Minnesota Center for
Multiple Sclerosis

PRIVACY POLICY NOTICE

This Privacy Policy Notice applies to mncenterforms.com, the website of Minnesota Center for Multiple Sclerosis (MCMS), to inform those who are concerned with how their personally identifiable information (PII) is being used online. PII is data that can be used on its own or with other information to identify, contact, or locate a single person. It can also be used to identify an individual in context. Please read this Privacy Policy Notice carefully to learn how we collect, use, protect, or otherwise handle your PII on our website.

Please note, the MCMS Notice of Privacy Practices is a separate document that governs how protected health information (PHI) about you may be used and disclosed by MCMS. Once you become our patient, information you share with us is also protected under that Notice.

This Privacy Policy Notice applies solely to information collected by this website. It will notify you of the following:

1. What personally identifiable information is collected from you through the website, how it is used and with whom it may be shared.
2. What choices are available to you regarding the use of your data.
3. The security procedures in place to protect the misuse of your information.
4. How you can correct any inaccuracies in the information.

Information Collection, Use, and Sharing

We are the sole owners of the information collected on this site. We only collect personal information that you choose to give us, through a form on this website, by email, or by another direct contact from you, plus the limited technical information described under “Cookies” and “Outside Services” below. **We do not sell or rent your information to anyone.**

We will use your information to respond to you regarding the reason you contacted us. We will not share your information with any third party outside of our organization, other than service providers who help us run this website or respond to you, and only as necessary to fulfill your request.

Unless you ask us not to, we may contact you by email or phone in the future about the reason you contacted us.

> Please do not include detailed medical information in a website form or email. If your question is about your health or your care, please call our office.

Your Access to and Control Over Information

You may opt out of any future contacts from us at any time. You can do the following at any time by contacting us using the details at the end of this notice:

- See what data we have about you, if any.
- Change/correct any data we have about you.
- Have us delete any data we have about you, unless we are required by law to keep it.
- Express any concern you have about our use of your data.

If you are our patient, your rights over your health records (such as to see or get a copy of them, or ask us to correct them) are explained in our Notice of Privacy Practices.

What personal data do we collect, and why?

Information you give us. You may choose to enter information in the forms on this website. Each form collects only what we need to respond to you:

Form	What it asks for
Appointment request form	Name, email, phone, the treatment you are interested in, preferred provider and dates, your note and your contact preferences
Contact form	Name, email, the service you are asking about, your note and your contact preferences
Clinical study interest forms	Name, address, email, phone, contact preferences, your note and your consent choices

Information from these forms is sent to our website and to our staff so we can respond. It is not sent to advertising companies or social media platforms.

Information collected automatically. Like most websites, our web server and the outside services listed below receive basic technical information when you visit, such as your IP address, browser type, and the address of the page you are viewing. We use this to keep the site working and secure and, through our analytics provider, to understand in summary form how the site is used.

What we do not do. This website does not use advertising, remarketing or retargeting tags, social media tracking pixels, or session-recording tools, and we do not share information about your visit with advertising companies or social media platforms.

If you arrive from an online ad. When you reach our site by clicking an online ad, the page address may include a code that identifies that ad. That code is passed, as part of the page address, to the services that receive page addresses (listed below). We do not use advertising tracking tags, and the code is not sent to advertising companies by our website.

Cookies

Cookies are small files that a site or its service provider places in your web browser so the site can recognize your browser and remember certain information. Websites can also store small amounts of information in your browser in other ways ("browser storage"). This website sets the following:

Name	Set by	Purpose	How long it lasts
_ghost_id	Ghost Metrics (our website analytics provider)	Tells our analytics apart from one visit to the next so we can count returning visitors	About 13 months
_ghost_ses	Ghost Metrics	Groups the pages viewed in a single visit	30 minutes
_ghost_ref	Ghost Metrics	Records the website or online ad campaign you came from, if any	Not confirmed; set only when you arrive from another website or a campaign link
visits	This website	Site function; counts visits within a day	1 day
UserWay settings (stored in your browser, not a cookie)	UserWay (our accessibility provider)	Remembers accessibility choices you make, such as text size or contrast, and holds a random ID for your browser that is sent to UserWay	Until you clear your browser data

We do not use advertising cookies. **Your choices:** you can block or delete cookies and browser storage at any time in your browser's settings (usually under "Privacy" or "Site data"). The website will still work if you do, although some settings, such as your accessibility preferences, may not be remembered.

