

# PRIVACY POLICY

## 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 “Covered Sites”). The information, products and services that are made available to users of the Covered Sites, including but not limited to editorial content, applications, sponsored programs, advertising, email communications, digital product demonstrations, market research opportunities, and discussion forums, will be referred to as the “Services.”

- **Periodical Publication Sites**

- [www.2020mag.com](http://www.2020mag.com) (the “20/20<sup>®</sup> Site”). The 20/20 Site is owned by Jobson Medical Information LLC (“JMI”).
- [www.LabTalkonline.com](http://www.LabTalkonline.com) (the “LabTalk<sup>®</sup> Site”). The LabTalk Site is owned by Frames Data Inc. (“FDI”), a subsidiary of JMI.
- [www.retina-specialist.com](http://www.retina-specialist.com) (the “Retina Specialist Site”). The Retina Specialist Site is owned by JMI.
- [www.reviewofcontactlenses.com](http://www.reviewofcontactlenses.com) (the “RCCL Site”). The RCCL Site is owned by JMI.
- [www.reviewofophthalmology.com](http://www.reviewofophthalmology.com) (the “Review of Ophthalmology<sup>®</sup> Site”). The Review of Ophthalmology Site is owned by JMI.
- [www.reviewob.com](http://www.reviewob.com) (the “Review of Optometric Business<sup>™</sup> Site”). The Review of Optometric Business Site is owned by JMI.
- [www.reviewofoptometry.com](http://www.reviewofoptometry.com) (the “Review of Optometry<sup>®</sup> Site”). The Review of Optometry Site is owned by JMI.
- [www.uspharmacist.com](http://www.uspharmacist.com) (the “USP Site”). The USP Site is owned by JMI.
- [www.visionmonday.com](http://www.visionmonday.com) (the “Vision Monday<sup>®</sup> Site”). The Vision Monday Site is owned by JMI.
- [www.womeninoptometry.com](http://www.womeninoptometry.com) (the “Women in Optometry Site”). The Women in Optometry Site is owned by JMI.

- **Frames Data<sup>®</sup> Site**

- [www.framesdata.com](http://www.framesdata.com) (the “Frames Data<sup>®</sup> Site”). The Frames Data Site is owned by FDI.

- **Jobson Creative, Jobson Interactive and Jobson Research sites**

- [www.jobsoncreative.com](http://www.jobsoncreative.com) (the "Jobson Creative Site"). The Jobson Creative Site is owned by JMI.
- [www.jobsoninteractive.com](http://www.jobsoninteractive.com) (the "Jobson Interactive Site"). The Jobson Interactive Site is owned by JMI.
- [www.jobsonresearch.com](http://www.jobsonresearch.com) (the "Jobson<sup>®</sup> Research Site") The Jobson Research Site is owned by JMI.

○ **Alert Marketing Sites**

- [www.alertmarketing.com](http://www.alertmarketing.com) (the "Alert Marketing Site"). The Alert Marketing Site is owned by Alert Marketing, Inc. ("Alert"), a subsidiary of JMI.
  - [www.mdalert.com](http://www.mdalert.com) (the "M.D./alert Site"). The M.D./alert Site is owned by Alert.
- Each Covered Site is owned by a subsidiary of Jobson Healthcare Information LLC ("JHI"), which provides circulation, marketing, and IT services to all the Covered Sites.
  - The words "we" or "us" in any paragraph of this Privacy Policy will refer to the owner of the Covered Site whose practices are being discussed in that paragraph.
  - By providing the PII that is described below on or through any Covered Site, you expressly consent to that Covered Site's collecting that PII and to its using, storing and sharing that PII as provided in this Privacy Policy.

**Data Controller**

- The Data Controller of each Covered Site is the company that owns that Covered Site and/or JHI.
- JHI, JMI and FDI are located at 440 9<sup>th</sup> Avenue, 14<sup>th</sup> Floor, New York, New York 10001, 212-274-7000. After **December 1**, 2018, those companies will be located at 395 Hudson Street, 3rd Floor, New York, NY 10014.
- Alert Marketing is located at 160 Chubb Avenue, Suite 304, Lyndhurst, NJ 07071.

