

Privacy Policy

Effective Date: January 12, 2021

W2O Group and our subsidiaries (collectively, “**W2O,**” or “we” – see our [subsidiaries](#) below) take privacy seriously and want 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 or use the contact form below. 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, register to use the services which we market for subscription, 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, or any trade shows or events which we participate in.

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
<p>From you: Identifiers such as a real name, postal address, unique personal identifier, email address, social security number, professional / employment-related information, phone number, authorized users of services,</p>	<p>Directly from you in the case of sign-ups for newsletter or events, applications for employment, or communication you send to us</p> <p>From service providers and vendors for the purposes of</p>	<p>Our affiliates and subsidiaries</p> <p>Service providers and vendors who provide services on our behalf</p> <p>Advertising networks</p>

<p>financial/billing information, or other similar identifiers</p>	<p>direct marketing such as online advertising</p> <p>From service providers and vendors for the purposes of research and analytics</p> <p>From our clients for the purposes of providing marketing and communications services on the client's behalf</p> <p>From our customers for the purposes of providing our services</p>	<p>W2O clients and business partners</p> <p>Government entities, as required by law</p>
<p>From your devices, such as when you visit our Properties:Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a</p>	<p>Collected when you use any part of our services, interact with our internet properties, or the internet properties of W2O Clients, or interact with messages we send you, for the purposes of providing our services, customizing our</p>	<p>Our affiliates and subsidiaries</p> <p>Service providers and vendors who provide services on our behalf</p> <p>Advertising networks</p>

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

Information about how you use the Properties.

Geographic location information - identifying only city level, state and country.

Information collected through cookies, pixel tags and other tracking technologies – see our [Ad](#)

users' visits to our Properties, research, direct marketing, and managing our business

From service providers and vendors for the purposes of direct marketing such as online advertising

W2O clients and business partners

<p>and Cookie Policy for more detail.</p>		
<p>From publicly available sources: Personal data, identifiers and content manifestly made public by individuals including social media identifiers, social media quotes, demographic information, health related information, location information, interest information, professional / employment related information, and any other information you publish on an Internet website that is publicly available, and information we may infer about you from this data.</p>	<p>From publicly accessed sites, such as social media platforms, or public databases where permitted by law for the purposes of providing W2O Research Services.</p>	<p>Our affiliates and subsidiaries</p> <p>Service providers and vendors who provide services on our behalf</p> <p>Advertising networks</p> <p>W2O clients and business partners</p>
<p>From licensed data sources:</p>	<p>From service providers and vendors who license data to</p>	<p>Our affiliates and subsidiaries</p>

<p>Identifiers such as a real name, postal address, unique personal identifier, email address, professional / employment-related information, and phone number.</p> <p>Demographic information.</p> <p>Interest and affinity information.</p> <p>Information collected through cookies, pixel tags and other tracking technologies.</p>	<p>W2O, for the purposes of providing W2O Research Services.</p>	<p>Service providers and vendors who provide services on our behalf</p> <p>Advertising networks</p> <p>W2O clients and business partners</p>
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Information about Sub-processors: Information about our affiliated third-party service providers and sub-processors is available [here](#). We update the information included when new vendors and sub-processors who process personal information are engaged.

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, or we may combine information we get from a third party with information we already have. Our business partners, vendors, and clients may also give us information about you. To learn more about these tools and uses of information about you, please read our [Ad and Cookie Policy](#).

How We Use Data

We and third-party service providers may use information:

- To provide our services, including any obligations arising from any contracts entered into between you and us and to provide you with the information and services that you request from us.
- To process and complete transactions, and send you related information, including purchase confirmations and invoices.
- To respond to your inquiries and fulfill your requests, provide customer service and support, and send you technical notices, updates, security alerts, and administrative messages.
- 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 and other communications that we believe may be of interest to you. You can opt-out of receiving marketing communications from us by contacting us through the Contact Us options provided below or following the unsubscribe instructions included in our marketing

communications. In order to provide certain services to you, you cannot opt out of receiving transaction or service messages from us related to those services.

- For our business purposes including, without limitation, administering our Properties, data analysis, research, product development, integrated marketing, advertising, medical communications, 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; (5) to allow us to pursue available remedies or limit the damages that we may sustain; or (6) to fulfill contractual obligations with our clients or business partners.
- To keep our site and services safe and secure, including to investigate and prevent fraudulent transactions, unauthorized access to the site and services, and other illegal activities.
- 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.

Research Services

As part of our Research Services, we collect and retain manifestly made public 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, as well as other similar third parties. 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, social media information including handles or other identifiers, relevant posts or quotes, or any additional relevant information 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). In some circumstances and when permitted by law, we may also link publicly available social media information with other publicly available or licensed data sets.
- 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.

