



Policy Manual

Approved by Board of Directors, December 2025

Policy Manual

Last Revised: December 2025

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Overview

The Neurocritical Care Society (NCS) Policy Manual establishes the formal governance, operational, and ethical framework that guides the Society’s leadership, volunteers, members, and organizational partners. It exists to ensure consistency, accountability, transparency, and alignment with the mission and values of NCS. The policies contained apply to all members, including the Board of Directors, committees, staff, volunteers, and individuals acting in an official capacity on behalf of NCS. All policies are binding and intended to support efficient and scalable operations across Society activities.

1. Governance Policies

These policies outline the responsibilities, authorities, and procedures of the Board of Directors and leadership roles:

- Election and nomination processes for Board and Officer roles
- Term limits and leadership eligibility
- Committee formation, expectations, and reporting structure
- Conflict of interest and anti-harassment requirements
- Leadership Code of Conduct and standards of professionalism

2. Membership Policies

Membership policies define eligibility, rights, responsibilities, category management, disciplinary actions, and recognition. It sets expectations for:

- Dues structures and renewals
- Code of conduct compliance
- Termination or disciplinary review procedures
- Global partnerships and chapter formation requirements

3. Financial Policies

These policies ensure fiduciary responsibility and long-term sustainability. They include:

- Budget preparation, review, and approval standards
- Invoice and check authorization thresholds
- Reserve fund and investment management structure
- Signing, contracting, and reimbursement authority
- Travel reimbursement standards for volunteers and staff

4. Communications and External Affairs

This section governs how members and leaders represent NCS publicly, including:

- Authorized external spokesperson roles
- Social media conduct and brand protection
- Sponsorship and advertising acceptance criteria
- Artificial intelligence use, ethical considerations, and recording protocols

5. Privacy Policies

The privacy section outlines requirements for safeguarding personal and confidential information. This section addresses:

- Data collection, sharing, and storage
- Member rights and international data compliance (GDPR and related frameworks)
- Data retention, deletion, and incident response
- Use of third-party vendors and technology platforms

Section I: Governance Policies

Election, Voting and Leadership Policies

This policy outlines the process by which the Board of Directors is selected, ensuring compliance with board composition and term requirements. It includes nominations, ballot preparation, vote tallying, and announcements. It applies to both designated and member-at-large positions.

Nomination Process and Timeline

The Nominating Committee evaluates Board membership and identifies terms expiring at the next annual meeting. The nominating committee begins to assemble by end of February, with the call for nominations beginning in March, the voting period concluding by the last regular Board meeting before the Annual Meeting. Open designated and at-large director seats are communicated in the call for nominations.

The Nominating Committee ensures appropriate designated seats for two international, one physician, one nurse/advanced practice provider and one pharmacist are represented among nominees. Nominees from any discipline are eligible for at-large seats.

Preparation of Slate

The Nominating Committee reviews candidate materials and scores them using an agreed rubric that shall be reviewed at least annually by the Executive Committee. Candidates with top scores are placed on the ballot. At least one candidate is placed on the ballot for each open seat. Every effort should be made to ensure the ballot reflects multidisciplinary membership composition.

Relevant information is communicated to the membership regarding the member-at-large job description, eligibility criteria, recommended experience desired and application requirements with posted deadline for submission.

Annual calls for nominations will require candidates to complete an application form, provide a CV, personal statement, letters of recommendation, conflict-of-interest form, and headshots. NCS staff will verify completeness and eligibility before submission to the Nominating Committee.

Voting and Selection of Directors-at-Large

The Board-approved slate is communicated to members two weeks prior to the voting period. All candidate names appear alphabetically with supporting materials. All members in good standing may vote, which occurs electronically. The voting period is two weeks. NCS staff report results to the Nominating Committee and Board. Candidates with the highest vote counts are elected; in case of a tie, the Board of Directors shall cast their votes and determine the winning candidate.

Directors elected to fill vacancies shall serve until the next annual meeting, at which the election of Directors is in the regular order of business, and until their successors are elected and have been qualified.

Announcement of Results

Newly elected directors-at-large are announced to the membership, and staff update rosters and website listings.

Term Limits and Related Issues

Per the Bylaws, all Directors serve 3-year terms. Directors rotating off may not stand for re-election the same year; a one-year hiatus is required. Maximum of two terms per Board member. Past Presidents are

ineligible for re-election to the Board. International director candidates will be required to be a member of a global regional partner or International Council.

Nominating Committee Responsibilities

The Nominating Committee is responsible for reviewing applications and recommending candidates. NCS staff ensures application completeness and eligibility and informs newly elected members that they may attend the Board of Directors Annual meeting as nonvoting members.

Secretary Nomination and Election Policy

This policy applies to all eligible candidates for Secretary. All eligible candidates submit materials by the designated deadline. The Nominating Committee conducts interviews of the final selected candidates.

Nomination Timeline and Process

The timeline for call for Secretary nominations begins in January with the vote for Secretary conducted by the last regular Board meeting before the Annual Meeting.

The Secretary term begins immediately following the Opening Session at the Annual Meeting. He/she may attend the Board of Directors Annual meeting as a nonvoting member.

Voting members of the Board of Directors will submit nominations for Secretary to the Nominating Committee. Secretary candidates must be currently serving on the Board or have previously served.

Criteria to be used for the selection of these candidates and a description of the 5-year officer duties will be made available for review.

Secretary candidates will be provided with a list of materials such as the officer roles and responsibilities, board meeting dates, the rubric for vetting candidates and list of required materials to be submitted for candidate consideration, as well as the deadline for submission of all materials.

Conflicts of Interest Policy

This policy applies to all Board members. An annual conflict-of-interest disclosure is required. Conflicts must be disclosed:

1. Before voting on related matters.
2. Before entering contracts or transactions.
3. As soon as the conflict becomes known.
4. On annual disclosure forms.
5. Board may require recusal from discussions or voting.

The Board chair may require disclosure of potential conflicts as part of a Board meeting, and any disclosures will be recorded in minutes.

Committees, Sections, and Task Forces

The Board may create such NCS committees as it may deem desirable. Each committee shall include at least three (3) members, of whom at least one (1) shall be a Director and serve as the liaison to the Committee. Committee members shall be appointed by the President, except for the Past President's Council, in which the Immediate Past President shall serve as Chair. Such committees shall be advisory only. Committees as deemed necessary by the President and special ad hoc Task Forces may be established from time to time.

All committees and Task Forces report to Board of Directors. Committees recommend actions but do not have binding authority unless delegated by the Board.

Committees must have charters outlining their purpose, responsibilities, membership criteria, terms, and leadership structure. Charters may be revised periodically but must be approved by the Board of Directors.

Standing committees will continue to exist indefinitely at the discretion of the Board of Directors. When, in the judgment of the Board, a committee is no longer necessary, it may be discharged by majority vote of all Board of Director members.

To ensure diversity, chairs should consider volunteer gender, ethnicity, tenure in a role, geographic area of practice, and institution type (academic, community, size), as well as professional discipline.

