

Privacy Policy

Last Updated/Effective Date: June 22, 2023

This Privacy Policy (“**Policy**”) describes the Personal Information collected by or on behalf of Toolbox Assessments, Inc. (“**Toolbox Assessments**,” “**we**,” “**us**,” or “**our**”) through the NIH Toolbox website available at NIHToolbox.org and MobileToolbox.org (“**Sites**”) and NIH Toolbox mobile application (“**App**”) (collectively referred to herein as the “**Platform**”), and how Personal Information is used, protected and shared. If you have questions or concerns about this Policy, please contact us as set forth below.

We may modify this Policy at any time. All changes will be effective immediately upon posting to the Site. Material changes will be conspicuously posted on the Site or otherwise communicated to you.

If you use the Platform, you must comply with our Term of Use (“**Terms**”).

We Collect Data You Provide

Personal Information. If you provide data that personally identifies you such as your name, e-mail address, phone number, education and career background, and licensure information (“**Personal Information**”), we will collect, use, and share such Personal Information pursuant to this Policy and applicable law. Personal Information is required to use certain features of the Platform, for example, to create an account on the Site, to unlock certain content on the Platform, or contact us via email, phone, or our Contact Us form (where we may retain your message’s content and our response).

Access to Content. To create an account, you must create log-in credentials such as a username and password. In order to have access to certain restricted content on the Platform, you are required to provide certain Personal Information to enable us to verify your identity, such as your name, CV, and licensure information.

Marketing Communications; Email Opt-Out. If you provide your email address to us, you understand that we may send you emails, including marketing emails. We may use third-party providers to deliver communications to you. You may opt-out of marketing emails by using the unsubscribe link in the email or contacting us at ToolboxAssessments@gmail.com with “Unsubscribe” in the subject line. Opting out of marketing communications does not opt you out of communications about your account.

Feedback. When you provide comments or feedback about our Site, the content on the Site, or our products or services (“**Feedback**”), we will not treat that Feedback as confidential and we may use that Feedback for any purpose in our sole discretion so long as it does not personally identify you. Feedback will be used without attribution or compensation to you.

Data Automatically Collected

Account Activity. We may collect data about how you use (i) your online account, and (ii) the Site when you are logged into your account.

Cookies & Other Tracking Technologies.

What types of online tracking mechanisms do we use? We may use cookies, web beacons, pixel tags and other tracking technologies (collectively “**Cookies**”) on our Site.

What are cookies and web beacons / pixel tags? A cookie is a small text file that our Site saves onto your computer or device when you use the Site that provides us certain information about your activities. Cookies allow the Site to remember your actions and preferences and recognize you or your browser, along with some information you provided. Web beacons / pixel tags are small graphics on a webpage that monitor your activity when viewing a webpage.

Why do we collect Cookies? We use Cookies to:

- make our Site function properly;
- provide personalized experiences;
- tailor our interactions with you;
- help with our marketing efforts;
- provide us with valuable data and statistics about the usage and effectiveness of our Site and to help us improve our Site; and
- help us improve our services.

What type of information do Cookies collect? The Cookies on our Site may collect information such as:

- IP addresses assigned to the computers and other devices you use;
- your internet service provider;
- device ID number;
- approximate geographic location;
- browser type;
- Site pages visited;
- websites you access before and after visiting the Site, and
- data related to how and when you use the Site.

We may combine information from Cookies with other Personal Information.

How long do Cookies last? A Cookie can either be a “session” Cookie or a “persistent” Cookie. Session Cookies exist only for so long as you are visiting the applicable Site and are typically deleted when you exit your web browser. Persistent Cookies exist for a set period of time, for example, up to several months or years. Each time you visit a Site that has implemented a persistent Cookie, the persistent Cookie is renewed and that Cookie will remain active until its predetermined expiration date. You can manually delete persistent Cookies through your browser settings.

First and Third-party Cookies. Cookies may either be “first-party” or “third-party” Cookies. A first-party Cookie allows your web browser to talk to the actual Site that you are visiting (i.e. this Site). A third-party Cookie allows your web browser to talk to a third-party website, such as the source of an ad that appears on the website you are visiting or a third-party analytics provider. We may not have control over how a third-party uses information collected through third-party Cookies.

How do you manage Cookies or opt-out? Most browsers automatically accept cookies. You can disable this function by changing your browser settings, but disabling cookies may impact your use and enjoyment of the Site. Not all features or functions of the Site may work properly if you disable Cookies. You cannot disable all Cookies, such as Cookies that are essential to the functioning of the Site.

CALIFORNIA'S "DO-NOT-TRACK" REQUIREMENT. WE CURRENTLY DO NOT HONOR “DO NOT TRACK” REQUESTS.

Google Analytics. We use Google Analytics to collect and process information about your use of the Site. Google sets cookies on your browser or device, and then your web browser will automatically send information to Google. Google uses this information to provide us with reports that we use to better understand and measure how users interact with our Site.

To learn more about how Google uses data, visit [Google's Privacy Policy](#) and Google's page on "[How Google uses data when you use our partners' sites or apps](#)." You may download the [Google Analytics Opt-out Browser Add-on](#) for each web browser you use, but this does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit [Google Analytics Cookie Usage on Websites](#).

How We Use Personal Information. We use Personal Information for the following purposes:

As Stated or Agreed to at the Point of Collection. We may use Personal Information for the purposes stated or agreed-to (or as is obvious) at the point of collection. For example, we use Personal Information to respond to your questions, comments, or complaints. We may also use Personal Information as requested or consented to by you.

