

# Privacy Policy

Effective Date: January 1, 2020

W2O Group takes privacy matters seriously and wants you to be familiar with how we collect, use and disclose data. This Privacy Policy describes our practices regarding information that we or third-party service providers collect through certain of our owned or controlled websites and web properties including mobile versions of these websites (collectively, the “**Properties**”) and through the provision of our market research and insight services to our clients (“**Research Services**”). By using the Properties, you agree to the terms and conditions of this Privacy Policy.

This Privacy Policy does not address, and we are not responsible for, the privacy, information or practices of any third party. In addition, the inclusion of a link on any Property does not imply endorsement of, or affiliation with, the linked site or Property by us or our affiliates. Please note that the Properties may include the ability to access and submit (including, for example, via a third-party software application or service that is available through or in connection with a Property) certain information directly to third parties. Read other companies’ privacy policies carefully. We are not responsible for these third parties.

**These Properties are Not Intended for Children:** Our sites are meant for adults. We do not knowingly collect personally identifiable information from children under 13 without permission from a parent or legal guardian. If you are a parent or legal guardian and think your child under 13 has given us information, you can email us at [privacy@w2ogroup.com](mailto:privacy@w2ogroup.com). You can also write to us at the address listed at the end of this Policy. Please mark your inquiries “COPPA Information Request.” Parents, you can learn more about how to protect children’s privacy on-line [here](#).

## Updates To This Privacy Policy

From time to time we may change our privacy policies. We will notify you of any material changes to our Policy as required by law. Any changes to this Privacy Policy will become effective when we make the revised Privacy Policy available on or through a Property. Your use of such Property or your submission of any information in connection with the Properties following such changes means that you accept the revised Privacy Policy.

## Information We Collect

We and third-party service providers may collect information from you when you interact with the Properties including when you, for example, post on a public space on our Properties, make a request, register for newsletters or other communications through the Properties, participate in surveys or in a blog, submit a job application, as part of employee onboarding or when you contact us. We may also collect information from you if you attend our trade shows or events.

We and third-party service providers may collect and share information including:

Category of Information	Source of Information and Business Purpose	Categories of Third Parties with whom we share
Identifiers such as a real name, postal address, unique personal identifier, email address, social security number, or other similar identifiers	Directly from you in the case of sign-ups for newsletter or events, or applications for employment  From publicly available sources such as social media where permitted by law for research purposes	Service Providers  W2O Clients

<p>Professional or employment-related information</p> <p>Education information</p> <p>Age, Date of Birth and other biographic data</p> <p>Demographic information and other non-personally identifiable information provided by you.</p> <p>Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, preferences, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>		
<p>Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement, browser and device information including mobile device type, mobile network, IP address used to connect your computer or device to the Internet, browser type and version, time zone setting, browser plug-in types and versions and operating system</p> <p>Information about how you use the Properties.</p>	<p>Collected when you interact with our internet properties, or the internet properties of W2O Clients, for the purposes of research and direct marketing</p> <p>From publicly available sources such as social media where permitted by law for research purposes</p> <p>From Service Providers and Vendors for the purposes of direct marketing such as online advertising</p>	<p>Service Providers</p> <p>W2O Clients</p>

<p>Geographic location information – identifying only city level, state and country.</p> <p>Information collected through cookies, pixel tags and other tracking technologies – see our <a href="#">Ad and Cookie Policy</a> for more detail.</p>		
---	--	--

We collect information about users over time when you use the Properties. We may use tracking tools like browser cookies and web beacons. We may do this on our Properties and in emails that we send to you. We may have third parties collect information this way on our behalf – see our [Cookie Policy](#) for more details. Or we may combine information we get from a third party with information we already have. Our business partners, vendors, and clients may give us information about you.

To learn more about these tools and uses of information about you, please read our [Ad and Cookie Policy](#).