Committee chairs are selected from current committee members; the Chair-Elect serves a two-year term and succeeds outgoing Chair. As deemed necessary from time-to-time, and will approval of the President, some committees may have more than one Chair and/or Chair-elect. Committee members are approved by the President at the beginning of their term; committee member term is four years.

Task Force members are appointed by the President with a defined charge; discharged after task completion or at the end of the President's term.

Leadership sections are developed to serve NCS members with similar interests related to neurocritical care. Sections serve to advance the specialty through unique projects, advocacy, and educational programming. Chair-Elect of each section are appointed by the President for a 1 year term with maximum of two terms. NCS members can choose to join any of the sections annually when renewing membership. One BOD Director At-Large will be assigned by the President on annual basis to serve as the Board Representative.

Members wishing to form a new section will complete an application including the development of a charge and gain signatures of 20 NCS members interested in participating in the Section. Applications are approved by the BOD.

Leadership Code of Conduct Policy

This policy applies to all Officers, Board Directors, Committee Chairs, and members. All Board and committee members must sign a Leadership Code of Conduct annually, which prohibits harassment, discrimination, and conflicts of interest.

Anti-Harassment and Non-Discrimination Policy

NCS is committed to promoting a professional, respectful, inclusive, and safe environment for its members, partners, and stakeholders. This policy applies to Board members, committee members task force members, staff, contractors, and event participants.

Definitions

Harassment – unwelcome verbal, written, or physical conduct.

Sexual harassment – unwanted advances, comments, or physical conduct of a sexual nature.

Discrimination – denying access based on protected characteristics.

NCS strictly prohibits harassment and discrimination of any kind . Reports of harassment or discrimination may be made confidentially to leadership (Executive Director and/or Board members). The Board will

ensure complaints are investigated promptly, thoroughly, and impartially, and will ensure the protection and anonymity of the complainant. Any form of retaliation will not be tolerated. The Board will take corrective actions which may include verbal and/or written warnings, removal from a meeting or NCS event, or membership termination.

Director/Officer Insurance and Conference Cancellation Policy

This policy ensures compliance with Bylaws requiring officer indemnification, including maintaining Director and Officer liability, along with conference cancellation insurance.

Section II: Membership Policies

Membership Categories

This policy outlines dues collection, membership renewals, and policies for adding, changing, or eliminating membership categories.

General Membership

Individuals meeting membership criteria may apply by completing an application and paying dues set by the Board of Directors approved NCS budget and published on NCS website. Member applicants must agree to abide by the NCS code of conduct and policies.

Membership fees shall be determined and approved annually by the Board. Membership application timelines and dues payment methods are published on NCS communication channels.

Members have rights (voting, access to NCS overall financials and program) and benefits such as access to networks and educational opportunities as outlined in the Bylaws Article II. Member responsibilities (code of conduct, dues payment) as defined in the Bylaws and per NCS policies. Membership may be suspended or terminated for:

1. Violations of the code of conduct
2. Non-payment of dues
3. Other criteria as defined in NCS Bylaws.

Special Recognitions and Awards

The Society may recognize members for exceptional service, academic excellence, and leadership. Examples include Fellow of Neurocritical Care Society (FNCS), Lifetime Achievement Award, and other honors. No officer shall be eligible for an award/recognition, other than the FNCS designation or Lifetime Achievement Award.

Adding or Changing Membership Categories

Considerations for adding or changing membership categories include strategic alignment, member needs, financial and operational impact, and legal/ethical factors. The Board of Directors must approve any changes via majority vote. If changes affect existing classes, bylaws amendment is necessary. Any approved membership category changes must be published and integrated into operations.

Disciplinary Policy

All members are required to comply with the NCS Code of Conduct or Leadership Code of Conduct. Grounds for Disciplinary Action include:

- Violation of Bylaws or Policies.
- Willful falsification of membership information.
- Professional/personal misconduct impacting the NCS, per Code of Conduct or Leadership Code of Conduct, or the harassment/discrimination policy.
- Conviction of a felony or crime related to medicine, nursing, pharmacy, or allied health.
- Failure to cooperate with disciplinary process.

Enforcement

Members found in violation may face membership revocation following an investigation by the Board of Directors or its designees.

International Partnerships

The NCS has 5 International Regional Chapters in the following regions: Asia (1), Europe (not an official partner as of December 2025) (2), Mid-East/Africa (3), North & Central America (4), and South America (5). Each Regional Committee will be comprised of representatives from partnering organizations, called Global Partners. The international partnerships are overseen by the International Council, which reports to the BOD. The international council is led by the Immediate Past President and includes the leaders of the regional chapters and other NCS past presidents.

Definitions

Chapter – formally recognized subdivision operating under NCS bylaws and policies

Petitioners – members in good standing requesting chapter formation
Charter Agreement – written agreement outlining chapter rights and responsibilities.

Eligibility Requirements

- Focus on Neurocritical Care
- Minimum of twenty-five members. At least five members must be active NCS members or become active NCS members in due course.
- International scientific or practice networks may also be considered in lieu of a formal society to accommodate local practices.

Petition Process

1. Letter of Intent – purpose and member base,
2. Formal Petition – signatures, draft bylaws, leadership slate, and first-year goals
3. Review – Board reviews petition for completeness.
4. Board Approval – Board votes on provisional or full chapter status.

Charter Agreement

Society retains ownership of name, logo, and branding. Chapter agrees to bylaws, policies, and financial reporting for any chapter support provided of up to \$5,000.

Chapters include a charter with information regarding members, activities, leadership criteria and selection, along with maintaining minimum membership threshold. Regional chapters will submit yearly reports to the International Council and provide informal communication with the International Council on an as-needed basis. The International Council will report to the BOD on a routine basis.

Provisional Status

Requirements:

1. Hold at least two meetings/events per year.
2. Demonstrate sustainability.

Dissolution

Chapter may be dissolved if:

1. Membership threshold is not maintained.
2. Activities inconsistent with mission or policies
3. Board may revoke recognition at any time for cause.

Support from the Society

- A. Use of name and logo in compliance with branding
- B. Inclusion in directory and website
- C. Access to resources, templates, and staff support
- D. Collaboration on programs and advocacy initiatives

Whistleblower Policy

This Whistleblower Policy provides a means for directors, officers, staff, and volunteers of NCS to raise good-faith concerns about behavior that is or appears to be illegal, fraudulent, dishonest, unethical, inappropriate or in violation of any adopted NCS policy (a "Suspected Violation"). The policy applies to:

- A. Board officers
- B. Board members
- C. Volunteers
- D. Staff of NCS

NCS has voluntarily adopted a whistleblower protection policy. Pursuant to this policy, any member or staff who becomes aware of any violation of federal, state, or local law or regulation, including any financial wrongdoing, should immediately report the violation to the Executive Director, Board President, or other NCS leadership to allow the organization to investigate and, if applicable, correct the situation or condition. NCS requires all directors, officers, staff, and volunteers to observe the highest standards of business and personal ethics. This policy applies to all representatives who must practice honesty and integrity in fulfilling their duties and comply with all applicable laws, regulations, and NCS policies.

