

## PRIVACY POLICY FOR CME/CE SITES

### Introduction

- This privacy policy ("this Privacy Policy") describes the way personally identifying information ("PII") is collected, stored, used and shared on the sites listed below (the "CME/CE Sites"), where you can participate in CME, CNE, CPE or CE activities that are designated for CME/CE credit by various accredited organizations (individually, CME Activities or CE Activities, and collectively, "CME/CE Activities"):
  - [www.2020mag.com](http://www.2020mag.com) (the "20/20 Site"). The 20/20 Site is owned by Jobson Medical Information LLC ("JMI")
  - [www.cmeuniversity.com](http://www.cmeuniversity.com) (the "CMEU Site"). The CMEU Site is owned by Postgraduate Institute for Medicine, Inc. ("PIM").
  - [www.icpme.us](http://www.icpme.us) (the "ICPME Site"). The ICPME Site is owned by International Center for Postgraduate Medical Education, LLC ("ICPME").
  - [www.powerpak.com](http://www.powerpak.com) (the "Power-Pak Site") The Power-Pak Site is owned by Postgraduate Healthcare Education, LLC ("PHE").
  - [www.reviewsce.com](http://www.reviewsce.com) (the "RGVCE Site"). The RGVCE Site is owned by Review Group Vision Care Education, LLC ("RGVCE").
- Each CME/CE Site is owned by a subsidiary of Jobson Healthcare Information LLC ("JHI"), which provides circulation, marketing, and IT services to all the CME/CE Sites. The words "we" or "us" in any paragraph of this Privacy Policy will refer to the owner of the CME/CE Site whose practices are being discussed in that paragraph.
- The CME/CE Activities on the CME/CE Sites and the related information services that the owner of each CME/CE Site provides on and through that CME/CE Site will be referred to as "the Services." The CME/CE Sites' ability to provide some of the Services, including, without limitation, the provision of CME/CE certificates upon the completion of post-tests, and the provision of additional information to you after you take a post-test that may interest you, depends your provision of certain PII.
- By providing PII that is described below on or through any CME/CE Site, you expressly consent to that CME/CE Site's collecting that information and to its using, storing and sharing that PII as provided in this Privacy Policy.

### PII collected

- **20/20 Site:** When you sign up to take a CE Activity test, you are asked to create a CE learner profile that includes your name (first, middle, last), professional title, address, phone, e-mail, as well as the numbers, states and expiration dates of your licenses. If you are an optometrist, we may also ask you for your OE tracker number. You also may be asked for a credit card, but when you provide that information, you will be redirected to the site of our third-party credit-card processor, and the collection, use and disclosure

of your PII on that site will be governed by the privacy policy on the site of that company.

