

PRESS GANEY EU PRIVACY NOTICE

Last modified: 01/01/2020

1. INTRODUCTION AND APPLICABILITY

THIS EU PRIVACY NOTICE SUPPLEMENTS THE PRESS GANEY GENERAL PRIVACY POLICY AND SETS FORTH ADDITIONAL INFORMATION APPLICABLE TO EU RESIDENTS.

This Press Ganey EU Privacy Notice (“Notice”) supplements the information contained in Press Ganey Associates LLC’s (“Press Ganey,” “we,” “our,” or “us”) [Privacy Policy](#) (“Privacy Policy”) and applies solely to all visitors, users, and others who reside in the EU (“you”). We adopt this Notice to comply with the EU’s General Data Protection Regulation 2016/679 (“GDPR”). Any terms not defined in this Notice will have the meaning set forth in our Privacy Policy or as defined by the GDPR when used in this Notice. The terms of this Notice apply only to individuals residing in the EU.

Please note that this Notice is meant to be read in connection with our Privacy Policy, so please consult the Privacy Policy for further information on what types of information we collect, and how we use and share such Personal Data. If you have any questions, please contact us at privacy@pressganey.com or by using the information set forth in our Privacy Policy.

Generally, Press Ganey serves as a data processor for customers who direct us to collect Personal Data on their behalf. For background, Press Ganey’s offers its customers an integrated solution to collect and analyze patient, workforce member, and customer feedback. As part of our services, our customers (typically either your health care provider, employer, or other company that is Press Ganey’s direct customer) may share your information with us for Press Ganey to contact you about your experiences. When we are collecting information from you on behalf of our customers, we are acting as a data processor, and we will only collect, use, and otherwise process your Personal Data as directed by our customers.

To this end, if you have received a survey from Press Ganey on behalf of your health care provider, employer, or other company that is Press Ganey’s direct customer, this Notice does not apply to your information. For detailed privacy information related to when we process your information on behalf of a Press Ganey customer, or if you would like to request or exercise any of your rights under applicable law for any Personal Data we may have collected from you, please reach out to the respective customer directly. If you are unsure what customer directed us to collect information on their behalf from you, please consult the survey invitation you received that directed you to our services. Because we may only access a customer’s data upon instruction from that customer, if you wish to make your request directly to us, please provide to us the name of the Press Ganey customer who submitted your data to us. We will refer your request to that customer, and will support them as needed in responding to your request within a reasonable timeframe. We are not responsible for the privacy or data security practices of our customers, which may differ from those set forth in this Notice and our Privacy Policy.

If you are personnel of a Press Ganey customer who is using the site to review, analyze, or otherwise process survey responses in your professional role, this privacy policy does not apply to you because we are serving as a processor as well. In such a case, we only collect business related information from you (i.e., email and username), and we do not use, share, or otherwise process any of your Personal Data except to perform our services or as otherwise set forth in the agreement between you and your employer. **Accordingly, for detailed privacy information related to your use of the Site when receiving or using our services, or if you would like to request or exercise any of your rights under applicable law for any Personal Data we may have collected from you, please reach out to your employer directly.**

We process Personal Data only when we have a lawful basis to do so, such as permitted by a data processing agreement with our customers, with your consent, as necessary for our legitimate interests, or as otherwise required or permitted by law. Your Personal Data will only be transferred outside of the European Economic Area, including to the United States, when it is legally permissible to do so.

You have certain rights relating to your Personal Data, subject to local data protection laws. These rights may include:

- A right to access personal data
- Rectification of inaccurate personal data
- Erasure of personal data
- Restriction of processing of personal data
- Right to data portability
- Right to object to processing of personal data
- Right to withdraw consent to processing of personal data
- To the extent our services involve automated decision that produces a legal effect based on your Personal data, the right to opt-out

If you wish to exercise these rights in relation to Personal Data that may have been collected, you should first contact the employer, health care provider, or other Press Ganey customer who directed you to us. If you need additional assistance, please contact us using the contact information below. Please note we may first ask you for additional information to verify your identity and we may need to seek permission from your health care provider, employer, or other Press Ganey customer before doing so. We reserve the right to limit or deny your request if you have failed to provide sufficient information to verify your identity or to satisfy our legal and business requirements.

We will hold all Personal Data for so long as we have an obligation to our customer to provide the services to them, and thereafter until such time as set forth in our customer agreement or upon a valid deletion request.

If you have questions about the above, have any request to modify your data to make it as accurate or up to date as possible, or for any other questions in regard to this Notice, please contact our Privacy Officer using the information below. Individuals may also complain to a relevant supervisory authority, however we request that you kindly contact us first so we can attempt to resolve the issue.

Press Ganey Associates LLC

Attn: Privacy Officer

404 Columbia Place

South Bend, IN 46601

1-800-232-8032

privacy@pressganey.com