

This privacy notice for California residents supplements the information contained in the Privacy Policy for the Covered Sites and applies solely to our users who are residents of the State of California (“consumers” or “you”) in relation to your use of each Covered Site, which is owned by a subsidiary of Jobson Healthcare Information LLC (“JHI”). We refer to the Covered Sites, along with the information and services made available to you through the Covered Sites as the “Services.”

We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in our Privacy Policy or in the CCPA have the same meaning when used in this notice.

Information we collect.

We have collected the following categories of information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	Yes
B. Personal information listed under Cal. Civ. Code § 1798.80(e).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	Yes
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	No
D. Commercial Information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
E. Biometric	Genetic, physiological, behavioral, and biological	No

Information.	characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
G. Geolocation data.	Physical location or movements.	No
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	No
I. Professional or employment-related information.	Current or past job history or performance evaluations.	Yes
J. Non-public education information.	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	No
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

Certain information that we collect identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("personal information").

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; or
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

If a Covered Site is not listed or covered below in this section of this Privacy Policy, then no personal information will be collected on that Covered Site unless you email or "contact" that

Covered Site.

Personal information collected on the Periodical Publication Sites

Many of the Periodical Publication Sites offer you the chance to subscribe to one or more of our periodical publications in print and/or electronic form. When you subscribe to any periodical publication, you will be asked for personal information that includes your first and last name, title, company name, address, phone number, e-mail address and/or credit card (unless you qualify for a free subscription). In some cases, depending on the publication, you may be asked for additional information, such as your gender and the year you graduated from your professional school.

Certain Periodical Publication Sites (e.g., Review of Ophthalmology, Review of Optometry, Review of Cornea and Contact Lenses) have links to "CME," "CE," or CME/CE "Events" or "Programs." If you are on one of those sites and you click on one of those links, you will be taken to www.reviewsce.com, where any personal information you may provide will be subject to that site's privacy policy.

Certain Periodical Publication Sites have links to educational (non-CME/CE) "Events." If you click on one of those links, you will be taken to the site of our third-party registration service, Cvent (www.cvent.com), which will ask you for certain personal information that it needs to register you for whatever event you wish to attend. Any personal information you may provide on the Cvent will be subject to the privacy policy on the page where you provide your personal information.

Personal information collected on the Frames Data® Site

You will be asked to provide your name, email address, and other items of personal information, if you:

- subscribe to the Frames Data® 365Print, Frames Data® 365DVD, SPEX UPC CD-ROM, Review of Cornea & Contact Lenses Guide, the Lenses Product Guide, Frames Data IDA, or My Frame Gallery (in which case, the personal information will include your credit-card information);
- download a free e-book or newsletter, sign up for a free trial, or request a demo;
- contact us to ask how being listed in Frames Data® products will make it easy for your retailer customers to work with your products; or
- request technical support.

You will be asked to provide your name, email address, and other items of PII, if you are a software developer and you contact us:

- to request specifications for integration;
- because you are having a problem integrating our data into a particular software application; or
- to ask for a demonstration CD-ROM or DVD for a Frames Data® digital product.

If you are an eye care patient and you access your eye care practitioner's frame gallery, you

will be going to the My Frame Gallery section of the Frames Data® Site. There, the personal information you will be asked to provide will depend on which items of personal information your eye care practitioner ("ECP") chose to ask for when your ECP set up its version of My Frame Gallery.

Personal information collected on the Jobson Interactive and Jobson Research sites

If you sign up either for the Jobson Interactive marketing email list or the Eyefind® email list, you will be asked for personal information that includes your name, email address and other personal information that may include your job title; company name, full company address, company phone number, company type (e.g., OD practice, lab), and whether the company is independent or part of a chain.

When you buy a product on the Jobson Research Site for the first time, you will be asked for personal information that includes your name, address, and email address.

Personal information collected on the Alert Marketing Sites

If you request a quote on a program or ask for "additional information," you will be asked for your name, company, title, company address, phone number, and e-mail. The method by which you want us to provide you with the information you are requesting will determine which items of personal information you need to provide. For example, if you want us to send you the requested information via e-mail, you will need to provide your e-mail address, but not your phone number.

If you ask to receive our e-pharm/alert® emails, you will be asked for your e-mail address, name, company, department, title, and phone number.

If you complete a "profile" on the M.D./alert Site, you will be asked for your first and last name, e-mail address, profession, degree, specialty, sub-specialty, work ZIP code, and country.

If you engage with an advertisement or any other kind of communication on, through or in connection with the M.D./alert Site, you also may be asked to provide additional items of personal information.

If you click through to a section of the M.D./alert Site that is operated by one of our sponsors (a "Sponsor Site"), you will be taken to the website where that Sponsor Site resides and any personal information you provide there will be subject to the privacy policy of that website.

Categories of sources from which information is collected.

As described in our Privacy Policy, we may obtain the categories of personal information listed above from the following categories of sources:

- Directly from you, such as when you subscribe to a publication.
- Indirectly from you, such as information we may collect in the course of providing the Services.
- Directly and indirectly from your activity on our Covered Sites, as described above.