- **CMEU Site** If you participate in a CME/CE Activity on the CMEU Site and you want to claim credit, you will be asked for your name, street address, telephone number(s), e-mail address, profession and specialty. You also may be asked for (i) your NPI number if you are participating in a CME/CE Activity related to a federally mandated Risk Evaluation and Mitigation Strategy ("REMS") for which participant tracking is required by the U.S. Food and Drug Administration ("FDA"), or (ii) your unique NABP e-profile ID ("e-PID"). If you are claiming ACPE credit, we ask you for your month/day of birth. You also may be asked for a credit card, but when you provide that information, you will be redirected to the site of our third-party credit-card processor, and the collection, use and disclosure of your PII on that site will be governed by the privacy policy on the site of that company.
- **ICPME Site:** When you create an account on the ICPME Site, you are asked for your name, street address, telephone number(s), e-mail address, profession and specialty. If you purchase a CME/CE Activity, we also ask you for a credit card, but when you provide that credit-card information, you will be redirected to the site of our third-party credit-card processor, and the collection, use and disclosure of your PII on that site will be governed by the privacy policy on the site of that company.
- **Power-Pak Site:** When you sign up to take a CME/CE Activity on the Power-Pak Site, you create a "CE student profile" that includes your name (first, middle, last), address, phone, and e-mail and your NPI#. If you are licensed in Florida, we also ask you for the numbers, states and expiration dates of your licenses for tracking by the Florida Board of Pharmacy's "CE Broker" system. If you are a member of NABP, we ask you also for your NABP e-PID and your birth date and month. You also may be asked for a credit card, but when you provide that information, you will be redirected to the site of our third-party credit-card processor, and the collection, use and disclosure of your PII on that site will be governed by the privacy policy on the site of that company.
- **RGVCE Site**
  - If you came to the RGVCE Site from the Review of Optometry® site, then when you sign up to take CE Activities, you create a "CE student profile" that includes your name (first, middle, last), address, phone, and e-mail, as well as the numbers, states and expiration dates of your licenses and your NPI#. You also may be asked for a credit card, but when you provide that information, you will be redirected to the site of our third-party credit-card processor, and the collection, use and disclosure of your PII on that site will be governed by the privacy policy on the site of that company.
  - If you came to the RGVCE Site from the Review of Ophthalmology® site, and you click on the link to a particular CME Activity that is offered by a third party, you will be taken to the site of the third-party company that offers that CME/CE Activity, and the collection, use and disclosure of your PII on that site will be governed by the privacy policy on the site of that company. If you click on the

link to a CME Activity that is offered by RGVCE itself, then you will remain on the RGVCE Site and the collection, use and disclosure of your PII will be governed by this Privacy Policy.

### **Use of PII collected on the CME/CE Sites**

- **Grading and certificates.** JHI will use your PII to grade the posttest of any CME/CE Activity in which you participate and to create a certificate of completion documenting your participation in that CME/CE Activity that you can download. If JHI uses a third-party company to provide those services, JHI will give your name, street address, e-mail address, profession and specialty to that company for that purpose only. If you are a member of NABP, the third party will notify NABP through CPE Monitor that you passed the test but will identify you only by your e-PID and your birth month and date (mm/dd).
- **Credit card processing.** All credit card transactions related to the Services are conducted by a third-party credit card processing vendor, who processes the transaction and advises the owner of the CME/CE Site if the charge has been authorized or rejected. Credit-card information is not stored on any CME/CE Site and cannot be accessed by the staff of the CME/CE Site.
- **User verification/match.** Occasionally, JHI will use your street address for user verification and matching.
- **Notification of other CME/CE Activities.** The owner of each CME/CE Site, either directly or through JHI, may use your PII to send you information by email, text or mail about other CME/CE Activities that are being offered by the owner of that CME/CE Site or by third parties that are providers or education partners/joint providers of CME/CE Activities on that CME/CE Site ("Provider/Partners").
- **Notification about other healthcare goods and services.** The owner of each CME/CE Site, either directly or through JHI, may use your PII to send you information by email, text or mail about other healthcare-related goods and services that the owner of that CME/CE Site, its affiliates, and/or other organizations are offering.

### **Disclosure of PII to third parties**

- **Service Providers.** The owner of each CME/CE Site and/or JHI may provide your PII to Service Providers who work on behalf of that CME/CE Site or help JHI operate that CME/CE Site and conduct the different activities conducted through and in connection with that CME/CE Site. Examples of such Service Providers include vendors and suppliers that provide us with technology, services and/or content for sending email, analyzing the operation of the CME/CE Sites and data generated by user activity, research, providing advertising and marketing assistance, and providing customer service, as well as our third-party credit card processing vendor as mentioned above. These Service Providers' access to your PII is limited to the information reasonably necessary to perform their limited functions.

