

## **PRIVACY POLICY**

Welcome to [www.uspharmacist.com](http://www.uspharmacist.com). This site (the "USP Site") is owned by Jobson Medical Information LLC ("JMI"), which publishes *U.S. Pharmacist*<sup>®</sup>. JMI is a subsidiary of Jobson Healthcare Information LLC ("JHI"). JHI provides circulation, marketing and IT (tech) support services to JMI as well as CE customer support on JMI's behalf to people taking CE tests. This privacy policy ("this Privacy Policy") explains the policies and practices of JMI and JHI ("we" or "us") regarding collection, use, and disclosure of personally identifying information that you may provide through the USP Site.

### **Collection of personally identifying information**

- When you subscribe to *U.S. Pharmacist*<sup>®</sup>, you will be taken to the site of our fulfillment house, Cambey & West, where you will be asked for your first and last name, title, company name, address, phone number, and e-mail address.
- When you sign up to take CE activities on the USP Site, 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. If you are a member of NABP, we ask you for your unique NABP e-Profile ID (or "e-PID number") and your date, month and year of birth. We also ask you for a credit card, but when you provide that information, you will actually be redirected to the site of our third-party credit-card processor, authorize.net, whose privacy policy can be found here: <http://www.authorize.net/company/privacy/>.
- If you sign up for our Continuing Education E-Mail Newsletter, you will be asked for your first and last names, address, e-mail address, and cell phone number.

### **Use of personally identifying information from subscriptions**

- JHI's fulfillment house stores all the information that you enter on the online subscription form, uses that information to provide you with the publications to which you have subscribed, and makes that information available to JHI to carry out its circulation and marketing activities.
- JHI and/or our fulfillment house may use your e-mail address to send you renewal subscription forms by email and to send you newsletters from JMI and its affiliates about developments and opportunities in the pharmacy and pharmaceutical industries.
- We also may use your email address to send you short surveys that ask your opinions on various topics related to the industry.

### **Use of personally identifying information from CE activities**

- When you participate in a CE activity, JHI will use your name and address to grade your post-activity test and to send you a print statement of credit for the CE activity if you so request. If JHI uses a third-party company to grade your post-activity test and issue statements of credit, JHI will give your name and

address to that company for that purpose only. If you are a member of NAIB, we also will notify NAIB that you passed the test, but we will identify you only by your NAIB number.

- If you authorize us to use your e-mail address to send you information about CE programs and pharmaceutical developments, JHI will use your e-mail address to send you JMI's CE Mail Newsletter, JMI's *U.S. Pharmacist*<sup>®</sup> eFlash<sup>™</sup> newsletter, and *e-pharm/alert*<sup>®</sup>, a promotional service of Alert.

## **Disclosure and sharing of personally identifying information collected on the USP Site**

- **Disclosure to service providers.** We may provide your personally identifying information and other information that we collect to third-party service providers, if any. Service providers' access to your personally identifying information is limited to the information reasonably necessary for them to perform their limited functions. Disclosure to service providers includes the following situations:
  - JHI's fulfillment house will share your name and street address with its print vendor, who will use it to send you the print edition of *U.S. Pharmacist*<sup>®</sup>.
  - JHI may share your name and street address with (i) its direct mail vendors (who are engaged on a job-to-job basis), who may send you subscription renewal forms by mail, (ii) the outsourced print production house of our affiliate Alert Marketing, Inc. ("Alert") and its mail houses, which may send you print mailings about pharmacy products and services that are offered by third parties that may be of use to you, and (iii) JHI's list vendor, which may include your name and street address in lists that it markets and rents to third parties.
  - If you provide your e-mail address when you subscribe to *U.S. Pharmacist*<sup>®</sup>, JHI may forward your e-mail address to JHI's list vendor, to use to send you e-mail promotional messages for other products and services offered by other companies, or to another service provider to send you surveys that ask your opinion about topics in the industry.
  - If you provide your telephone number when you subscribe to *U.S. Pharmacist*<sup>®</sup>, JHI may share it with (i) telemarketing companies (who are engaged on a job-by-job basis) who may use it to solicit renewals of your subscription, and (ii) JHI's list vendor, who may include the phone number along with your name and address in lists that it rents to third parties. You do not have to provide your telephone number to subscribe to *U.S. Pharmacist*<sup>®</sup>.
- **Disclosure to commercial supporters of CE activities.** On occasion, the commercial supporter of a CE activity (the "Supporter") will ask us for a list of the people who participated in that activity, so that it can comply with applicable

laws or document the first level of outcomes-based evaluation in CE (i.e., the profile of the learner's that participated, to include a summary of which medical specialties/practices were represented, how this compares to the target audience, and whether the activity needs to be repeated because significant numbers of the target audience did not participate). If the Supporter only wants information to document the first level of outcomes-based evaluation, we will provide the Supporter with a summary of the learner profile that participated in the activity, but we will not provide your personal information. If the Supporter is asking for information that it needs to comply with applicable laws, and in particular, the federal "Sunshine Act," we will provide your first, middle and last name and your street address, and the fact that you participated in this particular CE activity.