NCS encourages individuals to report any instances where these standards may be compromised.

Definitions

Whistleblower – A director, officer, staff member, or volunteer reporting a Suspected Violation under this policy.

Suspected Violations may include, but are not limited to:

1. Violations of federal, state, or local laws or regulations
2. Fraudulent financial reporting or actions that may lead to such reporting.
3. Providing false information or withholding material information from NCS auditors
4. Destroying, altering, concealing, or falsifying documents intended for official proceedings.
5. Planning, facilitating, or concealing any of the above

6. Violations of conflict of interest, ethics or behavior as outlined in this document.
 This list is illustrative and not exhaustive; the policy also covers actions that have not yet occurred but should be taken to comply with law or NCS policies.

Reporting Responsibility

Complaints of Suspected Violations may be submitted anonymously to the Executive Director or Board President. Anonymous reports should provide as much detail as possible to facilitate investigation. If the executive director is believed to be in violation, a report may be shared with the Board and/or NCS independent legal counsel.

Enforcement

The Executive Director and Board President are responsible for investigating and overseeing resolution of reported complaints. Investigations will be conducted confidentially, to the extent permitted by the needs of the investigation and appropriate action will be taken within a reasonable period following investigation.

If a member, volunteer, or staff person becomes aware of suspected legal, financial, or ethical misconduct, the following process applies:

1. Primary Reporting
 - a. Report concerns to the Executive Director or Board President.
2. If the Concern Involves the Executive Director, Board President, or Other Senior Leader
 - a. Report to the Ethics Committee Chair
 - b. If unavailable or conflicted, report to the Immediate Past President.
3. Investigation
 - a. The receiving member will coordinate a confidential review and may engage external legal counsel or an independent investigator.
 - b. Any individual named in the complaint will be excluded from the review process.
4. Documentation & Resolution
 - a. Findings and actions will be documented and reported to the Board, excluding any conflicted parties.

Acting in Good Faith

Individuals filing complaints must act in good faith and have reasonable grounds for believing the information may indicate a Suspected Violation. Allegations made maliciously or knowingly false are considered a serious disciplinary offense.

No Retaliation

No director, officer, employee, or volunteer who reports a Suspected Violation in good faith or cooperates with an investigation shall suffer intimidation, harassment, discrimination, or other retaliation.

Any individual found retaliating against a whistleblower is subject to disciplinary action, up to and removal from volunteer or leadership roles or membership revocation.

Policy on the Use of Generative Artificial Intelligence

The purpose of this policy is to provide a clear framework for the responsible, ethical, and secure use of generative artificial intelligence (AI) technologies within the operations and activities of the Neurocritical Care Society (NCS). As the adoption of AI tools becomes increasingly prevalent in professional and clinical

settings, it is critical that NCS has established protocols that uphold member confidentiality, intellectual property rights, informed consent, and the integrity of its governance and communication process.

This policy applies to all individuals involved in NCS activities, including staff, volunteers, board members, committee and section chairs, contractors, and any affiliated individuals or entities acting on behalf of the Society.

Definition

For the purposes of this policy, generative artificial intelligence refers to technologies that can create human-like content—including text, audio, video, summaries, and visual media—using advanced algorithms and machine learning models. Examples include, but are not limited to, tools such as ChatGPT, Otter AI, Google Gemini, Microsoft Copilot, and similar AI-enabled platforms.

Unauthorized Recording Prohibited

Individuals (including NCS members, committee participants, and external collaborators) are prohibited from recording meetings or other NCS-hosted discussions using any generative AI-enabled tools or services, unless expressly authorized. This policy shall be communicated to all individuals named above on at least an annual basis, or when new individuals are onboarded.

This prohibition includes, but is not limited to, the use of AI-powered transcription services, AI note-taking bots in virtual meetings, and AI-enhanced audio/video recording platforms.

Authorized Recording by NCS Staff

NCS staff may record selected meetings using approved technology, provided they adhere to a predesignated protocol that includes:

1. Clear disclosure to participants that recording will occur.
2. Obtaining verbal or written consent from participants prior to the recording.
3. Ensuring compliance with data privacy and retention standards.
4. Providing access to the resulting summaries or transcripts when appropriate.

NCS staff may delegate the authority to initiate recordings and follow the approved consent protocol to Committee or Section Chairs, provided that a request is submitted and approved in advance and the Chair agrees to follow the same standardized consent and disclosure procedures outlined for staff.

Data Security, Confidentiality, and Use Limitations

All recordings, transcripts, and outputs generated through authorized AI tools must be treated as confidential and proprietary NCS information.

Use of AI-generated content (e.g., summaries, minutes, educational materials) must be:

1. Factually accurate and reviewed for errors or bias.
2. Approved by the appropriate NCS staff or volunteer leadership before distribution.
3. Not used for clinical decision-making, legal documentation, or advocacy statements without formal review.

Compliance and Oversight

Violations of this policy may result in disciplinary action, including removal from committee participation, revocation of access to NCS systems, or other consequences as determined by the Executive Director or Board of Directors. Questions or requests for clarification should be directed to the NCS Executive

Director or their designee.

Reference Policy

This policy incorporates by reference the Smithbucklin Artificial Intelligence Use Policy (Version: October 31, 2023), which governs AI use by staff supporting NCS through Smithbucklin. NCS staff are expected to adhere to both the Smithbucklin policy and this NCS-specific guidance.

NCS Events Code of Conduct

NCS is committed to creating a welcoming, respectful, and safe environment for everyone at all events. This policy outlines behaviors that will not be supported or tolerated by any attendee.

This policy applies to all attendees, including speakers, sponsors, exhibitors, volunteers, staff, and general participants. Failure to comply with this policy may result in expulsion from the event without a refund, and future attendance may be prohibited. Revocation of membership may also be a consequence, depending on the seriousness of the incident.

Expected Behavior

All attendees are expected to:

- Demonstrate respectful and considerate behavior toward all participants.
- Maintain a safe and inclusive environment free from harassment, discrimination, and offensive behavior.
- Respect the opinions, ideas, and perspectives of others.
- Use appropriate language and refrain from derogatory or discriminatory language or slurs.
- Communicate in a respectful and professional manner, free from personal attacks or insults.
- Avoid statements, comparisons, or presentations that could negatively impact an exhibitor’s business or reputation.
- Respect the personal space and physical boundaries of others.
- Report any violations of this Code of Conduct to event organizers.
- Refrain from the excessive use of alcohol to the point of intoxication. NCS has a strict no-illicit drugs policy.