In connection with our Research Services, we collect information relating to doctors, other health professionals, patients and influencers through our arrangements with social media platforms (in particular Twitter and LinkedIn) about the health-related and medical topics they are interested in and what they have to say about them, and we may categorize them in our own databases according to their areas of interest. We also use third party platforms who collect information from social media platforms, like Sysomos whose privacy policy you can find here: <https://sysomos.com/privacy-policy/>, and for specific projects we may get personal information on relevant individuals from our clients, which we only use for the purposes of Research Services for that client

# Research Services

As part of our Research Services, including our health ecosystem mapping business, MDigital Life - <http://mdigitallife.com/> - we provide market research and insight to life sciences, pharmaceutical and medical devices companies. To do this, we collect and retain publicly available information relating to doctors, other medical professionals, experts and influencers, patients, advocacy organizations and reporters from various sources, including social media platforms like Twitter and LinkedIn, third party . This information typically comprises:

- In relation to medical professionals, their name, contact detail, hospitals, universities or other institutions they work for or are affiliated with, their area of specialization and, where publicly available, their prescribing record and other elements of their professional practice.
- In relation to any individual, including patients, the information they decide to make available online, including through social media (and in particular Twitter and LinkedIn), and typically comprising their name, social media handle, medical condition and/or treatment (where a patient), relevant public posts and views on matters relevant to health, medical treatment, procedures and responses and reactions to them and their digital footprint (the range, subject matter focus and other details of their influence and visibility online)
- W2O does not collect or use the data of anyone under the age of 18 without the affirmative action of a parent or guardian or as otherwise permitted by law.

## How We Use Data

We and third-party service providers may use information:

- To respond to your inquiries and fulfill your requests.
- To administer sweepstakes, contests and other promotions.
- To send you administrative information, including information regarding the Properties.
- To send to you, through us or third-party service providers, marketing communications that we believe may be of interest to you.
- For our business purposes including, without limitation, data analysis, product development, enhancing the Properties, improving our services, processing applications and determining the effectiveness of promotional campaigns.
- As we believe necessary or appropriate: (1) under applicable law; (2) to comply with legal processes; (3) to respond to requests from public or government authorities; (4) to protect our rights, privacy, safety or property, or that of our affiliates, you or others; or (5) to allow us to pursue available remedies or limit the damages that we may sustain.

- In providing the Research Services, we analyze the public postings and comments of individuals whose data we process and extract observations and learnings about trends, sentiment, and changes in health practice which are generally used by our clients to assist in their marketing and medical communications, clinical trial recruitment, risk and reputation management and investor relations.
- For other reasons we may describe to you.

## How Information may be disclosed

Information may be disclosed:

- To third-party service providers who provide services such as data analysis, order fulfillment, IT services, customer service, email delivery and other similar services to enable them to provide such services. For instance, we use Google Analytics to collect information about how visitors use our site, including clicks, page bounce rate, page views, how users navigate through our site, length of visits to certain pages, length of video watching, submitting form on our contact page. We use the information to compile reports and to help us improve the site. Google Analytics uses cookies which collect information, including the number of visitors to the site, where visitors have come to the site from and the pages they visited. Our Box.com hosts our main business applications which host personal data for which we are responsible. [Box.com](#) has Binding Corporate Rules and is also Privacy Shield certified. For more information, see <https://cloud.app.box.com/v/BoxProcessorBCRs>. We use Amazon Web Services (AWS), to host personal data including some of the databases used in our Research Services. We have a data processing addendum for EU data with AWS which has been approved by EU data protection authorities. AWS is also Privacy Shield-certified. You can find out more about AWS here: <https://aws.amazon.com/compliance/eu-us-privacy-shield-faq/>
- To providers who facilitate you making online applications for jobs with us via our Properties, including Greenhouse Software (<https://www.greenhouse.io>) and EnBoarder (<https://enboarder.com>). They use your data under their own privacy policies accessible at <https://www.greenhouse.io/legal> and <https://enboarder.com/privacy> respectively.
- When permitted by law, to our affiliates (including within our W2O Group of companies), business partners and clients, to permit them to send communications such as marketing content, information on co-sponsored programs and details on events and products (subject always to users' rights to control our sending of promotional communications where required by law).
- With third party social media, analytics and digital advertising partners whose technologies interact with our Properties and who support our operation of the Properties and who also collect non-identifiable information about you and use it for their own purposes and those of their other clients (including to support interest-based advertising). Please our [Ad & Cookies Policy](#) to understand more about these relationships and how you can opt-out of this data sharing.
- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceeding).
- As we believe necessary or appropriate: (1) under applicable law; (2) to comply with legal processes; (3) to respond to requests from public or government authorities; (4) to protect our rights, privacy, safety or property, or that of our affiliates, you or others; (5) to

allow us to pursue available remedies or limit the damages that we may sustain; (6) to investigate potential fraud, including fraud we think has happened during a sweepstakes or promotion; or (7) to share your information if you are the winner of a sweepstakes or other contest with anyone who requests a winner's list.

