



Privacy Policy

Introduction

This Notice describes Eye Consultants of Pennsylvania, PC, (Eye Consultants of Pennsylvania) privacy practices for information collected on this website. This Notice also applies to Eye Consultants of Pennsylvania's affiliates' websites that link to this Notice. For simplicity, both Eye Consultants of Pennsylvania and any affiliate websites are simply referred to as "the website" in this Notice.

Eye Consultants of Pennsylvania supports the right to privacy, including the rights of individuals to control the dissemination and use of personal data that describes them. Eye Consultants of Pennsylvania is committed to protecting personal data of the users of our website and utilizes technical and organization measures to protect your data. Eye Consultants of Pennsylvania supports and complies with domestic and international laws and regulations that seek to protect the privacy rights of such individuals.

This website is owned and operated by Eye Consultants of Pennsylvania, PC, with principal business offices at One Granite Point, Wyomissing, PA 19610 USA. Other websites subject to this Notice may be owned and operated by an affiliate company which is under the control of Eye Consultants of Pennsylvania. From a data privacy perspective, this means that Eye Consultants of Pennsylvania is data controller and data collector. Eye Consultants of Pennsylvania's Data Protection Officer can be reached at compliance@ecop.us or by mail at:

Eye Consultants of Pennsylvania, PC
Data Privacy Officer
One Granite Point
Wyomissing, PA 19610

Data Collection

When visiting our website, you are not required to provide any personal data, including Protected Health Information. Eye Consultants of Pennsylvania relies on consent or other lawful principles established for data collection under applicable laws. Therefore, you have the option to abstain from providing personal data when visiting publicly available portions of the website. However, when registering for an event, subscribing to receive Eye Consultants of Pennsylvania's

marketing or educational materials or when purchasing or using Eye Consultants of Pennsylvania's products or services or in other circumstances, you may be required to provide some or all of the personal data listed below. If you have provided Eye Consultants of Pennsylvania with your personal data, you have the rights described below in the Data Subject Rights section below.

Eye Consultants of Pennsylvania collects additional non-personal data as described in the subsequent section of this Notice (Additional Data Collection Activities).

Any data collected may be used in Eye Consultants of Pennsylvania's business to provide you the products we offer and to aid in Eye Consultants of Pennsylvania's sales and marketing efforts and may result in you being contacted by Eye Consultants of Pennsylvania. In some cases, contact information may be required for Eye Consultants of Pennsylvania to create an account, enable delivery of materials requested on the website or to otherwise communicate with you. This may include: providing product or other requested information, making responses to inquiries, registration for Eye Consultants of Pennsylvania events, and distributions for marketing purposes. You may also be able to register for Eye Consultants of Pennsylvania services through the website.

For the purposes mentioned above, Eye Consultants of Pennsylvania may collect the following personal data about you:

- Full name
- Address
- Mailing Address
- Telephone number
- Email address

To facilitate its sales and marketing efforts, Eye Consultants of Pennsylvania may combine the personal data you provide with information that is not collected directly from you. Data not provided directly by you may be supplied by Eye Consultants of Pennsylvania's vendors that support its sales and marketing efforts. Eye Consultants of Pennsylvania uses automated processing within its internal systems to optimize its sales and marketing activities. You may lodge a complaint with Eye Consultants of Pennsylvania regarding automated processing by submitting it to Eye Consultants of Pennsylvania using the contact information provided in the introduction to this policy.

We will retain your personal information as needed to fulfill the purposes for which it was collected. Personal data collected under this Notice is retained as long as you continue to interact with Eye Consultants of Pennsylvania's Sales and Marketing Teams, or we have a legitimate business interest to retain your data.

Additional Data Collection Activities (Automatic Information)

Eye Consultants of Pennsylvania automatically receives and records information about the use of the website either directly or through third party tracking utility providers. This may include cookies, IP addresses, your browser type, operating system version, language settings, which locally installed Eye Consultants of Pennsylvania applications you use (if any) and how you use them, the web page you were visiting immediately prior to visiting our website, pages of our website that you visited, the time spent on those pages, information you searched for on our website, access times and dates, and other statistics. This data is not combined with your personal data collected directly from you.

Eye Consultants of Pennsylvania utilizes cookies on its website. Eye Consultants of Pennsylvania uses IP addresses to help diagnose problems and to administer the Eye Consultants of Pennsylvania website. When you visit our Website, we recognize only your domain name and not your e-mail address. We will see your e-mail address only if you provide it or send us an e-mail message. Eye Consultants of Pennsylvania does not ask you for, access or track any location-based information from your device. If Eye Consultants of Pennsylvania wishes to do so in the future to enhance our website, Eye Consultants of Pennsylvania will specifically ask your permission.

The collection of personal data is not required for accessing this website; however, Eye Consultants of Pennsylvania collects the additional data for the maintenance and optimization of its website.

Data Processing

Eye Consultants of Pennsylvania utilizes vendors to support the operation of Eye Consultants of Pennsylvania's business and for sales and marketing that may receive the data collected under this notice, and these vendors are data processors. However, any such processing is limited to facilitating Eye Consultants of Pennsylvania's own activities. Eye Consultants of Pennsylvania does not share, sell or rent your personal information to any third parties for their promotional purposes.

Additionally, data processors utilized by Eye Consultants of Pennsylvania are subjected to Eye Consultants of Pennsylvania's due diligence process and required to make contractual assurances that they will take adequate precautions to protect your data. Eye Consultants of Pennsylvania will require such service providers to adopt adequate technical and organizational security measures to ensure the processing of personal data only as instructed by Eye Consultants of Pennsylvania and for no other purposes.

