

BLOOD CENTERS OF AMERICA - PRIVACY POLICY

Last Updated and Effective: 11/8/2024

1. WELCOME!

Blood Centers of America (“we,” “us,” “our”, or “BCA”) takes your privacy seriously and we know you do too. This privacy policy (“Policy”) is here to help you understand how we collect, process, and share your Personal Information (as defined below). We also describe our security practices with respect to your Personal Information, as well as your rights & choices with respect to how we process that Personal Information. Please read this Policy carefully.

2. SCOPE & ACKNOWLEDGMENT

This Policy applies to your use of our “Services,” which include the following:

Our “Offline Services”

- Such as when you visit our offices or contact us via phone call.

Blood center coop members (“Co-op Members”) may have separate privacy policies, and information processed by Co-op Members, such as in relation to sample collection, is not subject to this Policy. Please review any relevant Co-op Member’s privacy policy for information regarding their privacy practices.

Our “Digital Services”

- Our websites, including <https://bca.coop/>, <http://www.bcadata.com> (the “Site”), and any other website, application, or services where we post or link to this Policy; and
- Our social media pages and any other online services.

This Policy does not apply to information processed by third parties, for example, when you visit a third-party website or interact with third-party sites, except to the extent those parties collect or process information on our behalf. Please review any relevant third party’s privacy policy for information regarding their privacy practices.

Your use of our Services indicates your acknowledgement of the notices provided in this Policy.

3. CONTACT US

The controller of your Personal Information under this Policy is Blood Centers of America. For general inquiries and data updates, you may contact our Data Privacy Team as follows:

Phone (General Inquiries): 401-381-0600

Address: 1300 Division Road, Suite 102 West Warwick, Rhode Island 02893

General Inquiries: privacy@bca.coop

Data Rights Requests: email privacy@bca.coop, [Data Rights Request Form](#), or call 844-698-9362

4. CATEGORIES AND SOURCES OF PERSONAL INFORMATION

Categories of Personal Information We Process

In order to provide our Services, we may collect and process information that relates to identified or identifiable individuals (“Personal Information”). We collect and process the following categories of Personal Information (note, specific Personal Information elements are examples and may change):

Audio/Visual Data- Audio files and records, such as voicemails, call recordings, and the like or any photos or images that you may provide to us in connection with our Digital Services.

Biographical Data- Data relating to professional and employment history, qualifications, and similar biographic information.

Contact Data- Identity Data used to contact an individual, e.g. email address, physical address, or phone number.

Device/Network Data- Personal Information relating to your device, browser, or application e.g. device identifiers, identifiers from cookies, session history and Site navigation metadata, and other data generated through applications and browsers, including via cookies and similar technologies.

General Location Data- Non-precise location data, e.g. location information derived from IP addresses.

Identity Data- Personal Information about you and your identity, such as your name or IP address.

Inference Data- Personal Information we create or use as part of a profile reflecting your preferences, characteristics, aptitudes, market segments, likes, favorites or your interests.

Sensitive Personal Information- We may process Personal Information deemed “sensitive” under California or other laws, such as social security, driver’s license, state identification card, or passport number; account log-in and password, financial account, debit card, or credit card number; precise location data; racial or ethnic origin, religious or philosophical beliefs, etc. We may collect the following categories of Sensitive Personal information:

- **“Health Data”** Information relating to your donation such as height, weight, age, date of birth, and blood type.
- **“Payment Data”** Information such as bank account details, payment card information, including similar data protected as Sensitive Data under applicable law, and relevant information in connection with a financial transaction.
- **“Race and Ethnic Origin Data”** Information such as race or ethnic origin if you provide it.

Note: Health data and Race and Ethnic Origin Data is collected and processed on behalf of our Co-op Members, and is not subject to this policy.

Transaction Data - Information about the products and services we provide to you and about transactions you make with us and similar information.

User Content- Personal Information included in content provided by users of the Site in any free-form or unstructured format, such as a post or comments on our social media accounts, text in a “contact us” box, in a file or document, or any other message to us.

