

Privacy Policy

ARC, LLC is a Limited Liability Corporation and a United States registered business.

Privacy Policy Effective July 4, 2020

ARC Healthcare, LLC (“ARC”) values the privacy of those who provide personal information to us. This privacy policy (the “Policy”) describes how and why we collect, store, and use personal information, and provides information about individual’s rights.

This Policy applies to both personal information supplied to us either by an individual or by others. We may use personal information supplied to us for any of the purposes as set out in this Policy, or as otherwise disclosed at the point of collection.

This Policy is an important document. We recommend that you read it carefully and print and keep a copy for your future reference.

Your rights in relation to Personal Information and how to exercise them

Under certain circumstances you have the following rights:

- the right to ask us to provide you, or a third party, with copies of the Personal Information we hold about you at any time and to be informed of the contents and origin, verify its accuracy, or else request that such information be supplemented, updated or rectified according to the provisions of local law;
- the right to request erasure, anonymization or blocking of your Personal Information that is processed in breach of the law;
- the right to object on legitimate grounds to the processing of your Personal Information. In certain circumstances we may not be able to stop using your Personal Information, if that is the case, we will advise you as to why; and
- withdrawal of consent – while we do not generally process Personal Information on the basis of consent when Personal Information is processed on the basis of consent an individual may withdraw consent at any time (this may apply to processing of special categories of Personal Information where you have instructed us to act on your behalf and includes the following: racial/ethnic origin, political opinions, religious or philosophical beliefs and trade union membership). In the event that you no longer want to receive any marketing material from us, please use the unsubscribe option (which is in all of our marketing emails to you), or contact us as per the information set out below.

To exercise such rights (bar withdrawing from marketing emails – as described above) and if you have any questions about how we collect, store and use Personal Information, then please contact us using the details as set out in the “contact information” section below.

What basis do we have for processing your Personal Information?

We will only process personal Information where we have a lawful reason for doing so. The lawful basis for processing Personal Information by us will be one of the following:

- the processing is necessary for the performance of a contract you are party to or in order to take steps at your request prior to you entering into a contract;
- the processing is necessary in order for us to comply with our legal obligations (such as compliance with anti-money laundering legislation);
- the processing is necessary for the pursuit of our legitimate business interests (including that of the delivery and the promotion of our services); and
- processing is necessary for the establishment, exercise, or defense of legal claims.

What Personal Information do we collect and process?

We aim to be transparent about why and how we process Personal Information. For further information on our processing activities please review the relevant section below:

Business contacts

Collection

Personal Information is collected may include name, email address, job title, telephone number, area of business, job role, jurisdiction, language, seniority, and other business contact information. The Personal Information may also be collected by virtue of us providing our services to you or at a networking event. In addition, Personal Information is also be collected via the ARC website when you complete a form.

Use

- For contact and communication purposes: we may use your contact information to send you updates that we may circulate from time to time, news about any events we are organizing or participating in, and/or other information about us and the services we provides that we believe may be of interest to you. You can specify your contact preferences when registering online to receive communications from us or by subsequently advising us of your contact preferences using options provided on all of our marketing emails or the contact details as set out in the “contact information” section below.
- Making contact details available to ARC at info@ARC.com
- Performing analytics – such as trends, sales intelligence, marketing effectiveness (such as click and open rates) uptake and progress.

Retention

Personal Information is retained for as long as it is necessary for the purposes set out above (being the length of the business relationship). If a business contact requests to be forgotten their contact details will be deleted from HubSpot. If a business contact opts out of receiving

marketing materials their details will still be retained (as our lawyers may still be in contact) but marketing materials will no longer be sent.

Clients and individuals associated with clients

Collection

We request that our clients only provide Personal Information which is necessary for us to carry out our services.

In the majority of circumstances, we will collect Personal Information from our clients or from third parties acting on behalf of our clients.

Use

- Providing content or event information: we will use and disclose Personal Information in such a manner as we believe is reasonably necessary to provide our services, for example we may need to instruct overseas counsel on your behalf (including correspondence with you), to liaise with other professional service providers in relation to matters that we are handling, or because we need to liaise with the opposing party on a matter you have instructed us on.
- Administration: to collect our fees or costs in connection with other legal enforcement, we will use Personal Information to agree payment arrangements, and to collect our fees and costs owing to us in connection with legal enforcement.
- Managing client relationships: providing clients with information on our services and event updates that we consider may be relevant to them; arranging and hosting events; and identifying where we may make improvements in service delivery.
- Client engagement: as part of our client on – boarding process we carry out certain background searches to verify whether or not there are any potential issues that may mean we cannot work with a particular person (to identify criminal convictions, politically exposed persons, sanctions or other potential reputation issues).
- Compliance with anti-money laundering regulation: we may use your Personal Information (e.g. evidence of your identity) in order to fulfil our obligations to check the identity of our clients in compliance with anti-money laundering law and regulations, this information will be shared with any relevant ARC required to support that instruction.