**Collection of PII**

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

**PII 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 PII 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](http://www.reviewsce.com), where any PII 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](http://www.cvent.com)), which will ask you for certain PII that it needs to register you for whatever event you wish to attend. Any PII you may provide on the Cvent will be subject to the privacy policy on the page where you provide your PII.

### **PII collected on the Frames Data® Site**

- **Publications:** You will be asked to provide your name, email address, and other items of PII, 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 PII 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.
  - Request technical support.
- **Software:** 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.
  - To ask for a demonstration CD-ROM or DVD for a Frames Data® digital product

- **My Frame Gallery™:** 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 PII you will be asked to provide will depend on which items of PII your eye care practitioner ("ECP") chose to ask for when your ECP set up its version of My Frame Gallery.

### **PII collected on the Jobson Interactive and Jobson Research sites**

- **Jobson Interactive Site:** If you sign up either for the Jobson Interactive marketing email list or the Eyefind® email list, you will be asked for PII that includes your name, email address and other PII 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.
- **Jobson Research Site.** When you buy a product on the Jobson Research Site for the first time, you will be asked for PII that includes your name, address, and email address.

### **PII collected on the Alert Marketing Sites**

- **Alert Marketing Site**
  - 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 PII 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.
- **M.D./alert® Site**
  - 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 PII.
  - 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 PII you provide there will be subject to the privacy policy of that website.

### **PII collected on Covered Sites in other ways**

- **Contact Us Buttons.** If you use a “contact us” button on any Covered Site, we will receive your email address and whatever PII is in your email.
- **Job Postings.** If you post a job on any Covered Site, you will be taken to [www.LocalEyeSite.com](http://www.LocalEyeSite.com) and whatever PII you provide will be treated according to the privacy policy of that site.

### **Use of PII collected on the Covered Sites**

- **“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 PII 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 PII 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 PII 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 PII 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. (Also see below concerning disclosure to third parties in the course of business operations.)
- **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 PII 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 PII will be governed by the privacy policy on your ECP’s site.

### **Disclosure of PII collected on the Covered Sites**

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

## Disclosure of PII to third parties in the course of business operations

- **Service Providers.** The owner of each Covered Site and/or JHI may provide your PII 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 PII is limited to the information reasonably necessary to perform their limited functions.
- **Affiliates and others.** The owner of each Covered Site may provide your PII 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*<sup>®</sup> 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.

## Disclosure for legal reasons

- **Safety.** The owner of any Covered Site may disclose your PII 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.
- **Change in control.** If the owner of any Covered 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 Covered 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 Statute (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 Covered Site.

- We automatically collect and store information about your use of the Covered Sites and the Services you receive through those sites, such as your engagement with particular content, including whether you opened a particular banner ad or email, what the topic was, and how often and when you engage with any Covered Site.
- We also collect information about your device when you access any Covered 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 Covered Sites.
- For more detailed information about how we may use cookies and other technologies to collect information that is not PII on the Covered Sites, see our [Cookie Policy](#).

### **Storage of information**

- We store information that we collect on the Covered 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 Covered Site collected, stored and processed on servers in the United States and other countries and jurisdictions.

### **Protection of PII**

- We use SSL certificates to protect your PII as you transmit it from your computer to the Covered 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 Covered 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 Covered 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 some Covered Sites by going into your online account on that Covered Site.
- 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).

- 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).

### **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 PII.
- This Privacy Policy was last updated on **September 6, 2018**.
- Prior versions:

20/20 Site: May 1, 2017; 2011

Alert Marketing Site: May 8, 2014

Frames Data Site: December 21, 2017; May 29, 2014

Jobson Creative Site: None

Jobson Interactive Site: March 7, 2012

Jobson Research Site: September 17, 2010

LabTalk Site: May 5, 2014

M.D./alert Site: March 30, 2015

Opticians Handbook Site: October 22, 2010

RCCL Site: February 23, 2009

Retina Specialist Site: None

Review of Optometric Business: October 22, 2010

Review of Optometry Site: March 23, 2017, April 19, 2012;

Review of Ophthalmology Site: October 9, 2010

USP Site: January 19, 2017; February 27, 2014

Vision Monday Site: May 5, 2017

Women in Optometry Site: None