- From third parties that interact with us in connection with the Services as described below under Use of personal information collected on the Covered Sites.

Use of personal information collected on the Covered Sites

Personal information included in each of the categories A, B, D, F, and I described above may be used for each of the following business purposes:

- *"Contact us" requests.* If you have submitted a "contact us" form on one of the Covered Sites or emailed us asking us to contact you, your PII will be used to respond to your request.
- *Requested information, products and services.* We will use your personal information to send you the Services you have requested, contact you if there is a problem with providing you with those Services, add your name to the lists for Services you have asked to receive, discontinue any Services that you have asked to stop receiving, renew any subscriptions to Services that you ask us to renew, update your personal information with any changes you have provided to us, and notify you if there are any issues with the Services.
- *Technical support/assistance.* We use your personal information to provide you with technical support or whatever other assistance you may need.
- *Newsletters and notifications about other healthcare goods and services.* The owner of each Covered Site, either directly or through JHI, may use your personal information to send you newsletters about upcoming promotional events, newsletters about developments and opportunities in the healthcare industries, and information about other healthcare-related goods and services that the owner of that Covered Site, its affiliates, and/or other organizations are offering.
- *Surveys.* The owner of any Covered Site, either directly or through JHI, may use your email address to send you short surveys that ask your opinions on various topics related to the industry.
- *My Frame Gallery™.* Whatever personal information you provide through My Frame Gallery (which, again, depends on which items of PII your ECP has chosen to ask for) will be transmitted to your ECP for your ECP to use to send you your wish list and to contact you regarding a possible appointment. We will not store it on the Frames Data® Site or use it in any way. Your ECP's use, disclosure, etc. of your personal information will be governed by the privacy policy on your ECP's site.

Sharing your personal information.

The following applies to personal information collected on all Covered Sites except for the My Frame Gallery portion of the Frames Data® Site, since personal information that is collected there is used, stored and shared exclusively by each user's ECP.

Personal information disclosed for a business purpose

We may disclose your personal information for a business purpose to the following categories of third parties and under the following circumstances:

- *Service Providers.* The owner of each Covered Site and/or JHI may provide your personal information to Service Providers who work on behalf of that Covered Site or help JHI operate that Covered Site and conduct the different activities conducted through and in connection with that Covered Site. Examples of such Service Providers include, but are not limited to, (i) vendors and suppliers that provide us with technology, services and/or content for sending email, analyzing the operation of the Covered Sites and data generated by user activity, research, providing advertising and marketing assistance, and providing customer service, (ii) our fulfillment house (which mails out some of our print publications) and the printer of our print publications (which mails out some of our print publications), and (iii) our third-party credit card processing vendor. These Service Providers' access to your personal information is limited to the information reasonably necessary to perform their limited functions.
- *Affiliates and others.* The owner of each Covered Site may provide your personal information to its affiliates and others who may use it to send you information about healthcare - related goods and services.
- *List management providers.* The owner of any Covered Site, JHI, and/or one of JHI's other affiliates may send a list that includes your e-mail address and/or your street address to a third-party agency, vendor or client to perform list management operations, including comparing, merging and deduping lists.
- *Social Media Sites:* We may include social widgets within the Covered Sites. Such widgets enable you to interact with the associated social media services. These widgets may collect browsing data which may be received by the social media services that provided the widget and are controlled by such social media services. As a result, you may see ads for products and services offered by the Covered Sites while you are on such social media services.
- *Advertisers and sponsors on M.D./alert Site.* When you view or click through to an advertisement on the M.D./alert Site, and when you visit a Sponsor Site, we may provide your professional identification number (which usually is your NPI or ME number) and information about just how you engaged with that content (e.g., whether you viewed, interacted with or requested information about particular content) to current and potential advertisers, sponsors and/or their agents.
- *Sunshine reporting.* Sponsors of Review of Optometry® promotional programs may ask us for information that they need to comply with the federal "Sunshine Act." In response to such a request, we will provide your first, middle and last name, your city, state, ZIP code, medical license number, NPI number, email address, and phone number.
- *Safety.* The owner of any Covered Site may disclose your personal information to protect the safety, rights, or property of the public, any person, the owner of such Covered Site or JHI; to investigate, prevent, or otherwise address suspected fraud, harassment or other violations of any law, rule or regulation; to detect, prevent or otherwise address security or technical issues; or as the owner of such Covered Site and/or JHI believes is required by law, regulation, or legal process.

In the preceding twelve (12) months, we may have disclosed personal information included in categories A, B, D, F, and I for each business purpose described above depending on your use

of the Services described herein.

Personal information "sold" to third parties

As described above under *Advertisers and sponsors on M.D./alert Site*, we may share personal information that we have about your engagement with certain media with current and potential advertisers, sponsors and/or their agents. We also may share information that we have about you with third party advertising partners who may use this information, on our behalf, to help us deliver advertising throughout the Covered Sites as well as on third party websites.