Unacceptable Behavior

The following behaviors are strictly prohibited and may result in immediate expulsion from the event:

- Harassment, discrimination, or bullying based on personal characteristics such as gender, sexual orientation, disability, race, ethnicity, religion, or any other characteristic.
- Intimidation or threats toward any individual or group
- Physical or verbal abuse, assault, or aggressive behavior
- Use of derogatory or discriminatory language or slurs
- Sexual harassment, including unwanted sexual advances, comments, or gestures.
- Invasion of personal space or boundaries, such as unwelcome touching or standing too close
- Disruption of sessions or activities, including heckling or interrupting speakers

- Damage to property or theft of materials or belongings
- Use of cameras or recording devices to capture images, video, or audio of event sessions, speaker presentations, or performances without authorization
- Destruction or vandalism of personal property or event site materials
- Possessing and consuming open alcoholic beverages outside designated event areas or receptions
- Excessive use of alcohol to the point of intoxication, or any illicit drug use.
- Any violation of applicable state or local laws

Reporting Violations

Individuals who experience or witness any behavior that violates this Code of Conduct should report it immediately to a conference staff member or organizer. All reports will be taken seriously, and appropriate action will be taken. Reports will be kept confidential to the extent possible.

Section III: Financial Policies

The Executive Director, with input from committee chairs and other society volunteer leaders, will prepare an annual operating budget for the Board of Directors to review and approve. The NCS fiscal year runs from January 1 through December 31st. The budget shall contain revenue and expenses for programs, projects, and activities that advance its mission and vision.

Budget Amendments

There may be occasion within the fiscal year for adjustments or budget exceptions to meet the operations of society. The Executive Committee has the authority to approve budget exceptions of up to \$10,000. Budget exceptions over \$10,000 will be submitted in writing to the Board of Directors for full board review, vote, and approval. All budget exceptions are to be recorded in minutes and maintained in the records per any record retention policy.

Invoice and Check Approvals

The Executive Director has the authority to approve all Society invoices and checks up to \$10,000 without approval. The Treasurer will review all Society invoices totaling over \$10,000. Once approved, the management company will submit payment.

Financial Statements and Reporting

The Executive Director will prepare monthly financial statements and documents for NCS Executive Committee and Board of Directors. The Executive Director will ensure all relevant IRS and state financial reporting are completed. An independent audit will be performed at the end of each fiscal year. A report on the audit will be made to the general membership at the Annual Business Meeting (copies will be available to members upon request).

Signing Authority Policy

The Board President/Chair and the Chief Executive Officer/Executive Director (CEO/ED) may sign budgeted or board approved contracts, agreements, or other financial transactions on behalf of the Association for budgeted. The CEO/ED has signing authority for vendor and related hotel contracts. Any delegation must include clear limits and be documented.

Financial Reserve Policy

This policy applies to the Board of Directors, Executive Director and relevant financial advisors entrusted with the society's financial performance.

Definition of Reserves

Reserves are defined as the accumulated net surpluses of the Society, i.e., the unrestricted net assets as reported on the audited financials.

The Society shall have a goal of maintaining reserves of no less than sixty-five percent (65%) of annual budgeted expenses over a three-year period. In the event the goal of 65% of annual operating expenses is not achieved and reserves are less than 60% of average annual operating expenses, the Treasurer shall notify the Executive Committee of a variance. If reserves are greater than 65% or up to 80% of operating expenses, 50% of the net income should be added to reserves. The remaining net income will be subject to Executive Committee recommendation to align with short- and long-term goals. If/when reserves are below 60%, the Executive Committee may direct the Executive Director to put a cap on any new project funding or special initiative funding through the reserves. This occurrence would trigger a process through which a Task

Force would convene to recommend necessary and sufficient corrective actions to pursue a recovery plan by:

1. Using next year's budget surplus sufficient to rebuild the reserves' floor to a minimum of 60% of annually budgeted expenses, or
2. Use a two-year budget cycle to rebuild the reserves' floor to a minimum of 60% of annually budgeted expenses.

In either case, the recommendations shall be presented to the Executive Committee for immediate action.

The above funding requirements may be amended from time to time with approval of the Board of Directors.

Investment Policy

The NCS sets this Statement of Investment Policy forth to 1) define and assign the responsibilities of all involved parties, 2) establish a clear understanding of the investment goals and objectives for NCS assets, and 3) provide guidance and limitations to the investment manager regarding NCS assets. In general, the purpose of this Statement is to outline the philosophy, which will guide investment management of the assets toward NCS's desired results. It is intended to be sufficiently specific to be meaningful, yet flexible enough to be practical.

NCS reserve funds are managed by the Board-appointed investment manager in collaboration with the Treasurer, Officers and Executive Director. The NCS Treasurer, in collaboration with the Executive Director, is responsible for monitoring and evaluating the performance of NCS' investments and reporting regularly to the Board of Directors by meeting with the board-appointed investment manager.

Investment Assets

For purposes of these policies, investment assets are those assets of the NCS which are available for investment in a variety of asset classes to include US and Non-US public securities such as stocks, bonds, intermediate structures (mutual funds, hedge funds, etc.), other investments, and cash or cash equivalents, heretofore to be referred to as the "Fund."

Investment Consultant, Advisors, and Agents

The Board of Directors is specifically authorized to retain one or more investment Consultants and/or Advisors as well as any administrators, custodians, or other investment service providers required for the proper management of the NCS's Fund and investments.

The Treasurer and Executive Director, in consultation with the Society's selected investment manager, are responsible for managing investments consistently with the BOD-approved investment policy. It is the responsibility of these two individuals to keep the Executive Committee and the full Board informed of all financial decisions and provide them with all information related to the Society's financial health.

All investments shall be reviewed 1) monthly by the Treasurer, and Executive Director; and 2) quarterly by the Executive Committee. The Executive Committee must authorize any changes in the fund account investments. The investment policy will be re-evaluated at least annually. Quarterly and annual reports should include comparisons to appropriate benchmarks, as advised by the NCS investment manager.

The Treasurer, in consultation with the Board, Executive Director, and investment manager, will periodically determine the allocations to each tier based on prior years' cash-flow and reserve levels as

well as anticipated future spending. In making these allocations, they may rely on the cash flow projections of the designated financial officer.

Asset Allocation and Diversification

NCS will strive to maintain an adequate level of portfolio diversification to preserve and enhance the capital value of the NCS assets in real terms through asset appreciation and income generation to provide sufficient cash flow to meet current needs and maximize growth and minimize volatility and losses to satisfy its long-term goals and objectives. There may be periods of time and under certain economic conditions when it is deemed prudent to be invested 100% in cash or cash equivalents; however, as a general guideline, the NCS or its Investment Manager will strive to allocate no more than a given percentage of the NCS's Assets to be invested in any one of the following categories:

Asset Mix Allowable Percentage Range

Equity	0%
Fixed Income	0%
Invested Cash	10%

Investment Policy Review

To assure continued relevance of the guidelines, objectives, financial status, and capital markets expectations as established in this statement of investment policy, the Treasurer and Board of Directors will review this investment policy at least annually. This statement of investment policy is adopted on the date indicated below by the Treasurer and Board of Directors. It supersedes all other investment policies and investment guideline statements.

