

## The American Cancer Society Study Portal Privacy Policy

**Effective Date: September 17, 2023**

The American Cancer Society (ACS) Study Portal website (“Platform”) is a tool of the VOICES and Cancer Prevention Study-3 (CPS-3) Research Programs. VOICES and CPS-3 (the “Studies”) are research studies conducted and funded by the American Cancer Society. Manifold Inc. operates the Platform as a service provider for ACS. Manifold and/or ACS (“we”) may collect certain Personal Information (defined below) from you through the Platform that will be processed in accordance with the Consent to be a Research Participant/ HIPAA Authorization (“Study Consent”). In the event of a conflict between the terms of this Privacy Policy (“Policy”) and the Study Consent with respect to Personal Information collected when you participate in the Studies, the terms of the Study Consent will control to the extent of the conflict. Manifold will process your Personal Information collected through the Platform only in accordance with a legal contract with ACS that restricts the use and disclosure of Personal Information.

Please read the Privacy Policy carefully before using the services offered through the Platform (the “Services”) or submitting your Personal Information to us. From time to time, we may supplement this Privacy Policy with additional information about our privacy practices related to the Platform or Services.

### What Personal Information We Collect

When you access, use, or interact with the Platform, we may collect certain Personal Information directly from you or automatically from the devices you use to access the Platform. “**Personal Information**” is information that identifies, relates to, describes, or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your household.

We may collect the following Personal Information from or about our Platform users who are, or are interested in, participating in one or more of our research Studies (the “**Research Participants**”):

- **Direct identifiers**, such as your first and last name, contact information (e.g., address, email address, and phone number), and Social Security number;
- **Demographic information**, such as your age, sex, gender, race, marital status, date of birth, place of birth, and language;
- **Health and other genomic information**, such as your medical history; information about your diagnoses, symptoms, and treatment; information from your electronic health records; genomic information (such as sequencing data, or other data about or obtained from your genes or DNA); and other health information we receive directly from you, your health care provider, or other outside databases that maintain such information about you;
- **User account information**, such as the username associated with your Platform user account;
- **Usage and other electronic activity information**, such as information about how you access and interact with the Platform, IP address, and information about the device and web browser you use to access the Platform; and
- **Geolocation data**, which is based on your IP address and other information made available through your device, depending on your device settings;
- **Other information you may provide** when you create a Platform user account or use the Services.

### Sources of Personal Information

Depending on how you use the Platform and Services, we may collect your Personal Information from the following sources:

- **Directly from you**, such as when you register for a Platform user account, upload or submit content to the Platform, and otherwise use the Services;
- **Through the use of cookies and other data collection technologies** that we have installed on the Platform. For more information on our use of cookies and similar technologies, please review the “Cookies and Data Collection Technologies” section below.
- **From third parties**. We may request your permission to contact your doctor to obtain a copy of your medical records. We may ask that you share your health data from wearable devices, mobile applications or data collected on your personal device to support health research.

### How We Use Your Personal Information

Depending on how you use the Platform and Services, we may use your Personal Information as outlined below:

- **Research**. We may use your Personal Information in accordance with the Study Consent.
- **Provide the Services**. We may use your Personal Information to validate and complete your Platform user account registration; provide, maintain, and improve the Platform and Services; respond to your questions and comments; and send you communications about the Study.
- **Communicate with you**. We may use your Personal Information to send you messages about the Study, conduct surveys, communicate with you about other research opportunities, and obtain and respond to your feedback, questions, and comments.
- **Improve the Services**. We may use your Personal Information to facilitate the operation of the Platform and Services; assess user engagement with the Services; perform market research and analysis; analyze how the Services are being used and accessed; improve the functionality of the Platform and your user experience; conduct quality assurance activities, and perform internal business reviews.
- **Maintain the security of the Platform**. We may use your Personal Information to maintain the security and integrity of the Platform, detect security incidents, protect the Platform against fraudulent and illegal activity, and enforce our terms of use.
- **Comply with legal obligations and respond to legal proceedings**. We may use your Personal Information to comply with our legal obligations, including maintaining records of our compliance with federal and state law requirements. We may also use your Personal Information to establish, exercise, or defend legal claims.

We may also use your information for other purposes consistent with the context of the collection of your Personal Information, as otherwise disclosed to you at the time your Personal Information is collected, or with your consent.

