INTRODUCTION
Welcome to the website of the American Board of Pediatrics (“ABP,” “we,” or “us”). We are committed to respecting your privacy and to protecting any information you provide to us.

The purpose of this Privacy Policy is to describe what data we collect, why we collect it, how we use it, and why it is shared with third parties. Our goal in establishing this Privacy Policy is to assure you that information disclosed to us is handled appropriately regarding the privacy of this information.

As a convenience, we may provide links to third party websites that provide additional information. We do not control, nor are we responsible for, the privacy policies or practices of any other website.

Please note that your use of our website is also subject to our Terms of Use.

INFORMATION WE MAY COLLECT

Personal Information: We require that physicians provide certain personally identifiable information, including name, mailing address, email address, phone number, date of birth, government-issued identification numbers, education, and professional background information (“Personal Information”). We use this Personal Information to identify and communicate with physicians, as well as to determine their eligibility and qualifications to become a candidate for certification or to maintain their certification. By providing data, including Personal Information, to us, whether through registrations, surveys, forms, or otherwise, physicians consent to our use of their data in accordance with this Privacy Policy. Physicians may make limited changes to their Personal Information at any time by visiting our website, clicking the “Log In” button at the top right corner, and accessing their personal “Portfolio Landing” page.

Training Information: We require that program directors and program coordinators provide certain Personal Information regarding themselves, including name, mailing address, email address, date of birth, and title. In addition, program directors and program coordinators provide Personal Information of residents and fellows within their training programs which includes date of birth and government-issued identification numbers, training qualifications, participation in activities, and credentialing information. We use this information to track residents’ and fellows’ training, administer in-training examinations, grant access and award credit for activities completed by residents, and credential residents and fellows for certification examinations. Program directors and program coordinators may make changes to their Personal Information at any time by visiting the Program Portal through the ABP website, then accessing the “Manage Profiles” page.

Survey Information: We may include brief surveys during the examination application process, enrollment into the Maintenance of Certification program, and at the end of some exams. In addition, we may survey trainees and diplomates directly concerning specific topics. This information is used for our internal business purposes, to inform and improve our programs, and also to anticipate trends in the pediatric workforce.

Financial Information: When physicians pay an examination fee or Maintenance of Certification enrollment fee via our website or when program directors or program coordinators pay for in-training examinations given by their programs, certain financial information, such as credit card numbers,
credit card expiration dates, and billing addresses, are used to charge the physician or the program. Credit card information is passed to our credit card processing vendor, and the credit card number, security code, and expiration date are not retained by us.

**Anonymous Information:** As individuals navigate through our website, we may collect and store anonymous information about them using various technologies such as cookies, Internet tags, advertising pixels, and navigational data. “Cookies” are tiny alphanumeric identifiers that are stored on your computer and allow us to adjust the website to meet your personal browsing preferences. If the browser is set to refuse cookies, access to the private, secured section of our website will not be provided. Google Analytics is also used to collect information about the website, such as how often users visit the website, what pages they visit, and what other sites they used prior to coming to the Website. To learn more about how Google collects and uses data when you visit the website, please visit [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/). Every time a site user requests or downloads a file from [www.abp.org](http://www.abp.org), we may store the IP address and data about these events in a log file. In addition, we may store data about problems encountered with our mobile apps in log files. We may use the information from Google Analytics and log files to analyze trends to improve usability, to ensure established performance levels are achieved, to resolve a user’s problems by tracing historical movements, and to gather broad demographic information for aggregate use or for other business purposes.

**How Information is Used in Internal Business Purposes:** The ABP makes information available to its employees, appointees, and contractors for internal business purposes such as to track training of residents and fellows; credential physicians for initial certification and maintenance of certification; conduct the registration, administration, and scoring of examinations; and to offer and record completion of certification and maintenance of certification activities approved by the ABP.

**Release of Certification Status:** We consider a physician’s certification status, including the current status of the physician’s participation in the ABP’s “Maintenance of Certification” program and the physician’s certification history, to be public information. We may publish on our website a physician’s current and historical certification status, and we may disclose this information to third parties.

**Release of Information to Third Parties for Internal Business Purposes:** We generally regard all other information about individuals as private and confidential, and will therefore typically use it only for our internal business purposes. However, we may disclose certain information in certain circumstances, including the following:

1. **Diplomate Data**
   We share information regarding a diplomate's certification status, Personal Information, and educational information with the American Board of Medical Specialties (ABMS), which publishes *The Official ABMS Directory of Board Certified Medical Specialists*; medical societies, including the American Academy of Pediatrics, which publishes the journal *Pediatrics*, to help maintain the currency and accuracy of diplomate records, and to provide Continuing Medical Education credit for activities created by the ABP; the Federation of State Medical Boards (FSMB), to help maintain the currency and accuracy of diplomate records and to publish the
FSMB Physician Profile; Data Commons, which enables data transfers, to provide ABP-released data exchange among approved third parties; and with other third parties we determine to be reasonable and in the interest of the ABP to fulfill its mission and purposes.

2. Resident/Fellow Examination Scores and Summary Performance Evaluations
We release information regarding summary evaluations obtained through the resident and fellow tracking system, (including dates of training, credit provided for that training, final evaluation and In-Training exam scores) upon the request of a trainee/diplomate or the request of a training program that has accepted or is considering accepting a resident/fellow in transfer, or when we become aware that a resident/fellow has entered a new training program, either through the tracking and evaluation system transfer form or through other means of communication. We also provide residency/fellowship training directors the individual examination results for each of their residents/fellows on their in-training and certifying examinations.