- **Accrediting and certifying organizations.** The owner of each CME/CE Site may report your participation and share your PII with the organizations that are authorized to accredit organizations that provide the CME/CE Activities on that CME/CE Site, including, but not limited to, the Accreditation Council for Continuing Medical Education (ACCME), the Accreditation Council for Pharmacy Education (ACPE), the American Nurses Credentialing Center's Commission on Accreditation, the Council on Optometric Practitioner Education (COPE), the American Registry of Radiologic Technologists (ARRT), American Board of Opticians (ABO), the National Contact Lens Education (NCLE), and the Florida Board of Pharmacy.
- **Commercial supporters.** On occasion, the commercial supporter of a CME/CE Activity (the "Supporter") will ask the owner of a CME/CE Site for a list of the people who participated in that CME/CE Activity, in order to comply with applicable laws or document the first level of outcomes-based evaluation in CME/CE (i.e., the profile of the learners who participated, a summary of which medical specialties/practices were represented, how this compares to the target audience, and whether the CME/CE Activity needs to be repeated because significant numbers of the target audience did not participate). If the Supporter requires information to document the first level of outcomes-based evaluation, the owner of that CME/CE Site or JHI will provide the Supporter with a summary of the learner profile that participated in the activity, but CME/CE Site will not provide the Supporter with your PII. If the Supporter requests information to comply with applicable laws, and in particular, the federal "Sunshine Act," the owner of the CME/CE Site will provide your first, middle and last name, your street address, and the fact that you participated in a particular CME/CE Activity.
- **Provider/partners.** On occasion, a Provider/Partner will request for record-keeping purposes a list of the people who participated in a particular CME/CE Activity that the Provider/Partner prepared or certified for credit. In response to such a request, the owner of the CME/CE Site that provided that particular CME/CE Activity, or JHI, on its behalf, will provide the Provider/Partner with the name, street address, e-mail address, profession and specialty of each person who participated in that CME/CE Activity.
- **Affiliates and others.** The owner of each CME/CE Site may provide your PII to its affiliates and others who may use it to send you information about goods and services in the optical and healthcare industries.
- **Other CME/CE providers.** The owner of any CME/CE Site on which you participate in a CME/CE Activity may share your PII with third parties who offer CME/CE Activities.
- **Merge/purge providers.** The owner of any CME/CE Site 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 for a merge/purge operation.

## Disclosure for legal reasons

- **Safety.** The owner of any CME/CE Site may disclose your PII to protect the safety, rights, or property of the public, any person, the owner of such CME/CE 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 CME/CE Site and/or JHI believes is required by law, regulation, or legal process.
- **Bankruptcy.** If the owner of any CME/CE Site or JHI engages in a merger, acquisition, disposition, change of control, bankruptcy, dissolution, reorganization, or similar transaction or proceeding, or otherwise transfers the operations of such CME/CE Site that relates to your PII, JHI will transfer your PII to the successor entity.

**Rights of California residents.** If you are a California resident and you want to find out the names of any information brokers or any other third parties with whom we share your PII under California Privacy (Cal. Bus. & Prof. Code § 22575 et seq.), send a request to [chiefprivacyofficer@jhihealth.com](mailto:chiefprivacyofficer@jhihealth.com) and within thirty (30) days, we will provide you with that information.

**Other kinds of identifying information collected.** There are various ways in which non-PII is or may be collected as a result of your visits to a CME/CE Site.

- We automatically collect and store information about your use of the CME/CE Sites, such as your engagement with a particular CME/CE Activity, including whether you took a particular test, whether you completed that test, whether the test was free or paid, and what the topic was, and how often and when you engage with any CME/CE Site.
- We also collect information about your device when you access any CME/CE Site, including IP address, browser information (including referring URL), cookie information and advertising ID (which is a unique, user-resettable identification number for advertising associated with a mobile device), all of which may be associated with information we have about your use of the CME/CE Sites.
- For more detailed information about how we may use cookies and other technologies to collect information that is not PII on the CME/CE Sites, see our [Cookie Policy](#).

