



pmiCME Privacy Policy

pmiCME understands how important the privacy of personal information is to our clinician-customers. pmiCME is committed to honoring your privacy, and to offering special protections for any personal health information you choose to share with us. The document you are reading is our privacy policy for our Web sites that are accessible by our continuing education program participants, and it describes what information we may collect about you, what uses we may make of it, how you can tell us what to do with your information, and what precautions we take against unauthorized access or use of your information.

Continuing Education

When you register for a Continuing Medical Education ("CME") or a Continuing Education ("CE") activity through our Web site, we collect certain personally identifiable information from you such as your name, email address and mailing address. If you are a nurse or a pharmacist and wish to receive CE credit, you are also required to provide the state in which you are licensed and your license number. In addition to personally identifiable information, we collect aggregated non-personally identifiable information about the activities undertaken by our users. We use the information that we collect through CME/CE activities in several ways:

- i. pmiCME is accredited by the Accreditation Council for Continuing Medical Education ("ACCME") to provide continuing medical education for physicians. As an ACCME accredited entity, we are required periodically to submit aggregated data about CME participants and the CME activities we certify. We also provide personally identifiable information to other accredited CME/CE providers who certify CME/CE activities posted on the pmiCME's website, as required by the ACCME and other accrediting bodies. These reports may include personally identifiable information about you and credits issued to you, for the purpose of maintaining records that you can request from the accredited provider for up to six (6) years;

- ii. Commercial supporters of CME/CE activities on our website will receive only aggregated data about CME/CE activities that are relevant to their interests and/or the courses they support;

- iii. pmiCME staff will have internal access to files containing personally identifiable information, including evaluation forms and aggregated CME/CE participant information. These files can be accessed in order to respond to your questions or comments. Our staff may also use personally identifiable information, including registration information and evaluation data, in assessing educational needs and planning marketing activities; and

We may use the information we collect as otherwise permitted in this Privacy Policy.

Use of Cookies

Cookies are a technology used by the pmiCME websites to identify a user as the user moves through the website. Your browser allows us to place some information on your computer's hard drive that identifies

the computer you are using. We use cookies to personalize our websites and to track your usage across all of websites on which pmiCME -certified educational activities appear.

Your Web browser can be set to allow you to control whether you will accept cookies, reject cookies, or to notify you each time a cookie is sent to you. If your browser is set to reject cookies, websites that are cookie-enabled will not recognize you when you return to the website, and some website functionality may be lost. The “Help” section of your browser will tell you how to prevent your browser from accepting cookies.

Uses We Make of Information

In this section of our privacy policy, we identify the ways we may use information about you that we have collected.

Aggregate Data

We create aggregate data about visitors to websites that contain pmiCME -credited CE activities for product development and improvement activities. We also use it for market analysis. We may provide information from these websites in aggregate form, with identifying information removed, to third parties. For example, we may tell a healthcare partner that percentages of our registered users reside in a particular geographical area. When aggregated health information is provided, we pool it from many individual records and strip it of any data that could be used to identify an individual before it is used. Any third party that receives aggregated healthcare data must agree not to attempt to re-identify the people to whom these data belong.

Third Parties

In addition to aggregate information (discussed previously), we may share some kinds of information with third parties as described below:

- **Other Companies:** We have strategic relationships with other companies who support online CE. When you are interacting with those companies, different rules and privacy policies may apply.
- **Companies and People Who Work for Us:** Because we are an education company, we contract with other companies and individuals to help us provide services. For example, we may host some of our websites on another company's computers, hire technical consultants to maintain our web-based health tools, or work with companies to remove repetitive information from customer lists, analyze data, provide marketing assistance, and provide customer service. In order to perform their jobs, these other companies may have limited access to some of the personal information we maintain about our users. We require all such companies to comply with the terms of our privacy policies, to limit their access to any personal information to the minimum necessary to perform their obligations, and not to use the information they may access for purposes other than fulfilling their responsibilities to us. We use our best efforts to limit the use of other companies in areas where personally identifiable healthcare information may be involved.
- **Legal Requirements:** We may release account and other personal information when we believe release is required to comply with law. When we share information with third parties, we ask that they agree in writing to abide by the PMI privacy policies.

If we discover that a third party inadvertently disclosed personal information about any of our customers, we will take immediate action to prevent further occurrences.

Protection of Information

In this section of our privacy policy, we discuss the security measures we take to protect information that we have collected about you.

General Policies

We have implemented technology and security policies, rules and other measures to protect the personal data that we have under our control from unauthorized access, improper use, alteration, unlawful or accidental destruction, and accidental loss. We also protect your information by requiring that all our employees and others who have access to or are associated with the processing of your data respect your confidentiality.

Storage of Health Information

Personally identifiable health information you share with us is stored on our database servers at pmiCME data centers or hosted by third parties who have entered into agreements with us that require them to observe our Privacy Policy. We have a firewall to prevent individuals from accessing information without authorization. Data centers are physically secure and protected from unauthorized access by unauthorized persons. Physical access to the servers requires individual authorization and authentication.

Information in our data centers is backed up routinely, in order to aid in the recovery of information in the event of accidental damage of information or due to a natural disaster. The backup media is stored in a physically secure storage facility.

Access to Information and Choices

In this section of our privacy policy, we tell you how to obtain and correct information we have about you, and how to choose what types of information you may share with us.

pmiCME Employees

pmiCME employees are required to keep customer information private, as a condition of their employment with this provider. Only selected, authorized employees are permitted to access your information.

Privacy Questions or Concerns about One of Our Websites

For privacy questions or concerns about the pmiCME website or any website that hosts or supports a pmiCME accredited CE activity, please contact Sr. Manager, Accreditation, Pri-Med Institute, by phone at 617 406 4600.