## Retention period

We will retain information for the period necessary to fulfill the purposes outlined in this Privacy Policy unless a longer retention period is required or permitted by law.

## Security

**We use standard security measures.** The Internet is not 100% secure. We cannot promise that your use of our sites will be completely safe. We encourage you to use caution when using the Internet. This includes not sharing your passwords.

## Choice And Access

**You have choices about how we use your information.** You may opt-out from receiving marketing-related emails from us and our affiliates: If you do not want to receive marketing-related emails from us and our affiliates on a going-forward basis, you may opt-out from receiving such emails either by using the unsubscribe mechanism provided in the email or by clicking on the link [here](#). We will try to comply with your request(s) as soon as reasonably practicable.

Please note that, if you opt-out as described above, we will not be able to remove your information from the databases of unaffiliated third parties with which we have already shared your information as of the date that we implement your opt-out request.

**You can control cookies and tracking tools.** To learn how to manage how we – and our vendors – use cookies and other tracking tools, and to read our **Do Not Track** policy, please click [here](#).

**You can change or remove your Information and Posted Content.** If you would like to review, correct, update, suppress or delete the information that you have previously provided to us or have made available on a Property, you may contact us using the information below.

Please make clear what information or posted content you would like to have changed or removed. We will try to comply with your request as soon as reasonably practicable, and as required by applicable law. Please note that such request does not ensure the complete or comprehensive removal of information or content posted on a Property as we may need to retain certain information or content for recordkeeping purposes, and there may also be residual information or content that will remain within our databases and other records that will not be removed. We are also not responsible for changing, removing or suppressing information or content from the databases of unaffiliated third parties with which we have already shared your information or content.

**Your California Privacy Rights:** If you reside in California, you have several statutory privacy rights under the California Consume Privacy Act (CCPA).

- **Right to Know:** The categories of personal information we collect is listed on this page in the Information We Collect section. **W2O does not process or sell the information of minors under 18 without affirmative authorization of a parent or legal guardian.**
- California residents have the right to request that we disclose what personal information we have collected, used and sold within the last 12 months. You may request the categories of information, or the specific pieces of information [using this form](#).



- **Right to Delete:** California residents have the right to request the deletion of their personal information. You may submit a deletion request [using this form](#).
- **Right to Opt Out:** California residents have the right to opt out of the sale of their personal information. You may submit an opt out request [using this form](#).
- **Right to Non-Discrimination:** California residents have the right not to receive discriminatory treatment for the exercise of these rights. W2O does not discriminate or change service levels in any way for anyone exercising their privacy rights.
- **Authorized Agent:** California residents have the right to designate an authorized agent in order to make requests under CCPA on their behalf. When using an authorized agent, a notarized statement signed by both you and your designated agent must be provided. Please use [privacy@w2ogroup.com](mailto:privacy@w2ogroup.com) to submit any requests using an authorized agent.

Employees of W2O Group, job applicants, and contractors are currently exempt from CCPA under Assembly Bill 25, except for information category requests.

California residents also have the right to ask us one time each year if we have shared personal information with third parties for their direct marketing purposes. To make a request, please send us an email at [privacy@w2ogroup.com](mailto:privacy@w2ogroup.com) or write to us at the address listed below. Indicate in your letter or email that you are a California resident making a “Shine the Light” inquiry.

## EU users and the General Data Protection Regulation (GDPR)

**Lawful Basis:** Data protection law in Europe contains a number of “lawful bases” – which are legal justifications which mean organizations like us are allowed to have and use personal information. For our EU users and other EU individuals whose personal data we process, we have been careful to ensure we have a lawful basis for all data we have. Our lawful bases include:

- **Legitimate Interest:** We sometimes use your data to pursue our legitimate interests in a way which might reasonably be expected as part of running our business and which does not materially impact your rights, freedom or interests. For example, we will send promotional communications about our service, subject to EU users’ legal rights to control whether we do so. We also collect and use information as part of our Research Services on a legitimate interest basis in order to comply with our contractual commitments to our corporate clients. We also collect information as part of employment application processes.
- Research Service – where EU individuals have posted on social media publicly available details of their medical conditions, treatment, and other health information, this constitutes a “special category” of personal data in respect of which we rely on the lawful basis of legitimate interest for research purposes, and that the data has been manifestly made public by the data subject (Article 9, 2(e)). W2O uses appropriate safeguards including encryption and pseudonymization to protect the data we collect and the rights of data subjects.
- **Consent:** In certain circumstances such as when you sign up for a newsletter or event through our website, when submitting your contact and other information you’ll be asked for your consent for us to process your data for that specific purpose.