Outside Services and Embedded Content

Our website uses a small number of outside services to work properly. Each receives only what it needs to do its job:

- **Ghost Metrics** – website analytics (see Analytics below).
- **UserWay** – the accessibility tool on our general information pages. It receives the address of the page you are viewing (including any campaign code in that address) so it can work on that page. It does not load on our form pages and does not receive what you type into our forms.

- **Google Fonts** – delivers the fonts the pages use. Google receives your IP address and the page request, as any website server would.

Spam protection. Our forms are protected from spam by hidden fields on our own website (a “honeypot”). No outside spam-checking service receives what you type into our forms.

Links to other websites. If you follow a link from our site to a website run by another organization, that website has its own privacy policy, and we encourage you to read it before entering information.

Analytics

We use Ghost Metrics, a website analytics service, to understand in summary form how visitors use our site, for example which pages are viewed most often, so we can improve it. Ghost Metrics receives the address and title of the pages you view, basic technical information about your visit, and how our forms are used (for example, which fields are filled in and how long that takes, but not what you type). If you arrive from an online ad or campaign link, Ghost Metrics also receives the campaign name and may record it with the later pages you view. Ghost Metrics provides this service under a business associate agreement with us. We use Ghost Metrics’ reports only to understand overall use of our website, not for advertising. We do not use Google Analytics or any advertising analytics on this website. You can stop analytics from recognizing you across visits by blocking or deleting cookies in your browser.

What do we do with your data?

Do we share your data?

We do not sell, rent, or trade your PII. We share it only with service providers who help us operate our website, conduct our business, or serve you, such as our website host and the services listed above. They may use it only to provide their services to us, and must keep it confidential. We regularly review the services on our websites and remove or limit any that are not needed.

We may also release information when the law requires it, or when needed to protect the rights, property, or safety of our patients, our staff, or others.

Where do we send your data?

Only to the places described in this notice. We follow the Fair Information Practice Principles: collecting only what we need, using it only for the reason it was given, keeping it accurate and secure, and being open about our practices.

Security

We take reasonable precautions to protect your information online and offline. Information sent between your browser and our website is encrypted over a secure (HTTPS) connection, which you can confirm by looking for “https” and the lock icon in your browser’s address bar. We do not collect payment card numbers through forms on this website.

Only employees who need the information to do a specific job (for example, scheduling or responding to your request) are granted access to it. We maintain administrative, physical, and technical safeguards designed to protect health information as required by HIPAA. No website or method of transmission is completely secure, so we cannot guarantee absolute security, which is one reason we ask you not to send detailed medical information through website forms.

Children’s Privacy

This website is not directed to children under 13, and we do not knowingly collect personal information from them through it. If you are a parent or guardian and believe your child has given us information through this website, please contact us and we will delete it.

Your State Privacy Rights

Depending on where you live, including Minnesota, you may have additional rights under state privacy laws, such as the right to know what personal information we have about you, to correct or delete it, and to opt out of its sale or use for targeted advertising. We do not sell personal information and we do not use it for targeted advertising. To make a request, contact us using the details below. We will not treat you differently for exercising your rights. Health information about our patients is protected under HIPAA and our Notice of Privacy Practices.

GDPR

The GDPR requires that personal data from the European Economic Area (EEA) receive special protection. While we do not target EEA residents, we understand that our website may be accessed by them. We will make all reasonable efforts to provide at least the same level of protection for personal data received from the EEA as described in this notice.

Data Breaches

If a breach involving your information ever occurs, we will notify you, and any government agencies as required, within the time frames set by applicable law, including the HIPAA Breach Notification Rule and state breach notification laws. We abide by the individual redress principle: you have enforceable rights, and you may contact us, or file a complaint with the U.S. Department of Health and Human Services Office for Civil Rights or your state attorney general, if you believe your privacy rights have been violated. We will not retaliate against you for filing a complaint.

Changes to this Privacy Policy

We may update this privacy policy from time to time, for example when we change the services our website uses. When we do, we will post the updated notice on this page and change the “Last updated” date below. If we make a significant change in how we use your personal information, we will post a notice on our website before the change takes effect.

Contact Information

If you have any questions or concerns about this privacy policy, the practices of this website, or your dealings with this site, or to make any of the requests described above, please contact our Privacy Officer: Francine Wachtmann, JD, CHC, by phone at 617.771.7722 or by email at fwachtmann@vivoinfusion.com.

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