Retention

Our general retention period for documentation created for the purpose of providing content or event information is 12 years. In some instances, there are legal and regulatory exceptions which may require documentation to be held for longer or shorter periods. If you require further information, please contact us using the details as set out in the “contact information” section below.

Job applicants

Please refer to information made available when applying online for further details as to how Personal Information is collected, processed and how long it is retained for.

Journalists

Collection

Personal Information, including name, email address, telephone number and other business contact information, may be collected from PR agencies or from databases that we subscribe to.

Use

- Press releases and joint press releases from our clients/organizations that we are working with.
- Invitations to meet ARC or BTOES events staff.
- Press party.
- To highlight any spokespeople who may be of interest on a specific industry theme or topic relevant to the journalist.
- Business trips may require the use of the Personal Information to assist us with travel arrangements.
- Internal communications.

Retention

Personal Information will be retained for as long as it is necessary for the purposes of the above, or if you advise us you no longer wish to be contacted your Personal Information will be removed from our contact lists.

Suppliers (including individual contractors)

Collection

Personal Information, including name, email address, telephone number and other business contact information, is collected to receive services from suppliers, to manage the relationship with the supplier, and for the provision of services to our clients.

Use

- To receive services from our suppliers: please note that we will use and disclose their Personal Information in such manner as we believe is reasonably necessary to receive and to review the provision of those services from suppliers.
- Services to clients: if a supplier is assisting us in delivering services to our clients we will process Personal Information to manage that relationship.
- Administration: to agree payment arrangements with our suppliers, and to make payments to them.

Retention

A general retention period of 12 years will be applied unless there are any legal and or regulatory exceptions which may require documentation to be held for shorter or longer periods. If you require further information, please contact us using the details as set out in the "Data Controller contact information" section below.

Staff

Personal Information in relation to staff will be held on various internal systems and applications. A privacy notice which sets out the purposes for which Personal Information will be processed and contains information on data subject rights is provided to staff at the commencement of employment. If further information is required, please contact your local Human Resources department.

Visitors to the ARC websites

Collection

Personal Information will be collected if you sign up to attend any of our events and/or to receive our marketing literature.

Use

- Business contacts: if you have signed up to attend one of our events or to receive our marketing literature please see the paragraph above headed 'Business contacts'.

Who else may have access to your Personal Information?

On occasion, we may need to share your Personal Information with third parties. We will only share Personal Information where we are legally permitted to do so.

Where you supply us with Personal Information as a client, we will assume, unless you instruct us otherwise in writing, that we can disclose your Personal Information in such manner as we believe is reasonably necessary to provide our services (including as described in this Policy), or as is required under applicable law. This might be because, for example, we may pass your Personal Information to third parties such as:

- business partners, service providers and other affiliated third parties: to enable us to provide our services to you, we may need to share your Personal Information with another ARC or events, our business partners (including other professional advisers such as accountants or auditors), external service providers and/or overseas counsel. Our arrangements with external service providers currently cover the provision of support services including IT, AML/CDD checks, events management, document production, business and research, secretarial services, marketing and business development and facilities management.
- ARC or BTOES events: to provide services to you and also so that they may contact you (including by email) if you have expressly agreed to receive marketing communications about developments, services or events which may be of interest to you; through the joint use of

centralised IT tools; to manage our international client relationships; and to respond to your requests concerning access, rectification, objection and cancellation as regards the processing of your Personal Information; and

- disclosures required by law or regulation: in certain circumstances, please note that we may be required to disclose Personal Information under applicable law or regulation, including to law enforcement agencies or in connection with proposed or actual legal proceedings.

How we look after your Personal Information

We have in place appropriate technical and organizational security measures to protect your Personal Information against unauthorized or unlawful use, and against accidental loss, damage or destruction.

We put in place strict confidentiality agreements (including data protection obligations) with our third-party service providers.