General Reimbursement Policy Statement

NCS serves its mission by employing a staff team and relying on the efforts of volunteers who may be requested to carry out the business of the Society; therefore, a policy is necessary to define the general requirements for reimbursement.

The BOD may provide for the reimbursement of any director, officer, or member for reasonable expenses incurred in carrying out approved business of the Society. Expenses that have been budgeted will be reimbursed. Non-budgeted expenses must be approved by the NCS Executive Committee or Board based on policy Budget, Financial and Monitoring System Policy.

Approved expenses incurred on behalf of the Society will be reimbursed as submitted using the NCS Reimbursement Request Form.

In accordance with IRS requirements, original receipts for expenses of \$25 or more must be submitted with the reimbursement request form.

All requests for reimbursement and receipts for expenses incurred during the approved trip or business should be submitted to NCS Headquarters designated staff within 30 days of the occurrence of the expense.

Travel Reimbursement Policy

This policy outlines the process of reimbursing individuals for reasonable expenses incurred while they travel for approved NCS business functions (i.e., board/committee/council meetings, conferences,

exhibits, speaking engagements, etc.). For reimbursement, all travel expenses must either be a pre-approved budget expense or approved as a budget exception by the Board.

This policy applies to all volunteers, staff, and board members traveling on budgeted and/or board-approved NCS-related business.

1. All NCS volunteers requesting reimbursement must attach all receipts for expenses related to the meeting or event and forward this information to info@neurocriticalcare.org within thirty (30) days following the completion of travel.
 - a. After review and approval of expenses, reimbursements will be disbursed via check if the residence is within the United States or ACH/wire if the residence is outside of the United States. Payment processing can take from 7–14 days following expense approval.
 - b. Any requests for exceptions to the reimbursement provisions outlined in this policy will be forwarded by NCS staff to the Treasurer or Board President for approval.
2. Cost-Effective Travel
 - a. Individuals must select the most cost-effective route available.
 - b. NCS benefits from using the Smithbucklin preferred travel agency for air travel; individuals should use the designated agency unless they can obtain a significantly cheaper flight through other channels.
 - c. Baggage fees, with receipts, will be reimbursed.
 - d. Travelers will receive login information and billing instructions to use the preferred travel agency system. Questions may be directed to info@neurocriticalcare.org.
3. Domestic Air Travel
 - a. NCS will reimburse economy-class airfare only.
 - b. Travel should be booked as early as possible, and the expectation is to book the lowest reasonable fare.
 - c. Fares above \$700 require pre-approval. First-class and business-class travel will not be reimbursed.
 - d. Reimbursement is limited to the lowest fare available by the approved travel agency.
 - e. Volunteers are responsible for any additional cost incurred for flights not booked by the advance reservation cut-off date or for changes after original booking.
4. International Air Travel
 - a. Travel should be booked as early as possible to ensure cheaper fares.
 - b. Individuals should use NCS' preferred travel agent or the booking/payment method offering the most coverage (e.g., credit card travel insurance).
 - c. Baggage fees will be reimbursed with a receipt.
5. Travel by Train
 - a. NCS will reimburse regular economy train fares.
6. Personal Auto Use
 - a. Reimbursement is based on the IRS-established mileage rate and applies only after travel is completed.
 - b. Rental autos will not be reimbursed, unless there are extenuating circumstances which will require Treasurer/President approval.
7. Travel Insurance
 - a. Purchasing travel insurance may be appropriate in certain circumstances depending on travel destinations and will be reviewed and approved for reimbursement on a case-by-case basis.
8. Ground Transportation
 - a. Reimbursable for travel to/from the airport of the departure city and between the airport and hotel at the meeting location.

- b. Limousine-type services will not be reimbursed.

9. Lodging

- a. NCS will prearrange hotel accommodations for board meetings and other volunteers for NCS-approved events.
- b. Charges for room and tax will be billed directly to NCS.
- c. Board members are responsible for additional charges to their rooms.
- d. Individuals traveling to NCS conferences and meetings are expected to book the event hotels at reasonable prices. Travelers will be reimbursed at the standard room rate.
- e. Arrival and departure dates will be based on event start and end dates. Arrival one day prior and departure on the day of or day after (dependent on itinerary) is expected.
- f. For domestic and international travelers whose travel time exceeds 4 hours, an additional day of lodging may be reimbursed.

10. Meals

- a. Meals are reimbursed based on a rate schedule of up to \$95 per person per covered day: \$20 breakfast, \$25 lunch, \$50 dinner, when otherwise not provided by NCS or other meeting organizer. Personal dining in lieu of planned meals will not be reimbursed. Coffee, water, and snacks may be expensed.
- b. Expenses for group meals should include a list of participants and the purpose of the function.

11. Internet Connection

- a. Many hotel rewards programs and contracts provide free internet; please check before paying.
- b. When required and free internet is not available, hotel Wi-Fi and airline charges are reimbursable.

12. Expense Report Submission

- a. Must be completed with all required receipts attached and submitted to info@neurocriticalcare.org within thirty (30) days of travel.
- b. Original receipts required for all expenses over \$25; reimbursement limited to actual amount expended.
- c. Airline/train ticket receipts must be provided; itineraries are not acceptable (IRS ruling).
- d. Receipts for lodging, meals, and ground transportation are required.
- e. If receipts are not provided and reimbursement exceeds \$600 per individual per year, NCS must report the amount to the IRS as income.

13. Apportioning Expenses

- a. If travel to an NCS meeting or event occurs in conjunction with another meeting, expenses should be apportioned accordingly.

Annual Meeting Invited Speaker, Guests, Planning Reimbursement Policy

There are stratified levels of financial support and procedures for administering such support for the invited speakers and professional volunteers of NCS. Volunteers give their time and talent for the benefit of NCS and thus should be supported. Provision of this support will inspire new leadership and volunteer involvement.

Record Retention Policy

It is the policy of the NCS that its records (including electronic files) be retained only so long as they are:

- A. Necessary to the current conduct of the Association's business;
- B. Required to be retained by statute or government regulation; or
- C. Relevant to pending or foreseeable investigations or litigation.

In furtherance of this policy, the association has adopted the record retention schedule, which shall be observed by the association, its officers, Board of Directors, staff, and committee members. These policies are in accordance with New York state non-profit law.

The responsibility for administering the Association's Record Management Program in accordance with this policy is designated to the Executive Director.

