

## **PRIVACY POLICY**

Welcome to <http://disclosure.pimed.com/> (the "**Disclosure Site**"). You are here because you received an email about your planned participation as an instructor, planner, or manager for CME/CE activities (the "**CME/CE Activities**"). On this Site, you will be able to complete the financial disclosure requirements for your participation in those CME/CE Activities.

The Disclosure Site is operated by Postgraduate Institute for Medicine, Inc. ("**PIM**"), a subsidiary of Jobson Healthcare Information LLC ("**JHI**"). JHI provides IT and administrative support to PIM. This privacy policy explains the practices of PIM and JHI regarding collection, use, and disclosure of personally identifying information that you may provide through the Disclosure Site and other information that we collect passively when you use the Disclosure Site.

### **Personally identifying information collected on the Disclosure Site**

- You will be asked for your name and email address. If you have previously submitted a bio, this information may have been filled in before you log on to the Disclosure Site.
- If you are a Federal employee or Military services member, you may be asked for your Service and Military Treatment Facility (MTF) affiliation.
- If you are in a professional field that requires you to have a license number, you may be asked for your license number.

### **Use of the personally identifying information that is collected on the Disclosure Site**

- The personally identifying information that you provide on the Disclosure Site will be used by PIM or its education partner ("**Education Partner**") to identify you for the purpose of reviewing and assessing your fulfillment of the financial disclosure requirements for CME/CE Activities.

### **Disclosure of personally identifying information to third parties**

- **Education Partners.** The personally identifying information that you provide through the Disclosure Site will be shared with each Education Partner who is producing or coordinating the CME/CE Activities in which you are serving as an instructor, planner, or manager.
- **Agents and contractors.** We may provide your personally identifying information to service providers who work on our behalf or help us to operate the Disclosure Site. Access to your personally identifying information by these service providers is limited to the information reasonably necessary to perform their limited functions.

- **Disclosure for legal reasons**

- We may disclose your personally identifiable information to protect the safety, rights, or property of the public, any person, PIM, 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 we believe is required by law, regulation, or legal process.
- If PIM 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 Disclosure 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 identifying information collected on the Disclosure Site**

- Besides collecting personally identifying information that you provide when you serve as an instructor, planner, or manager in CME/CE Activities, we use Google<sup>®</sup> Analytics cookies to recognize and count the number of visitors to the Disclosure Site and to see how visitors move around the Disclosure Site when they're using it.
- 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](#).
- Generally, 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. You can learn how to do this by reviewing your web browser's help menu or at [www.allaboutcookies.org](http://www.allaboutcookies.org). You can also use various browser plug-ins, such as NoScript, Ghostery, Lightbeam, Firecookie, and Do Not Track Plus, to view and control cookies. Rejecting a cookie, however, may preclude you from using, or may negatively affect the display or function of, the Disclosure Site or certain areas or features of the Disclosure Site.

## 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 Disclosure Site does not respond to Do Not Track signals. In other words, if you have activated a Do Not Track signal in your own browser, the Disclosure Site will not block tracking by third parties of your activity on the Disclosure Site.

## Managing your personally identifying information on the Disclosure Site

- To keep your personally identifying information accurate, current, and complete, you can update your profile on the Disclosure Site, e-mail [CMEU@pimed.com](mailto:CMEU@pimed.com), or call **303-799-1930**.

## Security

- We will retain your personally identifying information only as long as we need to in order to enable you to use the Disclosure Site, to fulfill the purposes outlined in this privacy policy, to comply with our internal data retention policies, or as long as may be required by law.
- We work to protect the security of your personally identifying information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input. We also take precautions, including the deployment of technological resources and the use of firewalls, systems and procedures, to protect the security of your personally identifying information.
- No Internet transmission is ever 100% secure or error-free. Keep secure any passwords, ID numbers, or other special access features that you use on the Disclosure Site.
- The Disclosure Site may contain links or references to other websites. Please be aware that we do not control such other websites and that, in any case, this privacy policy does not apply to those websites. We encourage you to read the privacy policy of every website you visit.

## 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 **June 16, 2015**.