NY RETINA PRIVACY POLICY

Your privacy is important to us. To better protect your privacy, NY Retina Ophthalmology PLLC (hereinafter referred to as "NY Retina" "we," or "us" provide this notice explaining our online information practices on www.nyretina.com and other websites or applications that may link to this Privacy Statement and the choices you can make about the way your personal data is collected, used, and disclosed.

1. The Personal Data We Collect

Personal data means any information relating to an identified or identifiable natural person ("Personal Data"). This notice applies to all Personal Data collected or submitted on our website. On some pages, you can order products, services, make requests, apply for membership, participate in surveys, or register for events, seminars, or conferences.

The types of Personal Data collected in this context directly from you may include your:

- Name
- Private and business addresses
- Private and business email addresses
- Private and business phone numbers
- Occupation
- Title
- Other contact information
- Gender
- Date of birth
- Credit/debit card information
- The nature of your inquiry or comment
- Business profile information for membership application
- Order history and purchase behavior
- Confirmation of attendance for events or meetings
- Certification verification requests
- Information in texts you entered in connection with exams and surveys
- Exam and survey result information
- Other types of feedback and information when needed to provide a product or service you requested

We may also collect your Personal Data from your use of our website. This information includes:

Web behavior using but not limited to internal cookies, third party cookies, and social plugins, that track on and between all NY Retina sites (browsing activity, document downloads, form submissions, and other behavior on NY Retina affiliated sites).

We may also collect your Personal Data from third parties, such as marketing providers. This information may include your:

- Name
- Personal and business address
- Personal and business email address
- Business phone number
- Company and/or educational institution

- Date of birth

2. How NY Retina Uses Your Personal Data

We process your Personal Data only on a sufficient legal basis according to the applicable data protection laws. The legal basis can be one of the following:

- To fulfill our contractual obligations towards you; this is the case, for instance, where we: conduct your exams and surveys and calculate the respective results; perform the member programs; manage the customer accounts;
- Your consent; this is the case, for instance, where we send direct marketing information by electronic communication to you; track your web behavior; give you access to benefits on third party websites;
- Legitimate interests; this is the case, for instance, where we send you direct marketing information by other means than electronic communication; or
- To comply with our legal obligations.

Where the processing is based on consent you may withdraw your consent at any time without affecting the lawfulness of the processing based on consent before its withdrawal. You can do so by contacting us using the contact details set forth below.

Except where your Personal Data are processed by us to comply with a statutory or contractual obligation, you are not obliged to provide Your Personal Data. However, if you refuse to provide your Personal Data, it may not be possible for us to provide you with the services available on our website.

We use the Personal Data you submit or otherwise provide about yourself on our website for the following purposes:

- To complete your request or order
- To respond to inquiries and to confirm orders or registrations
- To perform our services to you and to administer our contractual relationship with you, such as calculating and providing the results of exams and surveys, and performing the member programs
- To manage your accounts
- To provide you with updates and other information that we think may be of interest to you
- To perform statistical analyses
- To send you news, announcements, and other marketing and promotional communications

3. Disclosure of Personal Data

NY Retina discloses your Personal Data to other NY Retina entities and to third parties.

If you have not given your explicit consent to do so, we do not disclose the Personal Data you submit or otherwise provide about yourself on our website to any third parties besides other NY Retina entities, unless it is necessary to complete your request or order or it is necessary to provide a product or service to you which you have ordered. We will also disclose such Personal Data to third parties if it is necessary to protect our rights or property or if it is required or authorized by law.

We disclose your Personal Data to service providers for marketing automation, process automation, lead capture statistical analysis, research, affinity programs, training and exam delivery, and certification management and fulfillment. A full list of the service providers is available upon request.

We disclose your Personal Data to our business partners for promotion, marketing, and networking. A full list of our business partners is available upon request.

We also disclose your Personal Data to NY Retina affiliates for list purposes, e.g. administration. A full list of the affiliates is available upon request.

However, except as noted in this Privacy Statement, your Personal Data are not used for any other purposes and are not disclosed to any other third parties.

We use non-identifying and aggregate information to better design our website and to disclose to advertisers. For example, we may tell an advertiser that a certain number of individuals visited a certain area on our website, or that certain number of men and certain number of women filled out our registration form, but we would not disclose anything that could be used to identify those individuals, except as noted in this Privacy Statement.

4. International Data Transfer

NY Retina might disclose your Personal Data to entities in other countries as needed to conduct business. This means that the Personal Data may be sent to countries that are located outside the European Economic Area ("EEA") such as the US. We have put in place appropriate safeguards in accordance with the legal requirements to ensure compliance with EU data protection regulations. For more information about the safeguards which are put in place, please contact us at the contact information set forth below.

5. How We Secure Your Data

NY Retina takes reasonable administrative, technical, and physical precautions to protect your Personal Data from accidental or unlawful loss, misuse, unauthorized access, disclosure, alteration, destruction, and other unlawful forms of processing. Authorized individuals having access to your Personal Data must respect the confidentiality of your Personal Data.

Your Personal Data will be stored only for the time they are needed for the purposes they have been collected and processed for and deleted afterwards. For marketing purposes, we only retain your Personal Data for six months unless you have agreed otherwise.

6. Your Rights

Where the Regulation (EU) 2016/679 (General Data Protection Regulation) or similar legal requirements apply to the processing you may exercise the following rights: The right to access the Personal Data; the right to rectification; the right to erasure; the right to restriction of the processing, the right to objection of the processing and the right to data portability. If you wish to exercise your rights, please contact us by using the contact information set forth below.

You can also lodge a complaint with your competent data protection authority or privacy regulator.

7. Links

Our website may contain links to other websites. Please be aware that this Privacy Statement does not apply to such linked sites nor is NY Retina responsible for the content or privacy practices of such linked sites.

8. “Cookies”

Like most websites, NY Retina uses “cookies” for several legitimate purposes. These include remembering IDs and passwords, tracking user traffic patterns, and differentiating between repeat and new users. It is NY Retina’s policy that data generated by cookies will be used for internal purposes only and to improve our website and site-related services.

9. Amendments

NY Retina may amend this Privacy Statement from time to time. Any such amendments will be posted on our website.
We will inform you if we intend to further process your Personal Data for compatible purposes other than those for which your Personal Data originally have been collected for by providing you the required information on that processing. The information will be provided in advance to you to consider and potentially exercise your rights on that further processing. Prior information is further provided for changes that have a fundamental impact to the nature of the processing.

10. How to Contact Us

If you have any inquiries or complaints regarding this Privacy Statement, you may contact:

Office Manager

NY Retina

585 Broadway

Massapequa, NY

11758

Phone: 516-360-2020

Email: info@nyretina.com