## Storage of information

- We store information that we collect on the CME/CE Sites on our own servers and/or on servers operated by third parties. Currently, these third-party servers are located in the United States but in the future, we may use third-party servers that are located in other countries or in other jurisdictions. You consent to have your PII and the other information that may be collected when you use any CME/CE Site collected, stored and processed on servers in the United States and other countries and jurisdictions. If you back up your PII on your computer, then you consent to have your PII stored and processed on the servers, services and/or other devices you choose for that purpose.

## Protection of information

- We use SSL certificates to protect your personal information as you transmit it from your computer to the CME/CE Sites and to protect your information from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. We also use a software program to stop certain kinds of attacks. But no Internet transmission is ever 100% secure or error-free. In particular, e-mail sent to a CME/CE Site may not be secure. Be careful about sending us any confidential information.
- We will retain your PII for the period necessary to fulfill the purposes outlined in this Privacy Policy or our data retention policies unless a longer retention period is required by law.
- The CME/CE Sites may contain links or references to other sites in addition to the ones we have already mentioned. Please be aware that we do not control such other sites and that, in any case, this Privacy Policy does not apply to those sites. We encourage you to read the privacy policy of every site you visit.

## Transfer of information

- We may transfer information that we collect about you, including PII, to affiliated entities, or to other third parties across borders and from your country or jurisdiction to other countries or jurisdictions around the world.
- If you are located in the European Union or other regions whose laws governing data collection and use may differ from the laws of the United States, please note that we may transfer information, including PII, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction, and you consent to the transfer of information to the U.S. or any other country in which we or our service providers maintain facilities.

## Children

- We do not knowingly collect PII from anyone under 13. If we become aware that a child under 13 has provided us with PII, we will take steps to remove such information and terminate the child's account.
- If you are a parent and you become aware that your child has provided us with PII without your consent, please contact us at [chiefprivacyofficer@jhihealth.com](mailto:chiefprivacyofficer@jhihealth.com) and we will take steps to remove such information and close the child's account.

## Management of information

- You can change PII you have provided in connection with CME/CE Activities by going into your online account. If you need help, email [cecustomerservice@jhihealth.com](mailto:cecustomerservice@jhihealth.com) or call the customer service department at (800) 825-4696 est. 9am – 5pm EST Monday-Friday.

## Contacting Us

- For questions about this Privacy Policy and how your PII may be collected, stored, used, and shared, please contact our Privacy Office by email at [chiefprivacyofficer@jhihealth.com](mailto:chiefprivacyofficer@jhihealth.com).
- If you are from the European Economic Area, in accordance with applicable data protection law, you have the right to (i) access PII that we have about you; (ii) have your PII corrected or deleted; (iii) in certain circumstances, object to our processing of your PII; (iv) withdraw consent previously provided; (v) in certain circumstances, request that your PII be transferred to another service provider, where feasible; or (vi) if you believe that we have not complied with applicable data protection law, lodge a complaint with your local supervisory authority. If you wish to exercise any of these rights, please contact our Privacy Office by email at [chiefprivacyofficer@jhihealth.com](mailto:chiefprivacyofficer@jhihealth.com).

### **Changes to this Privacy Policy**

- We reserve the right to modify this Privacy Policy at any time and any changes will be effective upon posting of the modified Privacy Policy unless we advise otherwise. If we make any material changes to this Privacy Policy we will notify you by email to the email address included in your account profile and/or by means of a notice on the CME/CE Sites before the change becomes effective. We encourage you to periodically review this Privacy Policy for the latest information on our privacy practices. By continuing to use the Services after changes are made to this Privacy Policy, you agree to such changes.
- This Privacy Policy was last updated on **July 23, 2018**. Prior versions: 20/20 Site: May 1, 2017, May 25, 2011; CMEU Site: July 2, 2015, April 4, 2014; ICPME Site: June 14, 2018, December 9, 2013; Power-Pak Site: April 17, 2017, May 24, 2012; RGVCE Site: May 9, 2018 (Predecessor sites: Review of Optometry Site: March 23, 2017, April 19, 2012; Review of Ophthalmology Site: October 9, 2010)