The following table outlines the **Record Retention Schedule**

Type of Record	Retention Period
ACCOUNTING	
Auditor's reports/work papers	Permanent
Bank deposit slips	3 years
Bank statements, reconciliations	7 years
Budgets	2 years
Canceled checks, generally	7 years
Cash disbursements journal	Permanent
Cash receipts journal	Permanent
Depreciation records	3 years/Permanent
Dues and assessment schedules	2 years
Financial statements (annual)	Permanent
Financial statements (interim/internal)	3 years
General journal or ledger	Permanent
Inventory lists	3 years
Invoices	3 years
Payroll journal	4 years
Petty cash vouchers	3 years
CORPORATE RECORDS	
Annual Reports	Permanent
Articles of Incorporation	Permanent
Bylaws	Permanent
Application for Recognition of Exemption (Form 1024 or 1023), including related correspondence and determination letter	Permanent
Qualifications to do business	Permanent
Minutes and resolutions (Board and Committees with Board authority)	Permanent
Minutes (Committees without Board authority)	3 years
Authorizations and appropriations for expenditures	3 years

Policies and procedures, generally	For life of policy/procedure
Policies and procedures, employment practices	10 years*
Conflict of Interest Forms	2 years
CONTRACTS	
Contracts, generally	10 years*
Contracts, government	4 years*
Contracts, sales	4 years*
INSURANCE	
Accident Reports	6 years
Insurance Claims	6 years*
Insurance Policies	6 years*
INTELLECTUAL PROPERTY	
Copyright registrations and unregistered copyrightable materials	Permanent
Trademark registrations	Permanent
Patent	Permanent
Domain name registration	For life of domain name
STATEMENTS OF POLICY/POSITION	
Policy statements	For the life of the document
MEMBERSHIP	
Terminations and resignations	1 year
Member surveys	For the life of the document
TAXES	
Annual information and/or income tax returns and canceled checks (federal, state, and local)	Permanent
Payroll tax returns	4 years
Property tax returns	Permanent
Sales and tax returns	4 years
LEGAL	
Claims and litigation files where Association is a party	10 years*
Documents related to third-party subpoenas	30 days after resolution of underlying action

Section IV: External Representation Policy

NCS will need to develop and enter external relationships with other organizations to fulfill the mission and vision. NCS may seek a relationship, or other organizations may request representatives of the NCS to their committees or organizations. This policy establishes guidelines for individuals acting as official representatives of NCS at external events, meetings, and forums. Its purpose is to ensure that the Society is represented accurately and professionally, and that its official positions are communicated consistently.

This policy applies to all Board members, staff, committee chairs, and any other individuals designated to represent the Association to outside entities, including other organizations, government bodies, and the media.

The Board of Directors will designate specific individuals, such as the President, Vice President, or Executive Director, as official spokespersons for the Society.

The Board may also grant specific, limited authority to other members or staff to represent the Society for meetings, committees, or events. No individual may represent or speak on behalf of the Society to external organizations without explicit authorization.

Guidelines for external representation

Representatives must only communicate the official, approved positions of the Society. They are not to express personal opinions or views that have not been officially sanctioned by the Board.

When representing the Society for a specific purpose, individuals must limit their comments and actions to the scope of that assignment.

Before external engagement, representatives should review relevant Society materials, such as mission statements, talking points, and strategic goals.

All representatives are expected to conduct themselves in a professional, courteous, and respectful manner always. They should focus on being collaborative and finding common ground.

When engaging with external entities, representatives must be transparent about their role and the capacity in which they are speaking. A representative must also disclose any potential or actual conflict of interest related to an external organization or matter being discussed.

- When a conflict of interest exists, the representative must recuse themselves from decisions and discussions related to that conflict. The representative may be asked to leave the meeting or discussion during that time.
- Safeguards: For ongoing relationships with outside organizations, necessary safeguards will be established to protect the Association's interests.

Reporting and accountability

Following any external meeting or event, the representative must provide a summary report to the Board and/or Executive Director. The report should include details on attendance, key discussions, and outcomes. All commitments or agreements made on behalf of the Society with external organizations are subject to review and approval by the Board.

Violations of this policy may result in disciplinary action, including the revocation of the individual's authority to act as a representative.

Personal capacity vs. official representation

When an individual who is also a Society member or leader interacts with outside entities in a personal capacity, they must make it clear they are not speaking for the Society. In a personal capacity, individuals may not use official Society resources, letterheads, or titles in a way that suggests they are acting on the Society's behalf. However, they may be able to use their Societal title as part of biographical details.

Internal Social Media Governance Policy

This policy establishes clear standards for the responsible use of social media by individuals acting in an official capacity for NCS. This includes staff, Board members, committee members, and volunteers who are entrusted with representing the Society's mission, vision, goals and values in the public domain.

This policy applies to:

- Official NCS social media channels (e.g., LinkedIn, Facebook, Instagram, X/Twitter, YouTube, Bluesky).
- Any individual posting or engaging on behalf of NCS.
- Any Board member, staff, or volunteer discussing Society-related matters in a public social media forum.

Account Management

Only approved staff or volunteers may create or manage official NCS social media accounts. Administrative or moderator rights to NCS social media platforms will be granted to staff or volunteers at the organization's discretion. Administrators and moderators are expected to abide by the code of conduct outlined in this document. The community manager or Executive Director may revoke status.

Social Media Passwords

Password and login credentials on all social media channels are to be managed by the NCS staff and volunteer designee. This information will be shared with staff or volunteer community administrators or those asked to post for a specific event, campaign, or announcement.

All staff and volunteers are expected to model professionalism online and avoid public statements that could be construed as official NCS positions unless explicitly authorized.

Standards of Conduct

Representation & Branding

- Do not create new NCS social media accounts without Board/staff approval.
- Use the NCS official branding, logos, and messaging guidelines only on approved channels.

Professionalism & Respect

- Maintain a tone consistent with the NCS's mission and values.
- Do not post discriminatory, harassing, defamatory, political or offensive content.
- Engage respectfully with members, partners, and the public—even when disagreements arise.

Confidentiality & Privacy

- Do not share confidential Board discussions, financial information, member data, or internal documents on social media.

- Obtain consent before posting images, recordings, or identifiable information about members, staff, or event participants.
- As applicable, obtain necessary and relevant permissions for copyrighted images, recordings, or other third-party content.

Accuracy & Integrity

- Share only verified and accurate information, correct errors promptly.
- Avoid speculation on Society policy, accreditation, or governance matters unless an official position has been approved.
- Provide proper attribution when sharing third-party content.

Advocacy & Endorsements

- Only authorized individuals may post about advocacy positions, policy statements, or endorsements on behalf of NCS.
- Board, staff, and volunteers should avoid implying NCS endorsement of personal opinions, commercial services, or political activities.

Crisis & Sensitive Issues

Do not respond to controversial or negative posts about the NCS from personal accounts. Immediately forward concerns or reputational risks to the Executive Director. Only designated spokespersons may issue official responses during crises.

Compliance & Enforcement

Violations of this policy may result in corrective action, including removal of posting privileges, disciplinary measures, or Board/committee review.

Advertising Policy

This policy establishes clear standards and procedures for accepting, reviewing, and publishing advertisements in NCS communication channels, including print and digital publications, newsletters, websites, conference materials, and other platforms. This policy ensures that advertising supports NCS' mission and values while maintaining transparency, professionalism, and compliance with applicable laws.

This policy applies to:

- Paid advertising in NCS' print or digital publications.
- Advertising and sponsorships are displayed on the NCS website, e-newsletters, social media, or event programs.
- Exhibit hall or conference-related advertising opportunities and social media banner ads.