In the preceding twelve (12) months, we may have made available to third parties your personal information included in each of categories A, B, D, F, G, and I described above depending on your use of the Services described herein.

For more information about our use of cookies and other tracking technologies, please read our [Cookie Policy](#).

We do not sell the personal information of consumers that we know are minors under 16 years of age without affirmative authorization as required under the CCPA.

Your rights.

The CCPA provides California consumers with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to specific information and data portability rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- the categories of personal information we collected about you.
- the categories of sources for the personal information we collected about you.
- our business or commercial purpose for collecting or selling that personal information.
- the categories of third parties with whom we share that personal information.
- the specific pieces of personal information we collected about you (also called a data portability request).
- if we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period.

Deletion rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- debug products to identify and repair errors that impair existing intended functionality.
- exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
- enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- comply with a legal obligation.
- make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Right to opt out of the sale of your personal information

You have the right to opt out of the sale of your personal information subject to certain exclusions as described below. Once we receive your request, we will not sell your personal information, unless an exclusion applies. We may request that you authorize the sale of your personal information after 12 months following your opt-out.

The CCPA excludes certain transfers of your personal information from what constitutes a sale thereof:

- As directed by you:
 - When you direct us to intentionally disclose your personal information or use the Services to intentionally interact with us or a third party (provided that third party does not sell your personal information, unless that disclosure would be consistent with the CCPA).
- Opt-out signal:
 - We may share an identifier for you if you have opted out of the sale of your personal information for the purposes of alerting third parties of your election.

- Service provider:
 - We may share your personal information with a service provider that is necessary to perform a business purpose as described above if both of the following conditions are met:
 - we provide notice of the sharing and your opt-out right as described herein.
 - the service provider does not further collect, sell, or use the personal information of the consumer except as necessary to perform the business purpose.
- Change of control:
 - We may transfer to a third party your personal information as an asset that is part of a merger, acquisition, bankruptcy, or other transaction subject to certain requirements described in the CCPA.

We are unable to process opt-out requests across devices for advertising services described herein. Please see below on how to opt out across devices.

Exercising access, data portability and deletion rights

To exercise the access, data portability, deletion and opt-out rights described above, please submit a request to us by either:

- Calling us at (866) 967-1430.
- Clicking [here](#).

By calling the toll-free number or using the above form, you will be asked to provide certain identifying information, such as name, email, residency and date of birth, which we will only use to process or verify your request. You will be asked to validate your request by clicking a validation link in an email that will be sent to the email address provided.

The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

If you are exercising your right to access, portability or deletion, you may be asked to provide further verifying documentation, such as proof of residency and identity.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. If you are making a request through an authorized agent acting on your behalf, such authorized agent must provide proof of written authorization to do so, and you must verify your identity directly with us, unless such authorized agent provides proof of a power of attorney pursuant to Probate Code sections 4000 to 4465.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Exercising your opt-out rights

You may exercise your opt-out right by visiting our website and clicking the "Do Not Sell My Personal Information" link in the footer.

Additionally, most browser software can be set to reject all cookies, including third party cookies, however, if you choose to reject our cookies, your ability to access and use the Services will be limited. Typically the cookie settings are within the "options" or "preferences" menu in your browser. The links below provide information about cookie settings for some commonly used browsers:

- [Internet Explorer](#)
- [Chrome](#)
- [Safari](#)
- [Firefox](#)

You can opt-out of interest-based advertising on the Sites by rejecting cookies and through [preferences manager](#). Please note that even if you reject cookies and opt-out of interest-based advertising, you will continue to receive generic advertisements through the Services. You can learn more about managing your preferences for ads online, particularly for many third-party advertising networks, through resources made available by the Digital Advertising Alliance at <https://www.aboutads.info/> or the Network Advertising Initiative at <https://optout.networkadvertising.org>. Note that if you delete cookies, use a different device, or change web browsers, you may need to opt out again.

You may control interest-based advertising on your mobile device by enabling the "Limit Ad Tracking" setting in your iOS device's settings or "Opt out of Ads Personalization" in your Android device's settings. This will not prevent you from seeing advertisements, but will limit the use of device advertising identifiers to personalize ads based on your interests. You also may disable the transmission of precise location information through your device settings.

Response Timing and Format.

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. Any disclosures we provide will cover a period of no less than 12 months preceding the receipt of a verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is

excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination.

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

We may provide a different level of Services if the difference is reasonably related to value provided by your data.

Changes to this privacy notice.

We reserve the right to change or modify this privacy notice and any of our Services at any time and any changes will be effective upon being posted unless we advise otherwise. By continuing to use the Services after changes are made to this privacy notice, you agree to such changes. We encourage you to periodically review this privacy notice for the latest information on our privacy practices.

Contact information.

For questions about this privacy notice and how your personal information may be collected, stored, used, and shared, please contact our Privacy Office by email at chiefprivacyofficer@jhihealth.com or calling us at (866) 967-1430.

Effective Date: January 1, 2020