Sources of Personal Information

We collect Personal Information from various sources based on the context in which the Personal Information will be processed:

You- We collect Personal Information from you directly, for example, when you submit an order, input information into an online form, or contact us directly.

Your Devices- We may collect certain Personal Information automatically. For example, we collect Device/Network Data automatically using cookies and similar technologies when you use our Site or when you open our marketing communications.

Co-op Members- We may receive Personal Information from our Co-op Members and purchasing associates.

Service Providers- We receive Personal Information from service providers performing services on our behalf, including payment processors, web hosting service providers, other technology service providers.

Suppliers and Partners- We may receive Personal Information from suppliers and partners for Co-op Members and through the American Association of Tissue Banks (AATB).

Data we create or infer- We, certain partners, and third parties operating on our behalf create and infer Personal Information such as Inference Data based on our observations or analysis of other Personal Information processed under this Privacy Policy, and we may correlate this data with other data we process about you.

Social Media Companies- We receive Personal Information from social media companies (such as LinkedIn) when you interact with us on that social media company’s platform (e.g. our company page or account) on or in connection with the operation of social media integrations on our Services.

5. DATA PROCESSING CONTEXTS / NOTICE AT COLLECTION

Website

Generally

When you visit our Site, we automatically collect and process Identity Data, Inference Data, General Location Data, and Device/Network Data. We use this data as necessary to initiate or fulfill your requests for certain features or functions through our Site, such as delivering webpages or logging activities for security purposes. We may also process this Personal Information for our Business Purposes.

Cookies and Similar Tracking Technologies

We process Identity Data, Device/Network Data, Contact Data, Inference Data, Transaction Data, and General Location Data in connection with our use of cookies and similar technologies on our Site. We may collect this data automatically.

We and authorized third parties may use cookies and similar technologies to process such data for the following purposes:

- for “essential” purposes necessary for our Site to operate (such as maintaining user sessions, content delivery, and the like);
- for “functional” purposes, such as to enable certain features of our Site (for example, to your login credentials as you navigate the Site);
- for “analytics” purposes and to improve our Site, such as to analyze the traffic to and on our Site (for example, we can count how many people have looked at a specific page, or see how visitors move around the Site when they use it, to distinguish unique visits/visitors to our Site, and what website they visited prior to visiting our Site, and use this information to understand user behaviors and improve the design and functionality of the Site).

We may also process this Personal Information for our Business Purposes. See the “Rights and Choices” section below for information regarding opt-out rights for cookies and similar technologies.

Please note, in some cases, third parties may view, edit, or set their own cookies or place web beacons on our Site. We, or third-party providers, may be able to use these technologies to identify you across Site, devices, sites, and services. Third parties have their own privacy policies, and their processing is not subject to this Policy.

Dashboards

We process Identity Data, Inference Data, Device/Network Data, and Contact Data when you sign-in to your dashboard account, such as the BCA Member Blood Center Dashboard, Non-Blood Center Customers and Vendors Dashboard, or BCA GOLD Dashboard. We may also process Payment Data if you associate payment information with that account.

We process this Personal Information to create and maintain your account, to provide the products and services you request, and for our Business Purposes.

Orders and Payments

We process Contact Data, Device/Network Data, Identity Data, Payment Data, Transaction Data, and User Content when you order a product through our Site. We process this Personal Information as necessary to perform or initiate a transaction with you, process your purchase transaction, order, and payment, carry out fulfillment and delivery, document transactions, and for our Business Purposes.

We use third party payment processors to process payments on our behalf. Unless you store Payment Data as part of an account or profile, we do not store your Payment Data. Note: third-party payment operators own data processing operations are outside the scope of this Policy.

Contact Us

We process Identity Data, Contact Data, Device/Network Data, and any Personal Information contained within any User Content when you contact us using a contact phone number, fax, mail, or email. We may process Audio/Visual Data if you contact us via phone, leave a voicemail, or submit a photo with your request.