Content Standards

- Advertisements must be consistent with the Society's mission, values, goals and professional standards.
- Content must support, or at least not conflict with, the interests of the Society's members.

Right of Refusal

- NCS reserves the right to refuse any advertisement that is inconsistent with its mission, values, goals or policies. Acceptance of advertising does not imply endorsement or guarantee of accuracy by NCS.

Accuracy & Compliance

- Advertisers are responsible for ensuring that all claims are truthful, accurate, and in compliance with applicable laws, regulations, and industry standards. Comparative claims or unsubstantiated guarantees may be rejected.

Prohibited Content

NCS will not accept advertising that includes:

- Discriminatory, offensive, defamatory, or misleading content.
- Promotion of illegal products, services, or activities.
- Political campaign materials or endorsements of individual candidates.
- Content that conflicts with the Society's Code of Ethics or professional standards.

Sponsorship & Endorsements

- Sponsorship recognition is permitted but does not constitute an endorsement of a product, company, or service.
- Any use of the Society's name or logo by advertisers must be pre-approved and limited to specific contractual agreements.

Review & Approval

- Advertising will be reviewed by the [Communications Committee/Executive Director/Staff designee] to ensure compliance with this policy.
- Questionable submissions may be deferred to the Board of Directors for final decision.

Disclaimer

All advertisements accepted by NCS will include the following disclaimer:

"Publication of an advertisement does not imply endorsement by NCS. The Society is not responsible for the accuracy of claims made in advertisements.

Enforcement

Violations of this policy may result in rejection of advertising, termination of advertising agreements, or future denial of advertising privileges.

Section V: Privacy Policy

NCS has created this privacy policy to demonstrate our commitment to your privacy and protection of personal information that we collect and process. The following discloses our information gathering and dissemination practices. Unless the context indicates otherwise, the terms “you” and “your” refer to both you individually and any entity on whose behalf you are accessing our website.

This privacy policy applies to all information collected by NCS (our “Collection Places”):

- Through this Website (including its integrated third-party platforms).
- Through other platforms we use to facilitate our management of the services we provide to you (e.g., conference registration sites); and
- In email, text, other electronic messages or by telephone or other communications between you and us and (if you are a member) between you and other members through the Website.

Personal Information You Provide Voluntarily to NCS

We collect personal information at our Collection Places that includes, but is not limited to, name, telephone number, email address, employer, professional title, date of birth, home or business and mailing address, gender, details regarding your entity and business, your job title, username and password (in hashed form), company contacts for corporate members, photographs, and education.

The personal information you are asked to provide (including whether its provision is mandatory or not) enables us to facilitate your access, purchase, use and/or participation in our service offerings (collectively “Services”), such as:

- a. Membership;
- b. Conferences & Events;
- c. Educational programs;
- d. Online forums;
- e. Certification/accreditation activities;
- f. Volunteer opportunities;
- g. Products for sale;
- h. Career services;
- i. Surveys; and
- j. Any other services and products that are updates or extensions to our Services or relate to other member benefits.

If you choose not to provide us with your personal information, you may not be able to enjoy certain components of NCS Services.

Additionally, we will collect personal information when:

- You ask us to contact you via mail, email, or telephone to provide information, updates, or promotions about our Services; and
- We enter into agreements for affiliated partnerships (e.g., exhibitors, sponsors, advertisers).

At other times, we may collect information that cannot be used to identify you. For example, we may aggregate non-personal information about you and other customers who visit our websites. Aggregated information will not contain any information that can be linked directly back to you.

Where we have de-identified personal information to protect it, we will not re-identify such information and, if such de-identified information is shared with a third party as described below in Section XII.5, we

will take steps to ensure that no re-identification occurs. It may also be important for us to keep certain information relating to your account or membership, however. If you request deletion of your personal information as described below in Section XII.8, we may remove it from data sources by de-identifying it.

Personal Information We Collect Automatically

In addition to the Collection Places, we may use any number of tools to collect information about you, your computer access points, and the web browser that you use to connect to our website. For example, cookies are tiny text files that we place on your computer’s hard drive when you visit our website. We may use cookies to personalize your interactions with our websites. You do not have to accept our cookies, and you may set your browser to restrict their use, and you may delete them after they have been placed on your hard drive. If you delete or do not accept our cookies, some areas of our website may take more time to work or may not function properly.

We may also collect additional information from your web browser each time you visit our website. We may collect information about the pages that you visit, the time spent on each web page or area of the website, the promotions, or advertisements that you click on, and other actions that you take while using our website. This information may include your Internet Protocol (“IP”) address, the type of browser, the time that your browser was used to access our website, and the referring website’s address. We may also use tools such as Google Analytics.

Our Service Providers (defined below) may also use other standard web-based technologies to analyze your movements while accessing our websites. The technologies include web “beacons,” “pixel tags,” and “clear gifs.” These technologies help us ascertain the effectiveness of our product and service campaigns and marketing programs, allow us to customize the services offered on or through our website, and help determine the best use for Website content, and product and service offerings. Some of this information, including the IP address, may be stored on our Internet service provider’s server logs, and may be available for extended periods of time.

Links

Our website may contain links to other sites. Please be aware that we are not responsible for the content or privacy practices of such other sites. We encourage our users to be aware when they leave our website and to read the privacy statements of any other site that collects personally identifiable information.

Our Use of Your Personal Information

NCS may use your personal information to:

- a. Provide you with information about our Services and affiliate partnerships;
- b. Fulfill your member benefits;
- c. Facilitate your attendance/participation at our conferences and events (both in person and virtual);
- d. Track your attendance at conferences and trade shows (including exhibitor spaces);
- e. Prepare invoices and process payments;
- f. Respond to any of your questions or requests or other communications you send to us;
- g. Carry out our obligations and enforce our rights arising from any contract entered between you and us;
- h. Fulfill any other purpose for which you provide information to us;
- i. Present our Website effectively to you; or
- j. Perform any other legitimate purpose reasonably consistent with your membership or affiliated partnership, or otherwise allowed or required by law.

Additional uses of your non-personal and personal information will allow us to tailor our Services specific to your needs, to help organize and manage our relationship with you or your business, to conduct business, to provide you with support, and to perform functions that are described to you at the time of collection.

In general, we will use the personal information we collect from you only for the purposes described in this privacy policy or for purposes that we explain to you at the time we collect your personal information. However, we may also use your personal information for other purposes that are compatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

The first time that you provide us with registration information through our website, you may be offered the opportunity to subscribe to and receive additional information about our products and services. Each commercial email that we send to you will offer you the opportunity to opt-out of continuing to receive such messages. We may take up to ten business days to process opt-out requests. In some instances, we may have already shared your information with one of our authorized third parties before you changed your information preferences, and you may briefly continue to receive email even after you have opted out. FTC email compliance guidance allows us to send you transactional and relationship email without offering you the opportunity to opt-out of receiving those types of email.