Links to other websites

The ARC website, <http://archlt.com> and <http://helioscrc.com> may link to other, unaffiliated third party websites. Please note that ARC is not, and cannot, control or be responsible for the content or privacy and confidentiality practices of any third-party websites. You must always carefully review the privacy and confidentiality policy of any third-party website that you may visit in order to understand how the operators of that website may collect, store, and use your Personal Information.

Updates to this Policy

This Policy was last updated in July 4, 2020. Please check back regularly to keep informed of updates to this Policy.

Contact Information

ARC Healthcare, LLC
4140 S. Lapeer Road
Orion, Michigan 48359 USA
US: +1 248.475.445
Email: info@archlt.com

Commitment to User Privacy

ARC is committed to protecting your privacy. You can visit most pages on our websites without giving us any information about yourself. But sometimes we do need information to provide services that you request. This document is designed to give a clear explanation of ARC's data processing policies. Please see below for further information or if you have any questions or concerns relating to ARC's sites and/or data protection, please e-mail privacy at ARC dot com.

How may ARC use my personally identifiable information?

ARC uses your personally-identifiable information to fulfill your requests for information, publish your letters to the editor or comments, process your requests to participate in conferences and events, evaluate any job applications, recruit personnel, distribute newsletters and alerts to you, and for such other purposes as you may initiate or request. We may keep any of your personally identifiable information on file and use it to contact you.

The information we collect and the Primary Purpose for its collection

The information you provide is being collected by ARC for the purpose of processing your registration or enquiry or in order for us to provide services that you request. The provision of this information is voluntary. However, if you do not provide the information requested, we may be unable to process your registration or enquiry or provide the requested services. All information provided by you will be held in the strictest confidence. The information we collect includes (however is not limited to):

- Full name and job title
- Company name and address
- Phone and fax number
- E-mail address

ARC is the sole owner of the information collected on this site.

Use of Cookies and Log files

When you visit our websites, a cookie (a very small text file) is placed on your machine (if it is accepted); this is to provide you with a personalized experience and to assist in the collection of the site visitation statistics. You may refuse the cookie, if you wish. To do so, you will need to check your browser settings. ARC collects certain information about your computer hardware and software, this includes (however is not limited to):

- Your IP address
- Browser type
- Operating system
- Access times
- Referring website addresses

This information is used for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of ARC's websites. If you choose to not have your browser accept cookies, your viewing experience should not be affected.

Information sharing: Who we intend to share information with and why

We do not rent or sell our customer e-mail lists. We may share information with other professional organizations (including our event sponsors/exhibitors) to promote similar products and services. In particular, we will share information between different ARC sister companies. If you do not want to make your details available, please e-mail info@archlt.com, indicating either or both of the statements below:

- I do not wish to have my details made available to other organizations
- I do not wish to receive information about ARC events or services

Please note that while we will endeavor to make the updates as promptly as possible, you may receive communications whilst we process the changes. No list supplied by ARC may be used by anyone other than for the confidential use of the original mailer. All lists are seeded with decoy names to protect against abuse; violators will be prosecuted.

Links to other websites

ARC contains some links to other sites. Please be aware that ARC is not responsible for the privacy practices of such other sites. This privacy statement applies solely to the information collected by ARC. Surveys If you participate in a survey, all of our research results are reported as totals or in other aggregated form, and no information about you as an individual respondent is made public.

Correcting, updating, and removing your Personal Information

If your personal information is incorrect, changes or if you no longer wish to receive information from ARC, we will endeavor to correct, update, or remove your information as swiftly as possible. This can be done by e-mailing privacy at info@archlt.com . Please note that while we will endeavor to make the updates as promptly as possible, communications may be sent using the original details until the changes have been processed.

Data protection

If you no longer wish to receive newsletters or promotional materials, you may opt out of receiving these communications by following the “unsubscribe” method on the promotional piece or return the item(s) to us with “unsubscribe” marked upon it. However, very occasionally, it may be necessary to send you important service announcements about a conference you are attending, for example, and we may contact you to inform you of a venue change.

Notification of changes

ARC will occasionally update this privacy statement to keep up with changing legislation and best practice. When we do, we will also revise the “last updated” date at the top of the privacy statement. Please check back periodically for updates. In the interest of all parties, the information contained in this Site is liable to change and although ARC makes every effort to keep material on this Site up to date and accurate, there may be delays, errors or omissions.

ARC does not represent or warrant the suitability, completeness, accuracy of any information contained on this Site nor that any services will be uninterrupted, timely, secure, or error-free.