We process Identity Data, Contact Data, User Content, and Audio/Visual Data as necessary to communicate with you about the subject matter of your request and related matters. We may also process this Personal Information for our Business Purposes.

Professional Engagements

We process Identity Data, Contact Data, Biographical Data, and User Content in connection with your or a Co-op Member's application to become a supplier, partner, or Co-op Member. We process Personal Information collected in the context only as necessary to evaluate, establish, and maintain the professional relationship, and for our Business Purposes.

Blood and Tissue Donations

When you provide a blood or tissue donation at one of our Co-op Member sites, data collection, processing, and sharing is typically handled by the Co-op Member and is outside the scope of this Policy. However, we may receive certain Personal Information from Co-Op Members, including Identity Data, Health Data, or if you provide it, Race and Ethnic Origin Data.

We process this Personal Information for administrative purposes, such as to prepare aggregated reports or charts that can be used by Co-op Members to improve operations, and for our Business Purposes.

Please note: We collect and process this Personal Information on behalf of Co-op Members. This Personal Information is processed subject to the privacy policies of our Co-op Members.

Social Media

We process Identity Data, Contact Data, and User Content if you interact with or identify us on social media (e.g. if you post User Content that engages with or tags our official accounts). We process this Personal Information as necessary to interact with you on the social media platform, for our Business Purposes.

Transactional and Promotional Communications

We may process Identity Data, Device/Network Data, and Contact Data in connection with email communications that we send in relation to our Services. For example, we send transactional emails communications to you if you subscribe to our newsletters or company communications, make a purchase, or in connection with our delivery of products or services that you request. Additionally, you may receive promotional email communications if you contact us, choose to receive them, or interact with us in way that allows us to send you those communications. We may also automatically collect Device/Network Data when you open or interact with promotional communications so that we can better understand engagement with our promotional communications.

We generally process this Personal Information as necessary to deliver our communications and to understand engagement with those communications. We may also process Personal Information collected in this context for our Business Purposes g. You can opt out of promotional communications at any time as specified in the "Rights & Choices" section below.

In-Person Events

We may process Identity Data, Contact Data, and Transaction Data when you interact with us at an in-person event, such as a conference, trade show, or seminar. We process User Content if you provide it to us at the event. We process this Personal Information to respond to your request, for our Business Purposes.

6. PURPOSES OF PROCESSING

Business Purposes

In addition to the specific processing described above, we typically process Personal Information for several common purposes in connection with our business. Please see below for more information regarding the purposes for which we process your Personal Information.

Operate our Services and Fulfill Obligations

We process any Personal Information as is necessary to provide our Services, and as otherwise necessary to fulfill our obligations to you, e.g. to provide you with the information, features, products, and services you request.

Internal Processes and Service Improvement

We may use any Personal Information we process through our Services as necessary in connection with our improvement of the design of our Services, understanding how the Services are used, for customer service purposes, in connection with the creation and analysis of logs and metadata relating to the use of our Site, and for ensuring the security and stability of our Site. Additionally, we may use Personal Information to understand what parts of our Site

are most relevant to users, how users interact with various aspects of our Site, how our Site perform or fail to perform, etc., or we may analyze use of the Site to determine if there are specific activities that might indicate an information security risk to the Site or our users.

Security and Incident Detection

We may process Personal information in connection with our legitimate interest in ensuring that our Site is secure, identify and prevent crime, prevent fraud, and verify or authenticate users/individuals, and ensure the safety of our guests. Similarly, we process Personal information as necessary to detect security incidents, protect against, and respond to malicious, deceptive, fraudulent, or illegal activity. We may analyze network traffic, device patterns, and characteristics, maintain and analyze logs and process similar Personal information in connection with our information security operations and related.

Aggregate Analytics

We process Personal Information as necessary in connection with our creation of aggregate analytics relating to how our Site is used, the pages and content users view, and to create other reports regarding the use and performance of our Site, and other similar information and metrics. The resulting aggregate data will not contain information from which an individual may be readily identified.