- **Disclosure to third-party CE providers and education partners.** On occasion, the third-party provider or education partner of a CE activity on the USP Site (the "Provider/Partner") will ask us for a list of the people who participated in a particular CE activity that the Provider/Partner prepared or accredited, for the Provider/Partner's record-keeping purposes only. In response to such a request, we will provide the Provider/Partner with the name, street address, e-mail address, profession and specialty of each person who participated in that CE activity.
- **Disclosure to affiliates and others in the pharmacy field.**
  - If you provide your email address when you subscribe to *U.S. Pharmacist*<sup>®</sup>, we may provide your e-mail address to our affiliates and others in the pharmacy field who offer products and services that may be of use to you. In addition, on occasion, JHI, JMI or Alert may send a list that includes your e-mail address to a third-party agency, vendor, or client for a merge/purge operation.
  - If you authorize us to use your e-mail address to send you information about CE programs and pharmaceutical developments, JHI may provide your e-mail address to its other affiliates and others in the pharmacy field who offer products and services that may be of use to you, such as Postgraduate Healthcare Information, LLC ("PHE"), which accredits our CE activities and also produces Power-Pak C.E.<sup>®</sup> continuing education programs.
- **Disclosure for legal reasons**
  - We may disclose your personally identifiable information to protect the safety, rights, or property of the public, any person, JMI, JHI, or any of their affiliates; to investigate, prevent, or otherwise address suspected fraud, harassment or other violations of any law, rule or regulation or our Terms of Use (if any); to detect, prevent or otherwise address security or technical issues; or as we believe is required by law, regulation, or legal process.

- If JMI 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 the USP Site that relates to your personally identifying information, JHI will transfer your personally identifying information 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 personally identifying information 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-personally identifying information is or may be collected as a result of your visits to the USP Site.

- **General**

- **Log files:** Log files are text files that a website automatically creates whenever someone accesses it. They record the requests made to the site's web server. Log files record information such as your browser type, IP address and referring website.

- **Cookies**

- **Generally.** A cookie is a small data file that a website transfers to a user's hard drive when a user visits the website. A cookie file can contain information such as a unique ID that the website uses to track the pages visited, and is a standard method of registering website user preferences. These preferences are stored in a file on your computer's hard disk drive. Cookies make it easier for you to use a website by enabling you to access your information when you "sign in" to your account, to make purchases and move uninterrupted between site areas. Cookies also enable search engines (such as Google<sup>®</sup> and Yahoo<sup>®</sup>), advertisers, and others to track your visits to and through different websites.
- **Specific.** We use Google<sup>®</sup> Analytics. Google tracks where you go on the USP Site and combines that information with information that Google may have about you through your Google account (if you have one) and/or through your use of other websites that use Google Analytics. Google and its affiliates may use cookies to serve advertisements about goods and services of interest to you on the USP Site and on other sites that you visit.

- **Web beacons**

- A web beacon is an object embedded in a web page used to monitor the behavior of the user visiting the website. It usually consists of a single-pixel image that is used in combination with a cookie or cookies. A web beacon or pixel tag can be placed on a web page or in an email to transmit information.
- If you visit the USP Site from a third-party site, that site may use beacons to monitor your visit to the USP Site. For example, the Facebook “like” button uses certain technologies together with cookies to track your online activity when you “like” online content. We do not have access to or control over beacons that third parties may be using and this privacy policy does not cover their privacy practices. We suggest you review the privacy and security policies of any site you are on so that you know whether this may happen.

### **Do Not Track signals.**

- With some browsers, it is possible for a user to activate a “Do Not Track” signal, to indicate that the user does not want to be tracked across the Websites that the user visits.
- The USP Site does not honor Do Not Track signals. In other words, if you have activated a Do Not Track signal in your own browser, the USP Site will not block tracking by Google or its affiliates of your activity on the USP Site.

### **Limiting the collection and use of information about your online activities**

- You can set your browser to accept all cookies, to reject cookies, or to notify you whenever a cookie is offered so that you can decide each time whether to accept it. Rejecting a cookie, however, may preclude you from using, or may negatively affect the display or function of, some sites, or certain areas or features of some sites. To learn more about cookies, including how to enable cookies, change your browser settings and find and delete cookies on your hard drive, please refer to your web browser's help menus or visit [www.allaboutcookies.org](http://www.allaboutcookies.org). There are also various apps that interfere with or block cookies.
- You can opt out of having your Web viewing data collected and used for interest-based online advertising by certain companies at <http://www.aboutads.info/choices/> and <http://www.youronlinechoices.eu>.
- If you do not want your data collected with Google Analytics, you can install the Google Analytics opt-out browser add-on. This add-on instructs the Google Analytics JavaScript (ga.js, analytics.js, and dc.js) running on websites to prohibit sending information to Google Analytics. To opt out of Google Analytics, visit the [Google Analytics opt-out page](#) and install the add-on for your browser. For more details on installing and uninstalling the add-on, please see the relevant help resources for your specific browser. Updates to your browser or

operating system may affect the functionality of the opt-out add-on. You can learn about managing add-ons for Chrome [here](#). If you are not using Chrome, check directly with the manufacturer of your browser to determine whether add-ons will function properly on the browser version that you are using.

### **Storage of information**

- We store information that we collect on the USP Site on our own servers and/or on servers operated by third parties. These servers may be located in the United States or in other jurisdictions.

### **Protection of information**

- We use SSL certificates to protect your personal information as you transmit it from your computer to the USP Site 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 the USP Site may not be secure. Be careful about sending us any confidential information.
- We will retain your personally identifying information 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 USP Site 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 personally identifying information, 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 personally identifying information, 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 personally identifying information from anyone under 13. If we become aware that a child under 13 has provided us with personally identifying information, 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 personally identifying information 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**

- To keep your personally identifying subscription information accurate, current, and complete, contact [uspharmacist@CambeyWest.com](mailto:uspharmacist@CambeyWest.com). You can change personally identifying information you have provided in connection with CE tests by going into your online account.

### **Changes to this privacy policy**

- If this privacy policy changes, the revised policy will be posted here. Please check back periodically, and especially before you provide any personally identifying information.
- This privacy policy was last updated on January 19, 2017.