We obtain third-party content through agreements with certain data providers, who either have a direct relationship with Social Media Authors or who search and index publicly available information (including data) from the Internet. “Social Media Authors” are individuals who are third-party content authors of social media content. We do not attempt to gain unauthorized access to any information and do not circumvent any passwords or other technology protections. We only gather third-party content that is made manifestly available to the public by the site or

by the individual Social Media Author. For specific projects we may receive personal information from our clients, which we only use for the purposes of Research Services for that particular client.

How your 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, online employment applications and other similar services to enable them to provide such services. For more information on our third-party service providers and vendors, please click [here](#).
- When permitted by law, to our clients and business partners as part of our services and deliverables.
- With advertising partners whose technologies interact with our Properties and who support our operation of the Properties and who also collect information about you and use it for their own purposes and those of their other clients (including to support interest-based advertising). Please review 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 lawful requests from public or government authorities, including to meet national security, public interest or law enforcement requirements; (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. In relation to our legitimate interests as it relates to historical and statistical research, and our Research Services, we retain manifestly made public data for as long as it is made publicly available.

Security

We place great importance on the security of the personal data we process. We have security measures in place to protect against the loss, misuse, unauthorized access, disclosure, alteration, or destruction of personal data under our control. For example, our security and privacy policies are periodically reviewed and enhanced as necessary, and only authorized personnel have access to personal data. While we cannot ensure or guarantee that loss, misuse, unauthorized access,

disclosure, alteration, or destruction of information will never occur, we use reasonable efforts to prevent it.

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.

External Links: The Properties may contain links to third-party websites. These links are provided solely as a convenience to you and not as an endorsement by W2O of the contents on such third-party websites. W2O is not responsible for the privacy practices or content of linked third-party sites and does not make any warranty or representation regarding the content or accuracy of materials on such sites. If you decide to access linked third-party websites, you do so at your own risk. Please review the privacy policies of these websites before submitting any personal data to these sites.

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 through the

form below. 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.

We keep information as long as it is necessary or relevant for the practices described in this Policy. We also keep information as otherwise required by law.

You can control cookies and tracking tools. To learn how to manage how we use cookies and other tracking tools, and to read our cookie 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, or that we have collected about you from publicly available sources, you may contact us using the general contact form below.

Please make clear what information or posted content you would like to have changed or removed. We will 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 does not identify you that will not be removed. We will also work with our third-party suppliers with whom your information may have been shared also comply with your request.

We reserve the right to take all necessary steps permitted by applicable law to confirm your identity prior to taking any actions related to your request.

Social Media Authors: If you are a Social Media Author, you are the source of the data. You have control over that data within the platform or forums that you choose to publish it on (e.g. Twitter, and other blogs, forums, etc.), including through using the privacy settings made available to you by that platform or forum. In addition to whatever rights you have via your relationship with any publishing platform, you also have certain rights noted herein relating to your data that we process, as set out in this Privacy Policy.

California Consumers

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

- **Right to Know:** The categories of personal information we collect is listed on this page in the [Information We Collect](#) section. In addition to complying with COPPA, 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 statement signed by both you and your designated agent must be provided. The agent must also provide proof of their registration with the California Secretary of State. We reserve the right to take all necessary steps permitted by applicable law to confirm your identity prior to taking any actions related to your request. Please use 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, 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.

UK / EU users and the General Data Protection Regulation (GDPR)

For the purposes of this Privacy Policy, GDPR refers to both the UK General Data Protection Regulation (UK GDPR) and the European Union General Data Protection Regulation (EU GDPR).

Lawful Basis: Data protection law in the United Kingdom and 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 UK / 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 UK / 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 UK / 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.
- **Performance of a Contract:** In certain circumstances, we need your personal data to comply with our contractual obligation to deliver our services to you. For example, if you want to use our service, we need your name and contact details so we can communicate with you.
- **Compliance with a Legal Obligation:** We may pass on personal information when we are required by applicable law to do so, such as in cases of fraud or other criminal activity to law enforcement authorities and tax laws which require us to retain records of orders and payments.

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.

Communication: We may communicate with you by phone, in writing, via email, or other means available on or through the site and services (for example, via pop-up messaging or push notifications). We may communicate transactional or service messages to you, such as welcoming you to our services or informing you of scheduled downtime. We may also send you marketing communications, as described in this policy.