Compliance, Safety & Public Interest

Note that we may, without your consent or further notice to you, and to the extent required or permitted by law, process any Personal Information subject to this Policy for purposes determined to be in the public interest or otherwise required by law. For example, we may process information as necessary to fulfil our legal obligations, to protect the vital interests of any individuals, or otherwise in the public interest or as required by a public authority. Please see the data sharing section for more information about how we disclose Personal Information in extraordinary circumstances.

Corporate Events

Your Personal Information may be processed as part of routine corporate operations, as part of corporate reorganizations, or any business transition, such as a merger, acquisition, liquidation, or sale of assets.

7. DATA SHARING

Personal Information we collect may be shared with a variety of parties, depending upon the purpose for and context in which that information was provided. We generally transfer data to the categories of recipients or in connection with specific business purposes, described below.

Co-op Members

We may share Personal Information with our Co-op Members and purchasing associates in connection with our business activities and operations involving our various Co-Op Members, if you express an interest in the products or services of our Co-Op Members, or if our Co-Op member is other involved in the delivery of products or services to you.

Service Providers

In connection with our general business operations, product improvements, to enable certain features, and in connection with our other lawful business interests, we may share Personal Information with service providers or subprocessors who provide certain services to us, or process data on our behalf. For example, we may use third party hosting providers to host our sites or content, third-party payment processors to process transactions, or delivery and installation partners to make sure you receive the product(s) you purchase.

Suppliers and Partners

We may share Personal Information with our Suppliers and Partners and purchasing associates when you purchase products or services fulfilled by those Supplier or Partners, or if you otherwise express an interest in the products or services offered by the Suppliers or Partners in our network. We may share aggregated Personal Information with Suppliers as part of our efforts to improve the products and services offered in the blood donor, supply, and distribution industry.

Social Media Companies

We may share certain Personal Information with social media companies when you interact with BCA on social media. We may allow these third parties to operate through our Site, such as through a social media icon link on our homepage. We do not share Contact Data collected in connection with BCA's marketing communications with these parties.

Public Disclosure

If you post on our community features or otherwise interact with us on social media, your post (and any Personal Information in it, including user or display names) may be made available to the general public. We may share, rebroadcast, or redisplay Personal Information or other information in the post to the extent permitted by the relevant social media service.

Corporate Events

Your Personal Information may be disclosed to a third party in the event that we go through a business transition, such as a merger, acquisition, liquidation, or sale of all or a portion of our assets. For example, Personal Information may be part of the assets transferred, or may be disclosed (subject to confidentiality restrictions) during the due diligence process for a potential transaction.

Affiliates

In order to streamline certain business operations and develop products and services that better meet the interests and needs of our customers and Co-Op Members, we may share your Personal Information with any of our current or future affiliated entities, subsidiaries, and parent companies.

Legal Disclosures

In limited circumstances, we may, without notice or your consent, access and disclose your Personal Information, our correspondence with you, and any other information that we may have about you to the extent we believe such disclosure is legally required, to prevent or respond to a crime, or in the vital interests of us or any person. Note, these disclosures may be made to governments that do not ensure the same degree of protection of your Personal Information as your home jurisdiction. We may, in our sole discretion (but without any obligation), object to the disclosure of your Personal Information to such parties.

8. YOUR RIGHTS & CHOICES

Your Rights

Applicable law may grant you rights in your Personal Information. These rights vary based on your location, state/country of residence, and may be limited by or subject to our own rights in your Personal Information. You may submit requests to exercise rights you may by contacting us as described in the “Contact Us” section above.

Note: We are able to fulfill rights requests regarding Personal Information that we control or process. We may not have access to or control over Personal Information controlled by third parties. Please contact the third party directly to exercise your rights in third party-controlled information.

Verification of Rights Requests

We verify all rights requests to ensure that the individual making the request is authorized to make that request, to reduce fraud, and to ensure the security of your Personal Information. For example, we may require that you verify that you have access to the email on file in order to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the agent’s authority to act on your behalf.