Administration. We use Personal Information for administrative purposes, such as managing your accounts, to inform our business strategies, and to understand the Platform's demographics and user preferences.

Identity Verification. We use Personal Information in certain cases to run professional background checks and verify your identity and medical licensure information before providing you access to certain content on the Platform.

Site Management. We use Personal Information for Platform management, such as troubleshooting problems, improving the content and functionality of the Platform, statistical and other analyses of the Platform, and to customize the Platform to you and our users.

Communications. We may use Personal Information to send to notify you of new services, products or programs, to notify you of new features of our Platform, to notify you of changes to our Terms or this Policy, and for other similar communications.

To Protect Our Rights. We may use Personal Information to protect our legal rights or interests, or those of other parties, including to bring a legal action against you or anyone who may be causing harm to us, our Site, or to other users of the Site. We may also use Personal Information to seek business, financial or legal advice, and to respond to other legal requests.

Retention of Personal Information

We will keep Personal Information for the period necessary to fulfil the purposes described in this Policy, unless a longer retention period is permitted or required by law.

Disclosure of Personal Information

We do not sell, rent or lease Personal Information to any third party. We may share Personal Information with the following parties, in compliance with applicable laws:

Employees and Affiliates. We may share Personal Information with our employees and affiliates who have a need to know the information for our business purposes.

Service Providers. We may share Personal Information with service providers that provide services for us. For example, we may share Personal Information with vendors to help us host and manage the Site; provide targeted advertising and other marketing; improve the content and functionality of the Site; perform data analysis and statistical analysis; troubleshoot problems with the Site; provide payment processing services and online storefronts; provide public relations; assist with customer service; provide learning management systems; provide email services; provide data processing; and support or provide the security of the Site.

Government Officials/Law Enforcement. We will cooperate with law enforcement and other governmental agencies, and may disclose Personal Information: (i) if we believe in good faith we are legally required to disclose that Personal Information, (ii) if we are advised to disclose Personal Information by our legal counsel, or (iii) when necessary to identify, contact or bring a legal action against someone who may cause or be causing harm to, or interfering with the legal rights of, Toolbox Assessments or any other party.

Professional Advisors. We may share Personal Information with our professional advisors, such as our attorneys, accountants, financial advisors and business advisors, in their capacity as advisors to Toolbox Assessments.

Change in Ownership. In the event Toolbox Assessments is the subject of a change of control or in the event the Site changes ownership, in whole or in part, or in the event of a bankruptcy, receivership or a similar transaction, we may provide Personal Information to the subsequent owner(s).

Other. We may share Personal Information with third parties when explicitly requested by or consented to by you, or for the purposes for which you disclosed the Personal Information to us as indicated at the time and point of the disclosure (or as was obvious at the time and point of disclosure).

Use and Disclosure of Non-Personal Information.

Toolbox Assessments may collect, use, share, transfer and otherwise process de-identified and aggregated information that it receives or creates for any purposes in its sole discretion, in compliance with applicable laws. Toolbox Assessments is the sole and exclusive owner of such de-identified and aggregated information, including if Toolbox Assessments de-identifies Personal Information so that it no longer considered Personal Information under applicable laws.

Children Under 18.

The Platform is not directed at children under 18 years of age. We do not knowingly collect, use, or share Personal Information from children under 18. If a parent or legal guardian learns that their child provided us with Personal Information without his or her consent, please contact us and we will make commercially reasonable attempts to delete such Personal Information.

Data Security

We use commercially reasonable technical and organizational measures to help secure Personal Information against loss, misuse, and alteration appropriate to the type of Personal Information processed. If a breach of your Personal Information occurs, we will notify you of the breach if required under applicable law.

YOU UNDERSTAND THAT NO DATA TRANSMISSION OVER THE INTERNET OR DEVICE CAN BE GUARANTEED TO BE 100% SECURE. WHILE WE STRIVE TO PROTECT PERSONAL INFORMATION, WE DO NOT GUARANTEE

THE SECURITY OF PERSONAL INFORMATION AND YOU PROVIDE PERSONAL INFORMATION AT YOUR OWN RISK.

Access from Outside the United States

If you access the Site from outside the United States, please be aware that Personal Information may be transferred to, stored in, and processed in the United States. Certain governmental authorities may not consider the level of protection of Personal Information in the United States to be equivalent to that required by the in other jurisdictions.

Third-Party Websites

The Site may link to, or be linked to, websites not controlled by us. We are not responsible for third-parties' privacy policies or practices. This Policy does not apply to any third-party websites or to any data that you provide to third parties. You should read the privacy policy for each website that you visit.

Access & Update Your Personal Information

To access or update your Personal Information as it exists in our records, please visit any accounts you have created or contact us using the information below.

International Use of the Site

This Site is hosted in the United States. As a result, the Personal Information that we collect and generate about you may be transferred, stored, or accessed in a destination outside of your country which may have less strict, or no, data protection laws, when compared to the laws in your country. Any transfers of Personal Information outside your local country will be conducted in compliance with the international data transfer restrictions that apply under applicable data protection laws.

California Residents

Pursuant to California Civil Code Section 1798.83, if you are a California resident, you have the right to obtain: (a) a list of all third parties to whom we may have disclosed your Personal Information within the past year for direct marketing purposes, and (b) a description of the categories of Personal Information disclosed, by emailing us at ToolboxAssessments@gmail.com.

Contact Us

If you have questions or concerns regarding this Policy, contact us at:

Toolbox Assessments, Inc.
605 N. Michigan Ave, 4th floor
Chicago, IL 60611
Attention: Julie Hook
Phone Number: (773) 242-9130
Email: ToolboxAssessments@gmail.com