In addition, we use various technologies that may include browser cookies and other tracking tools. See our [Cookie Policy here](#) for more information. We give you the ability to personalize

your web experience by choosing to allow (or to block) the use of certain cookies. Click here to access the cookie control tool.

The categories of data we collect are available on this page in the Information We Collect section.

## EU Rights

The GDPR provides several rights to users located in the European Union, including:

- **Right to Be Informed:** You have the right to be informed how we use collect, use and share your personal data. We do this through this privacy policy, and you may request more information through the contact options on this page.
- **Right to Access:** You have the right to access the data about you that we hold.
- **Right to Rectification:** If you believe the data we hold on you is incorrect, you can tell us and we'll correct it.
- **Right to Object and Withdraw Consent:** You have the right to object to the use of your data for direct marketing – in which case you may withdraw your consent by opt out or unsubscribe in the marketing itself. You may also object to our processing in instances where our lawful basis is legitimate interest.
- **Right to Restrict Processing:** There are certain circumstances in which you can request we suspend the processing of your personal data.
- **Right to Erasure (Right to be forgotten):** You have the right to request that we delete your data, and we will do so provided we do not have a legal obligation to keep it.
- **Right to Data Portability:** In cases where we process your information under the legal basis of consent, you can obtain a copy of your data in a commonly used and machine-readable format
- **Rights Related to Automated Decision Making:** W2O does not use automated decision making that has legal or similarly significant effects on you.

To exercise these rights, you may submit an access request via these forms:

- [General consumers](#)
- [Employees, candidates, contractors, vendors and others with a business relationship with W2O](#)

## Cross-Border Transfer

**Note to European users:** the data that we collect from you may be transferred to, and stored at, a destination in the United States of America or elsewhere outside the European Economic

Area (“EEA”) that may not be subject to equivalent data protection laws. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. Where personal data is transferred in relation to providing our services we will take all steps reasonably necessary to ensure that your data is subject to appropriate safeguards and that it is treated securely and in accordance with this privacy policy.

Where W2O or our service providers and consultants process the personal data of EU or UK users outside the European Economic Area, and in particular in the United States our policy is to have an appropriate legal mechanism in place to ensure that transfer of personal data is in compliance with European data protection law, including the use of standard contractual data protection clauses, or in some cases approved certification mechanisms.

## EU supervisory authorities

For our EU users, the **Information Commissioner** is the supervisory authority in the UK and can provide further information about your rights and our obligations in relation to your personal data, as well as deal with any complaints that you have about our processing of your personal data. For EU users outside the UK, you may approach your local data protection authority – see [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

## Controller and Data Protection Officer Contacts

In circumstances where W2O acts as a controller:

W2O Group  
199 Water Street  
14th Floor

New York, NY 10038

Phone: 212-301-7200

Data Protection Officer

Dan Linton – Global Data Privacy Officer

W2O Group

30 S 15<sup>th</sup> St, 11<sup>th</sup> Floor

Philadelphia, PA 19102

Phone: 267-244-1483 Email: [privacy@w2ogroup.com](mailto:privacy@w2ogroup.com)

## Contacting Us

To exercise your rights under CCPA or GDPR, please use the forms linked above. If you have any questions about this Privacy Policy, [please contact us using this form](#).

You may also contact us by email at [privacy@w2ogroup.com](mailto:privacy@w2ogroup.com) or write to the following address:

W2O Group

199 Water Street

14th Floor

New York, NY 10038

Phone: 212-301-7200

You may also call us toll free: 1-800-485-5071

Please note that email communications are not always secure, so please do not include credit card information or other sensitive information in your email messages to us.

© 2020 W2O Group. All rights reserved.