Our Disclosure of Your Personal Information to Third Parties

We may share your personal information with the following categories of recipient:

- Third party service providers (“Service Providers”) who provide (without limitation) administrative/operational services; data processing; membership services; marketing & communication services; meeting management services; website hosting services; membership database services; credit card processing; conference registration; conference mobile applications; conference/event hotels and venues; or who otherwise process personal information for purposes that are described in this privacy policy or notified to you when we collect your personal information;
- Other NCS members may receive certain pieces of personal information as part of a membership directory or through collaboration portals. In addition, if you sign up to attend a member meeting or other NCS-sponsored event, all other NCS members who sign up for the event will be notified of your intended attendance at the event and may be given your full name, address, company name, and email address;
- Other third parties such as exhibitors, sponsors and advertisers, may receive membership lists or event attendance lists that include your full name, address, company name, and email address; and other not-for-profits who share our mission may receive information for purposes specifically related to our activities and missions, including the Neurocritical Care Foundation.

We may also disclose your personal information as is necessary to: (a) comply with a subpoena or court order; (b) cooperate with law enforcement or other government agencies; (c) establish or exercise our legal rights; (d) protect the property or safety of our organization and employees, contractors, vendors, suppliers, and customers; (e) defend against legal claims; (f) help with internal and external investigations; or (g) as otherwise required by law or permitted by law. We may disclose your information in connection with the sale or merger of NCS or any transaction that involves the sale or assignment of some or all our assets.

Data Storage and Security

You should take care regarding how you handle and disclose your personal information or any username or password that you are required to use to access all our Collection Places.

We take appropriate security measures to protect against unauthorized access to or alteration of your personal information. Unfortunately, no data transmission over the Internet or any wireless network can be guaranteed to be 100% secure. As a result, while we use commercially reasonable safeguards to protect against unauthorized access to or alteration of your personal information, there are security and privacy limitations inherent to the Internet which are beyond our control. The security, integrity, and privacy of all security measures to protect against unauthorized access to or alteration of your personal information and data exchanged between you and us thus cannot be guaranteed.

We make reasonable efforts to ensure that our Service Providers have implemented physical, electronic, and procedural security measures to assist with safeguarding your personal information, and to help protect against unauthorized access and disclosure.

We will not keep your personal information for longer than necessary for the purpose for which it was collected or as otherwise required by law. We will securely destroy or erase personal information from our systems when it is no longer required to be retained. We also will endeavor to ensure the deletion and destruction of personal information stored and maintained by our Service Providers.

Children and Data Collection

Our website content is not directed toward children who are under the age of sixteen. We do not knowingly collect personal information from children. If we become aware that a child under the age of sixteen has provided us with personal information without parental consent, that information will be deleted from our databases. If you have questions about personal information that may have been submitted by a child, please email us at privacy@neurocriticalcare.org.

Data Rights

Where your personal information is processed in the context of our activities as a data controller in the European Union, you have the following statutory rights with regards to your Personal Data under the General Data Protection Regulation (“GDPR”):

- You can request access to your personal information, including the provision of a copy of the personal information subject to processing.
- You can ask us to update or correct any inadequate, incomplete, or inaccurate data.
- You can request erasure of your personal information.
- You can restrict the processing of personal information (e.g., we may only store but not use your information while we assess your request for erasure).
- Where processing is based on our legitimate interests including profiling, you have the right to object to the processing.
- Where we process your personal information for direct marketing purposes, you have the right to object to the processing at any time.
- Where processing is based on your consent, you have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.
- Where processing is based on consent or on a contract, you have the right to data portability, meaning that you can ask us to provide your personal information in a structured, commonly used, and machine-readable format for your use or transfer to another.

- You may have the right to object, on grounds relating to your particular situation, at any time to the processing of personal data concerning you. If you do so, we will discontinue the processing of your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or if the processing serves the purpose of the establishment, exercise or defense of legal claims. To exercise this right, please contact us via the means indicated below.

If you believe that our processing of personal data concerning you is unlawful, you have the right to complain to the supervisory authority with authority over you. A list of the EU national data protection supervisory authorities is available at https://www.edpb.europa.eu/edpb_en.

Our website and the servers and facilities that maintain the data we hold are operated in the United States and other countries outside of the European Union. Our use of information necessarily involves the transmission of personal information on an international basis. If you are in the European Union, Canada or elsewhere outside of the United States, please be aware that information we collect may be accessed, transferred to, and processed in the United States. By using the website, or providing us with any information through a Collection Place, you make necessary and consent to the collection, processing, maintenance and transfer of such information in and to the United States and other applicable territories in which the privacy laws may not be as comprehensive as or equivalent to those in the country where you reside and/or are a citizen.

Other Data Rights

You may have the following rights with respect to your personal information, in certain circumstances:

- The right to know the categories and specific pieces of personal information we have collected about you in the last 12 months, the sources from which the personal information was collected, and the business purpose for collecting such information.
- The right to know whether and how we sell or disclose your personal information, to whom we sell or disclose your personal information and the categories of personal information sold or disclosed, and the business purpose for selling or disclosing your personal information.
- The right to request a copy of the specific pieces of personal information we have collected about you in the last 12 months.
- The right to request that we do not sell your personal information.
- The right to request that we delete the personal information that we have collected from you, in certain circumstances; and
- The right not to receive discriminatory treatment for the exercise of your privacy rights.

You may make a request to exercise these rights by contacting us as described below. Upon receipt of a request to exercise your rights, we may request additional information to verify your identity. You may also be required to confirm your identity under relevant law or regulation. To the extent possible, we will utilize information already in our possession to verify your identity. Any information you provide in connection with such verification will be deleted as soon as practicable following your request and not used for any other purpose.

You may be able to designate an authorized agent to make a request on your behalf. If you submit a request through an authorized agent, we may require that the authorized agent provide proof that the authorized agent has been authorized by you to act on your behalf and may still require you to verify your identity in accordance with the above and directly confirm that you provided the authorized agent with permission to submit the request.

You may have the right not to be discriminated against for exercising any of your rights.

Making a Data Rights Request

If you wish to exercise any of the rights described above or if you have any questions or concerns about how we treat your personal information, please contact us via the following means:

- By email at info@neurocriticalcare.org; or
- By mail at 330 N Wabash Ave. Suite 2000, Chicago, IL 60611.

Depending on where you reside, we will respond to your request within 45 days of receipt, either to provide the information or confirm completion of the act requested or, in certain circumstances, to notify you of an extension of the time frame for response by up to a maximum of two further months.

Rooms/Forums/Message Boards/News Groups

Our website may make digital forums available to its users. Please remember that any information disclosed in these areas becomes public information, and you should exercise caution when deciding to disclose information through these areas of the Website.

General Information and Privacy Support Contact

We may update this privacy policy from time to time, and you should take the time to review it each time that you visit one of our websites. We are committed to protecting your personal privacy. If you have questions or comments about our efforts to protect our personal privacy, or if you require additional information about our privacy commitment, please contact us at info@neurocriticalcare.org.