Your Choices

You may have the following choices regarding the Personal Information we process, to the extent required under applicable law:

Consent

If we rely on your consent to our processing of Personal Information, you may withdraw your consent at any time. You may be required to close your account in order to withdraw consent where your consent is necessary to perform essential aspects of our Services. You can withdraw your consent to receive marketing communications by clicking on the unsubscribe link in an email (for email), by adjusting the push message settings for our mobile apps using your device operating system (for push notifications), or for other communications, by contacting us using the information below. To opt-out of the collection of information relating to email opens, configure your email so that it does not load images in our emails.

Email Marketing

You have the choice to opt-out of or withdraw your consent to email marketing communications. You may exercise your choice via the links in our communications.

Cookies & Similar Tech

If you do not want information collected through the use of cookies and similar technologies, you can manage/deny cookies and certain similar technologies using your browser's settings menu. You must opt out of the use of some third party Site directly via the third party.

To learn more about Google Analytics, please click [here](#). To opt-out of Google's analytic services, you may use the [Google Analytics Opt-Out](#), or use your [device's settings](#).

Global Privacy Control (GPC)- Our Site may support certain automated opt-out controls, such as the [Global Privacy Control](#) ("GPC"). GPC is a specification designed to allow Internet users to notify businesses of their privacy preferences, such as opting-out of the sale/sharing of Personal Information. To activate GPC, users must enable a setting or use an extension in the user's browser or mobile device. Please review your browser or device settings for more information regarding how to enable GPC.

Please note: We may not be able to link GPC requests to your Personal Information in our systems, and as a result, some sales/sharing of your Personal Information may occur even if GPC is active. See the "Regional Supplement" section below for more information regarding other opt-out rights.

Do Not Track

Our Site does not respond to your browser's do not track signal.

9. SECURITY

We implement and maintain reasonable security measures to safeguard the Personal Information you provide us. However, we sometimes share Personal Information with third parties as noted above, and though we may take certain measures to help ensure the security of your Personal Information, we do not control third parties' security processes. We do not warrant perfect security and we do not provide any guarantee that your Personal Information or any other information you provide us will remain secure.

10. DATA RETENTION

We retain Personal Information for so long as it is reasonably necessary to achieve the relevant processing purposes described in this Privacy Policy, or for so long as is required by law. What is necessary may vary depending on the context and purpose of processing. We generally consider the following factors when we determine how long to retain data (without limitation):

- Retention periods established under applicable law;
- Industry best practices;
- Whether the purpose of processing is reasonably likely to justify further processing;
- Risks to individual privacy in continued processing;
- Applicable data protection impact assessments;
- IT systems design considerations/limitations; and
- The costs associated continued processing, retention, and deletion.

We will review retention periods periodically and may pseudonymize or anonymize data held for longer periods.

11. INTERNATIONAL TRANSFERS

We operate in and use service providers located in the United States. If you are located outside the U.S., your Personal Information may be processed in the U.S. The U.S. may not provide the same legal protections guaranteed to Personal Information in foreign countries. Contact us for more information regarding transfers of data to the U.S.

12. CHILDREN

Our Services are neither directed at nor intended for use by persons under the age of 13 in the US. We do not knowingly collect information from such individuals. If we learn that we have inadvertently done so, we will promptly delete such Personal Information if required by law. Do not access or use our Services if you are not of the age of majority in your jurisdiction unless you have the consent of your parent or guardian.

13. CHANGES TO OUR POLICY

We may change this Policy from time to time. Please visit this page regularly so that you are aware of our latest updates. Your use of the Site following notice of any changes indicates acceptance of any changes.

14. REGIONAL DATA RIGHTS

US STATES/CALIFORNIA

Scope

This section applies to individuals located in the United States.

U.S. State & California Privacy Rights & Choices

Under the California Consumer Privacy Act (“**CCPA**”) and other state privacy laws, residents of certain US states may have the following rights, subject to regional requirements, exceptions, and limitations.