UK / EU Rights: The GDPR provides several rights to users located in the United Kingdom and 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](#)
- [Health Care Professionals](#)
- [Employees, candidates, contractors, vendors and others with a business relationship with W2O](#)

EU Supervisory Authorities: For United Kingdom users, the Information Commissioner's Office 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 – see <https://ico.org.uk/>. For EU users outside the UK, you may approach your local data protection authority – see https://edpb.europa.eu/about-edpb/board/members_en. Users in Switzerland may contact the Swiss Federal Data Protection and Information Commissioner – see <https://www.edoeb.admin.ch/edoeb/en/home.html>.

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
Attention: General Counsel

Data Protection Officer
Dan Linton – Global Data Privacy Officer

W2O Group
30 S 15th St, 11th Floor
Philadelphia, PA 19102
Phone: 267-244-1483
Email: privacy@w2ogroup.com

Cross Border Transfer and Privacy Shield

Note to users located in the EEA, United Kingdom and Switzerland: the data that we collect from you may be transferred to, processed 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, Swiss 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.

Standard Contractual Clauses (SCCs): Where required, W2O uses appropriate data processing agreements and standard contractual clauses for the transfer of data, as approved by the European Commission (Art. 46 GDPR).

Privacy Shield: W2O complies with the EU-U.S. and the Swiss-U.S. Privacy Shield Frameworks (“**Privacy Shield**”) as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union, the United Kingdom and Switzerland to the United States in reliance on Privacy Shield. W2O has certified to the Department of Commerce that it adheres to the Privacy Shield Principles with respect to such information. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

For all personal data received from the EU, Switzerland and the United Kingdom which is transferred to the United States, W2O commits to and complies with the Privacy Shield Principles, including Notice; Choice; Accountability for Onward Transfer; Security; Data Integrity and Purpose Limitation; Access, and Recourse Enforcement and Liability.

In some circumstances, W2O may also use other transfer mechanisms, including the use of standard contractual data protection clauses, or other certification mechanisms.

Recourse, Enforcement and Liability: W2O is subject to the investigatory and enforcement powers of the Federal Trade Commissions. W2O has mechanisms in place designed to assist in compliance with the Privacy Shield Principles. W2O conducts an annual self-assessment of personal data and information handling practices to verify that the attestations and assertions we make about our privacy practices are true, and that our privacy practices have been implemented as represented and in accordance with Privacy Shield Principles.

W2O offers a variety of options for individuals to resolve a dispute. You may file a complaint directly with W2O concerning our processing of your personal data using the contact form below. We will take steps to remedy issues arising out of any alleged failure to comply with the Privacy Shield Principles.

If your complaint cannot be resolved through our internal processes, W2O will cooperate with the independent alternative dispute resolution provider JAMS (Judicial Arbitration and Mediation Services – see <https://www.jamsadr.com/eu-us-privacy-shield>). JAMS mediation may be commenced as provided for in the relevant JAMS rules. Following the dispute resolution process, the mediator or you may refer the matter to the U.S. Federal Trade Commission, which has Privacy Shield investigatory and enforcement powers over us. Under certain circumstances, individuals may also be able to invoke binding arbitration to address complaints about our compliance with the Privacy Shield Principles.

W2O cooperates with relevant government data protection supervisory authorities and complies with their advice.

We may receive personal data under Privacy Shield and subsequently transfer that data to a third party acting as an agent on our behalf. In such cases, we remain liable if our agent processes such personal information in a manner inconsistent with the Privacy Shield Principles, unless we are able to prove that we are not responsible for the event giving rise to the damage.

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 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.

A printable version of this policy is available [here](#).

Subsidiaries

W2O Group (The WeissComm Group Ltd. d/b/a W2O Group - collectively “W2O” or “we” in this Privacy Policy) includes our subsidiaries – AJW Communications, LLC; Arcus Global Media, LLC; Arcus Medica, LLC; Arcus Scientific, LLC; Decibel Strategic Group, LLC (d/b/a 21Grams); Discern, LLC; Elysia TopCo, LLC; Elysia Group, LLC; habit66, LLC; IPM.ai, Inc.; ISO Health Limited; Marketeching Solutions, LLC; Octane Global, LLC; Pure Communications, LLC; Radius Medical Animation, LLC;; Sentient Interactive Limited Liability Company; Starpower, LLC; Starpower LTD;

Symplur, LLC; Swoop.com Inc.; Twist MKTG GmbH; Twist Mktg, Ltd; W Communications Inc. (d/b/a Twist Mktg, Invigorate Communications); W2O Pure Communications Limited; Weiscomm Partners, Inc. (d/b/a WCG); WeissComm Partners Singapore Private Ltd; and WeissComm Partners, Ltd.

We reserve the right to modify this Policy as needed, for example, to comply with changes in laws, regulations, or requirements introduced by applicable data protection authorities, changes to our business model, structure, products or services. We encourage you to review this Policy periodically to be informed of how we may use your personal information.

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