and can request that the Data Controller remove the Personal Data. Unless stated otherwise, the then-current privacy policy applies to all Personal Data the Data Controller has about Users.

### **Information about this privacy policy**

The Data Controller is responsible for this privacy policy, prepared starting from the modules provided by lubenda and hosted on lubenda's servers.

### **Definitions and legal references**

#### **Personal Data (or Data)**

Any information regarding a natural person, a legal person, an institution or an association, which is, or can be, identified, even indirectly, by reference to any other information, including a personal identification number.

#### **Usage Data**

Information collected automatically from this Application (or third party services employed in this Application), which can include: the IP addresses or domain names of the computers utilized by the Users who use this Application, the URI addresses (Uniform Resource Identifier), the time of the request, the method utilized to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's answer (successful outcome, error, etc.), the country of origin, the features of the browser and the operating system utilized by the User, the various time details per visit (e.g., the time spent on each page within the Application) and the details about the path followed within the Application with special reference to the sequence of pages visited, and other parameters about the device operating system and/or the User's IT environment.

#### **User**

The individual using this Application, which must coincide with or be authorized by the Data Subject, to whom the Personal Data refers.

#### **Data Subject**

The legal or natural person to whom the Personal Data refers.

#### **Data Processor (or Data Supervisor)**

The natural person, legal person, public administration or any other body, association or organization authorized by the Data Controller to process the Personal Data in compliance with this privacy policy.

#### **Data Controller (or Owner)**

The natural person, legal person, public administration or any other body, association or organization with the right, also jointly with another Data Controller, to make decisions regarding the purposes,

and the methods of processing of Personal Data and the means used, including the security measures concerning the operation and use of this Application. The Data Controller, unless otherwise specified, is the Owner of this Application.

This Application

The hardware or software tool by which the Personal Data of the User is collected. Cookies  
Small piece of data stored in the User's device.

---

Legal information

Notice to European Users: this privacy statement has been prepared in fulfillment of the obligations under Art. **10** of EC Directive n. **95/46/EC**, and under the provisions of Directive **2002/58/EC**, as revised by Directive **2009/136/EC**, on the subject of Cookies.

This privacy policy relates solely to this Application.