

NOTICE OF DATA PROCESSING

This notice describes how the Icahn School of Medicine at Mount Sinai (“we” or “Mount Sinai”) collects, uses, shares, and otherwise processes personal information about you (“personal data”) if you register and/or participate in an educational course offered by Mount Sinai.

Processing of Personal Data

If you register and/or participate in an educational course, we may process the following types of personal data:

- Information you provide on your registration form (*e.g.*, contact information, institutional affiliations, education)
- Payment information (*e.g.*, credit card number, bank account number)
- Interaction data (*e.g.*, questions or responses you submit, your forum contributions or other posts)
- Assessment data (*e.g.*, assignment responses, test scores)
- Survey data (*e.g.*, responses you provide to surveys that we send you about the course)

We also process personal information about prospective course participants (*i.e.*, names and mailing addresses) in order to send information about programs that may be of interest to you. We may receive this information from third parties.

We (or our vendors) collect personal data directly from you when you complete a registration form, submit materials through our online platform, or otherwise communicate with Mount Sinai.

We may process your personal data for the following purposes, as applicable:

- To process your registration and to communicate with you about your registration
- To deliver the educational content to you, including conducting assessments and awarding credit
- To communicate with you about program offerings
- For research, statistical, or analytical purposes (*e.g.*, to assess our programs and improve our offerings)
- For compliance with legal obligations, to respond to subpoenas, court orders, or other legal process, and to enforce our agreements and contracts
- To meet the obligations of private organizations with oversight over Mount Sinai, such as accreditation organizations
- To protect the health, safety, or rights of you, faculty and staff, other participants, and visitors
- To prevent or investigate fraud or other unlawful activity, and to protect the security of Mount Sinai’s property, website, and other systems

The lawful bases for the collection and other processing of personal data by Mount Sinai are the following:

- Processing is necessary for the purposes of the legitimate interests pursued by Mount Sinai (*e.g.*, assessing our educational offerings, maintaining accreditation)
- Processing is necessary to process transactions requested by you and to meet our contractual obligations (*e.g.*, to register you for the program, process your payment, and deliver the content)
- Processing is necessary to comply with a legal obligation to which Mount Sinai is subject
- With your consent, when applicable

We will share your personal data, only as necessary, in the following manner:

- With vendors that we engage to provide services (*e.g.*, service providers, IT vendors)

Transfer of Personal Data Outside the European Economic Area (“EEA”) and United Kingdom (“UK”)

Mount Sinai is located in the United States. Personal data that we collect will be processed in the United States. The data protection laws in the United States may not offer you the same protections as in your country. We comply with applicable U.S. laws protecting individuals’ privacy and employ reasonable technical and organizational safeguards in order to protect the privacy and security of your personal data. We may also transfer your personal data to third parties, including our vendors, as described in this notice that may be located outside of the EEA or UK as permitted by applicable law.

Retention of Data

In order to comply with accreditation requirements, we retain all attendance, assessment, and evaluation records for 6 years. Thereafter, we retain certain personal data for our record-keeping and archiving purposes and as necessary to comply with legal and contractual obligations.

Individual Rights

If you are located in the EEA, you may have the following legal rights under applicable law with respect to the personal data processed by Mount Sinai:

- To access the personal data that we have about you
- To request that we rectify or erase your personal data
- To request that we restrict the way we use your personal data
- To object to the way we use your personal data
- To ask us to transfer your personal data to someone else
- To lodge a complaint with a data protection authority in the EEA

Our ability or obligation to comply with your requests may be limited by applicable law and our internal policies, procedures, and operations.

Contact Information

The controller of the personal data described in this notice is:

Icahn School of Medicine at Mount Sinai
1 Gustave L. Levy Place
New York, NY 10029-5674

If you have questions about the processing of your personal data, or would like to request to exercise one of your rights as a data subject, please contact us at Compliance.info@mountsinai.org.