Additional Transfers

Eye Consultants of Pennsylvania may share personal information with its affiliates and with vendors working on our behalf as necessary to complete your requests and to provide you Eye Consultants of Pennsylvania products and services. We may also share data when required by law or to respond to legal process. Eye Consultants of Pennsylvania, its affiliates, and/or the vendors may be located in countries that are not considered to provide an adequate level of data protection as established by the European

Data Protection Directive (95/46/EG) or the General Data Protection Regulation ((EU) 2016/679) (GDPR), including the United States. Where required under applicable law, Eye Consultants of Pennsylvania will implement appropriate measures to secure the data transfers in accordance with applicable data protection laws. Such measure may include use of the Model Clauses or the Privacy Shield Framework.

Eye Consultants of Pennsylvania has responsibility for the processing of personal information it receives under the Privacy Shield and subsequently transfers to a third party acting as an agent on its behalf. Eye Consultants of Pennsylvania remains liable under the Privacy Shield Principles if an agent processes personal data covered by this Notice in a manner inconsistent with the principles, except where Eye Consultants of Pennsylvania is not responsible for the event giving rise to the damage.

In certain situations, Eye Consultants of Pennsylvania may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

Notice of Privacy Practices regarding Protected Health Information

With regard to your Protected Health Information, our *Notice of Privacy Practices* supersedes anything to the contrary contained in this Privacy Policy. To review our *Notice of Privacy Practices* regarding Protected Health Information, click here. [LINK: Notice of Privacy Practices] You can download a PDF version of our *Notice of Privacy Practices* here. [DOWNLOAD].

Privacy Shield

Eye Consultants of Pennsylvania complies with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union or Switzerland to the United States. Eye Consultants of Pennsylvania has certified to the U.S. Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this Notice and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit the U.S. Department of Commerce's Privacy Shield site.

The U.S. Federal Trade Commission has jurisdiction over Eye Consultants of Pennsylvania's compliance with the Privacy Shield.

Rights you may have under Privacy Shield or applicable regulation, such as the General Data Protection Regulation (GDPR), are described below.

Data Subject Rights

Everyone

You may request from Eye Consultants of Pennsylvania access to, correction of, blocking of and/or deletion of your personal data in line with applicable data protection law. You may also withdraw your consent for Eye Consultants of Pennsylvania to process your personal data.

Privacy Shield

In compliance with the Privacy Shield Principles, Eye Consultants of Pennsylvania commits to resolve complaints about our collection or use of your personal information. European Union residents with inquiries or complaints regarding our Privacy Shield policy should direct any such request and any other questions you may have with regard to the Privacy Shield Principles to Eye Consultants of Pennsylvania's Data Protection Officer, whose contact information is listed in the introduction to this Notice.

Eye Consultants of Pennsylvania commits to cooperate with the panel established by the EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner, as applicable, and comply with the advice given by the panel and Commissioner, as applicable, with regard to human resources data transferred from the EU or Switzerland, as applicable, in the context of the employment relationship.

Eye Consultants of Pennsylvania has further committed to refer unresolved Privacy Shield complaints to JAMS, an alternative dispute resolution provider located in the United States, with a global presence. If you do not receive timely acknowledgment of your complaint from us, or if we have not resolved your complaint, please contact or visit JAMS for more information or to file a complaint. The services of JAMS are provided at no cost to you.

Under certain circumstances you may invoke binding arbitration for complaints regarding Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms. For more information please visit the U.S. Department of Commerce's Privacy Shield Site.

GDPR

Data Subjects covered by the GDPR are afforded additional rights including:

- The Right to be Forgotten: you have the right to request the erasure of the personal data submitted to Eye Consultants of Pennsylvania; this means you can request Eye Consultants of Pennsylvania restrict your data from any further processing, and have your data deleted if possible.
- Complaints may also be submitted to the applicable supervisory authority in the European Economic Area, which includes the data protection authority in your locality (for example, in the U.K., the supervisory authority would be the Information Commissioner's Office).

Children's Privacy

Eye Consultants of Pennsylvania encourages parents and guardians to take an active role in their children's online activities. Our Services are not aimed at people under 18 and Eye Consultants of Pennsylvania does not knowingly collect personal information from children without appropriate parental or guardian consent. If you believe that we may have collected personal information from someone under the age of 13 (or the applicable age of consent) without proper consent, please let us know using the methods described in this Notice.

Eye Consultants of Pennsylvania Patients and Customers

Eye Consultants of Pennsylvania may also collect personal data from patients and customers as required to provide support and delivery of Eye Consultants of Pennsylvania products and services.

With regard to your Protected Health Information, our *Notice of Privacy Practices* supersedes anything to the contrary contained in this Privacy Policy. To review our *Notice of Privacy Practices* regarding Protected Health Information, visit www.eyeconsultantsofpa.com.

A patient's or customer's use of Eye Consultants of Pennsylvania's or an affiliate's products and services is governed by the terms of the contract between Eye Consultants of Pennsylvania or an affiliate and the customer.

Updates to this Privacy Notice

Eye Consultants of Pennsylvania may update this Privacy Notice from time to time. If we modify this Privacy Notice, we will post the revised version here. We may also provide notification of material changes by other means such as posting a notice on our website.

Revised: January 1, 2019

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