3. Additional Data
For joint board certifications where we are not the administrating Board, we release information necessary for the administrating board to permit the physician to sit for an examination. We release data to third parties in order to deliver examinations. We also release minimal data to outside organizations that provide ABP-approved self-assessments, Quality Improvement projects, Performance Improvement Modules (PIMs), or other activities in order for our residents, fellows, and diplomates to access those modules.

4. Electronic Communications
We may use third party companies to deliver electronic communications and surveys. In these circumstances, we will enter into commercially reasonable confidentiality agreements with these third parties to safeguard the information they transmit on our behalf.

**Release of Information to the Public and/or to Third Parties for Other Purposes:** We regard the results of an individual physician's examination(s), assessment(s), ABP-approved activity performance, and survey responses as private. However, the ABP may disclose and/or publish certain de-identified, individual level data or aggregate results in certain circumstances for 1) dissemination of ABP efforts to improve its programs which may include, but is not limited to, examination pass rates and training program pass rates; 2) pediatric workforce data to inform the broader pediatric community which may include, but is not limited to, aggregated analysis published in our annual workforce data book; or 3) for research/evaluation purposes. When a third party is involved in any of these circumstances, we will enter into commercially reasonable data sharing agreements requiring the third parties to safeguard the data. Similarly, we may share information with an Institutional Review Board to review research initiatives, if required.

**CONDITIONAL RELEASE OF INFORMATION**
1. Misconduct
We reserve the right to disclose, and typically will disclose, information in our possession to appropriate investigators or entities (e.g., state medical boards, other credentialing bodies) and may make public information regarding any individual whom the ABP, in our sole and absolute
discretion, suspects or determines has: (i) violated our rules, policies, procedures, or required competencies (e.g., codes of ethical behavior); (ii) engaged in misrepresentation or unprofessional behavior; (iii) had his/her diplomate status revoked or been otherwise disciplined; or (iv) demonstrated signs of impairment.

2. Court Order
We will disclose all relevant information in our possession for which we do not have a claim of legal privilege in response to a lawful subpoena, court order, or an authorized request by a government or regulatory entity.

3. Consent
We will release information not otherwise disclosed pursuant to this Privacy Policy to third parties upon the direction of and receipt of a signed authorization from the physician for whom the information pertains.

4. Other
We may respond to research requests from individuals or organizations on a case-by-case basis. Other than as identified herein, we ordinarily do not disclose physician information to third parties, including contact information for marketing or outreach purposes. In the event we must disclose information in other circumstances, a reasonable effort will be made to notify the physician whose information is sought. If we transfer all or a portion of our operations or assets to another organization, we would contractually require the recipient to treat the transferred information in accordance with this Privacy Policy.

PROTECTION OF YOUR INFORMATION
We have put in place commercially reasonable physical, electronic, and managerial procedures to safeguard and secure the information that we collect. In 2014, the ABP established a Privacy Management Program, which is a comprehensive, organization-wide program describing the philosophical and practical process for how we address the collection, use, retention, disposal, sharing, and protection practices of personally identifiable information within the organization and define the security policies and practices that are taken to safeguard that information. However, no security system is perfect. Thus, we cannot guarantee that information transmitted to us over the Internet will not be intercepted and therefore may not remain private.

Credit card processing activities and related technologies must comply with the Payment Card Industry Data Security Standard (PCI-DSS). We undergo regularly scheduled audits by an independent security firm to ensure our compliance with the PCI-DSS and other security standards. We will not otherwise share an individual's financial information with third parties for any other purpose except as required by law (such as complying with a subpoena or court order).

USE OF WEBSITE BY CHILDREN
The website is not intended for children under the age of 13. We will not knowingly collect personally identifiable information via the website from visitors in this age group and will take prompt steps to delete any such personally identifiable information.
CHANGES TO THIS PRIVACY POLICY
We reserve the right to periodically update or change this Privacy Policy. Our posting of an update to this Privacy Policy on our website will serve as notice of that update. The updated statement (along with its effective date) may be viewed by visiting our website and selecting the “Privacy Policy” link at the bottom of the home page.

TRANSFER OF INFORMATION ACROSS INTERNATIONAL BOUNDARIES
When visiting our website from a country other than the United States, or while in the United States but connected to an overseas virtual protocol network (VPN), electronic communication will necessarily result in the transfer of information across international boundaries. By visiting our website and communicating electronically with us, you consent to these transfers.

TRACKING
At this time, our website does not respond to web browser “do not track” signals. We may add this functionality in the future, and if we do, this Privacy Policy will be updated and a notice will be placed on the website. For now, third parties may collect personally identifiable information about your online activities over time and across different websites when you use our website.

FOR CALIFORNIA USERS ONLY
California Civil Code Section 1798.83 requires certain businesses to disclose, upon a written request, (i) a list of the kinds of personal information that the business has disclosed to third parties for direct marketing purposes during the preceding calendar year, and (ii) the names and addresses of all of the third parties that received personal information from the business for direct marketing purposes during the preceding calendar year. Businesses must respond to such requests within 30 days, but they are only obligated to respond to one request from a customer in a calendar year.

If you live in California, you may request this disclosure by sending an e-mail request to privacy@abpeds.org listing your name, address, and e-mail address. You must also specifically indicate the nature of your request by including the following language or language substantially similar to it: “I request that you send me your third-party information sharing disclosures as required by California Civil Code Section 1798.83.” Alternatively, you can mail your request to the following address: 111 Silver Cedar Court, Chapel Hill, NC 27514, ATTN: Operations Department.

HOW TO CONTACT THE ABP
Questions regarding this Privacy Policy should be directed to us by email to privacy@abpeds.org, by phone at (919) 929-0461, or by writing to the following address:
ATTN: Operations Department
111 Silver Cedar Court
Chapel Hill, NC 27514

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