Confirm.

Right to confirm whether we process your Personal information.

Access/Know.

Right to request any of following: (1) the categories of Personal information we have collected, sold/shared, or disclosed for a commercial purpose; (2) the categories of sources from which your Personal information was collected; (3) the purposes for which we collected or sold/shared your Personal information; (4) the categories of third parties to whom we have sold/shared your Personal information, or disclosed it for a business purpose; and (5) the specific pieces of Personal information we have collected about you.

Portability.

Right to request that we provide certain Personal information in a common, portable format.

Deletion.

Right to delete certain Personal information that we hold about you.

Correction.

Right to correct certain Personal information that we hold about you.

Opt-Out (Sales, Sharing, Targeted Advertising, Profiling).

Right to opt-out of the following:

- If we engage in sales of data (as defined by applicable law), you may direct us to stop selling Personal information.
- If we engage in Targeted Advertising (aka “sharing” of Personal information or cross-context behavioral advertising,) you may opt-out of such processing.
- If we engage in certain forms of “profiling” (e.g. profiling that has legal or similarly significant effects), you may opt-out of such processing.

Opt-out or Limit Use and Disclosure of Sensitive Personal information.

Right to opt-out of the processing of certain Sensitive Data, or request that we limit certain uses of Sensitive Personal information. This right does not apply in cases where we only use Sensitive Personal information where necessary, or for certain business purposes authorized by applicable law.

Opt-in/Opt-out of Sale/Sharing of Minors’ Personal information.

To the extent we have actual knowledge that we collect or maintain Personal information of a minor under age 16 in California, those minors must opt into any sales/sharing of Personal information (as defined under CCPA), and minors under the age of 13 must have a parent consent to sales/sharing of Personal information. All minors have the right to opt-out later at any time.

Non-Discrimination.

California residents have the right to not receive discriminatory treatment as a result of their exercise of rights conferred by the CCPA.

List of Direct Marketers.

California residents may request a list of Personal information we have disclosed about you to third parties for direct marketing purposes during the preceding calendar year.

Remove Minors’ User Content.

Residents of California under the age of 18 can delete or remove posts using the same deletion or removal procedures described above, or otherwise made available through the Services. If you have questions about how to remove your posts or if you would like additional assistance with deletion, contact us using the information below.

We will work to delete your information, but we cannot guarantee comprehensive removal of that content or information posted through the Services.

Submission of Requests

You may submit requests as follows (please review our [verification requirements](#) section). If you have any questions or wish to appeal any refusal to take action in response to a rights request, contact us at privacy@bca.coop. We will respond to any request to appeal within the period required by law.

- You may visit our [Data Rights Request Form](#)
- Contact us via email to our privacy team at privacy@bca.coop
- You may call us at: 844-698-9362. You will be directed to leave a voicemail where you will provide your email address, phone number or address, along with your request.
- You may send mail to our contact us address above with your email address, phone number or address on file, along with your request.

Categories of Personal Information disclosed for Business Purposes

For purposes of the CCPA, we have disclosed to Service Providers for “business purposes” in the preceding 12 months the following categories of Personal information, to the following categories of recipients:

Category of Personal Information	Category of Recipients
Contact Data Device/Network Data General Location Data Identity Data Inference Data Transaction Data User Content	Co-op Members; Suppliers and Partners; Service Providers; Affiliates; Legal Disclosure
Audio/Visual Data	Co-op Members; Suppliers and Partners
Biographical Data Payment Data	Service Providers; Legal Disclosure

Categories of Personal Information disclosed for Targeted Advertising/Data Sharing

None.

Categories of Sensitive Personal Information Used or Disclosed

For purposes of CCPA, we may use or disclose the following categories of Sensitive Personal Information: Government ID Data; Payment Data. However, we do not sell or share Sensitive Personal Information, or use it for purposes other than those listed in CCPA section 7027(m).