### How We Disclose Your Personal Information

Examples of reasons we may share your Personal Information:

1. **Scientific Research**. The Principal Investigators and the ACS research staff will use and share your Personal Information to conduct the study. Non-ACS researchers may also have access

- to your information for research projects, but they will not receive personal identifying information with this data. For more information on how we use your data for research please review your study consent form.
2. **ACS Service Providers.** Another example is a company that is a service provider for ACS like Manifold.
  3. **Study oversight and legal obligations.** Agencies that oversee our research such as the Emory Institutional Review Board may ask to see Personal information to make sure study participants like you are being protected. Government agencies that regulate research such as the Office for Human Research Protections may use your Personal Information to make sure the research is done correctly and safely. We will protect your records to the extent allowed by law, but in some circumstances may be compelled by court order to share your Personal Information

### **Cookies and Other Data Collection Technologies**

We may use “cookies” and other data collection technologies to collect certain information about you on the Platform. Cookies are small data files that are sent to a web browser and stored on a device. Cookies are commonly used by website operators to store information about website visitors and allow website operators to authenticate visitors, recognize visitors, save visitors’ preferences, and analyze the use of a website.

We may partner with certain third parties to collect and analyze information about your use of the Platform and the Services through cookies and other data collection technologies. This information helps us troubleshoot Platform malfunctions and improve accessibility and usability of certain Platform features and the Services.

To learn more about cookies and similar technologies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org). Most web and mobile device browsers automatically accept cookies. If you prefer, you can change your browser to prevent that or to notify you each time a cookie is set. You may also choose to opt out of receiving interest-based advertising by visiting the Network Advertising Initiative’s [Opt-Out Tool](#).

### **Opting Out of Communications**

We may communicate with you by email, telephone, or SMS text message about the Platform or Services. If you have opted in or otherwise qualify to receive these forms of communication, and no longer wish to receive such communications, you may opt-out or unsubscribe by following the instructions that are included in the communication or by contacting us using the information provided in the Contact Us section below.

### **Retention of Your Personal Information**

As a general matter, we may keep your Personal Information for as long as you remain in the study. If you withdraw from the study and request that your data be deleted, we will delete it from the Platform.

### **Security of Your Information**

We maintain administrative, technical, and physical safeguards designed to protect against unauthorized access, use, modification, and disclosure of your information in our custody and control. No data, on the Internet or otherwise, can be guaranteed to be 100% secure. While we strive to protect your information from unauthorized access, use, or disclosure, we cannot and do not ensure or warrant the security of your information.

### **Do Not Track**

Some web browsers have “Do Not Track” or similar features that allow visitors to tell each website they visit that they do not want their activities on that website tracked. There is no uniform standard for implementing and recognizing “Do Not Track” signals. For that reason, at present, the Platform does not respond to “Do Not Track” signals.

### **Information for Users Located Outside of the United States**

If you use or access the Platform and its Services or provide us your information from outside the United States, your Personal Information will be transferred to, stored and processed in the United States and other countries where ACS and its service providers operate in accordance with this Privacy Policy and applicable laws. Please note that data protection and consumer protection laws of the United States and such other countries may differ from the data protection or consumer protection laws in your country. By using or accessing the Platform and its Services or providing us with your Personal Information, you understand that your information will be collected from and processed in the United States and other countries where ACS and its service providers operate, and acknowledge that your Personal Information may be subject to access by law enforcement and other government entities, including courts and tribunals, in accordance with laws applicable in those jurisdictions.

### **Third-Party Links**

The Platform may contain links to other websites that we do not own or control. If you visit a third-party website, we encourage you to review that website’s privacy policy to understand how that website operator will treat your information. Our Privacy Policy does not apply to these third-party websites.

### **Changes to this Privacy Policy**

At times, it may be necessary for us to make changes to this Privacy Policy. We reserve the right to change this Privacy Policy and any of our policies or procedures concerning the treatment of information. Where we make material changes to this Privacy Policy, we will take steps to notify you of those changes by, for example, posting notice on the websites or emailing you using the contact information we have on file. You can determine when this Privacy Policy was last revised by referring to the “Last Updated” legend at the top of this page. Any changes to our Privacy Policy will become effective upon posting of the revised Privacy Policy. We encourage you to bookmark this page and to periodically review it to ensure familiarity with the most current version of our Privacy Policy.

## Contact Us

Please feel free to contact us at any time if you have any questions or comments about this Privacy Policy. Contact ACS at [thevoices@cancer.org](mailto:thevoices@cancer.org) or [cps3@cancer.org](mailto:cps3@cancer.org). Contact Manifold at [privacy@manifold.ai](mailto:privacy@manifold.ai).