

Privacy Statement

Website Privacy Policy
Last Updated: May 26, 2018

This Privacy Policy (the "**Policy**") describes the practices of Creative Educational Concepts, Inc. (CEC) with respect to the collection, use, retention and disclosure of information regarding visitors to our website located at www.ceconcepts.com (the "Site"). We want to be sure you understand our practices and how we strive to protect any personal information collected by the Site.

By using the Site, you agree to the terms of this Policy, to which you must agree in order to use the Site. If you do not agree to the terms of this Policy, please do not use the Site.

We may update this Policy at any time. Any changes to the Policy will become effective upon the date of our posting of the revised Policy on the Site. If you use the Site following that date, you will be deemed to have accepted the Policy's updated terms.

1. What Types of Information Do We Collect From Site Visitors?

The information we collect through the Site includes "Personally Identifiable Information" ("PII"), which is information that identifies an individual personally, such as first and last name, date of birth, postal address, email address, and telephone number. It could also include a visitor's photograph, account information from social media platforms, as well as demographic information such as gender and nationality. We will collect this type of information from you when you voluntarily provide it through the Site, such as if you choose to register on the Site or if you post it in comments on the Site or send it to us by e-mail.

For example, when you participate in a continuing medical education ("CME") activity provided by CECI, we ask you for your name, street address, telephone number(s), fax number, e-mail address, profession and specialty. We may also ask for your NPI number if you are participating in CME/CE activity related to a federally mandated Risk Evaluation and Mitigation Strategy ("REMS") for which participant tracking is required by the U.S. Food and Drug Administration ("FDA"). We may also ask you for your credit card information if a particular CME/CE activity requires payment.

If you post PII on or through the Site (e.g., via chat rooms, bulletin boards, post cards or invitations), that PII is generally accessible to and may be collected and used by others and may result in unsolicited messages or other contact from others. You are therefore advised to exercise caution when PII in such areas of the Site. You are solely responsible for the information and other content you post on or through the Site. See Terms and Conditions of Use.

The Site also automatically collects information about you as a Site visitor that is not PII but relates to your use of the Site. Non-PII is aggregated information, demographic information and any other information that does not reveal your specific identity. Non-PII is "passively" collected from you through browser navigational tools, such as cookies and pixel tags. These types of technologies enable the Site to compile statistics about our daily number of site visitors or specific page requests, while not identifying you personally, other than by your IP address, which is the Internet Protocol address of the computer that you use to access the Site. **We do not permit unaffiliated third parties to track information on users of our Site.**

A cookie is a small data file that a Web site transfers to a user's hard drive when a user visits the Web site. A cookie file can contain information such as a unique ID that the site uses to track the pages visited, and is a standard method of registering website user preferences. These preferences are stored in a file on your computer's hard disk drive. We also use 'analytical' cookies. These allow us to recognize and count the number of visitors to the Site and to see how visitors move around the Site when they're using it. This helps us improve the way our website works, for example by making sure users find what they need easily.

Our Site uses both persistent and session cookies. Persistent cookies are cookies that stay on your computer permanently until you "manually" delete them. Session cookies delete themselves automatically when you leave a website and go to another one or shut down your browser.

Advertisers may include their cookies, web beacons, or other tracking technologies within their advertisements on the Site. Additionally, third party vendors, including Google, use cookies to serve third party ads based on your prior visit to the Site.

By using the Site, you are deemed to unambiguously agree to its use of any cookies that you do not disable.

2. How Do We Use the Information the Site Collects?

- ▶ **PII.** We may use the PII collected through the Site for any or all of the following purposes:
 - **i. Responses to Requests.** We may use PII about you to respond to your requests, such as to answer your questions about CME programs, and to provide you with the benefits offered by programs in which you enroll.
 - **ii. Grading Your Tests.** We use your personal information to grade your post-test and/or to issue you a certificate of completion documenting your participation in the CME/CE activity.
 - **iii. Educational Outcomes.** We will use your information to send and manage educational outcomes measurement surveys.
 - **iv. Communications with Our Subscribers.** If you join our mailing list (by agreeing to be contacted with special offers and informed of special events, etc.), we will send you information on such offers, events and other products, programs, or services that we believe may be of interest to you. You may opt out of receiving such communications, as described in those communications and in Section 4 below on managing your PII.

- **v. Internal Business Purposes.** We use PII about you for our internal business purposes, including in particular to help us determine usage of CME programs, events, and other offerings, and to track the acceptance of program offers and help us improve our offerings. We also use PII for related internal purposes, such as data analysis, audits, enhancing the Site, identifying usage trends and determining the effectiveness of our promotional messaging.
- ▶ **b. Other Information.** We use non-PII to help us improve the Site, such as by analyzing usage of certain pages or functions on the Site. We may also use non-PII for other purposes, but if any such use involved combining the non-PII with any data so that it became identifiable to you or another person, we would then treat it as PII in accordance with this Policy.

3. With Whom Do We Share Information Collected Through the Site?

We may share PII we collect through the Site with certain third parties in certain circumstances, including:

- ▶ **i. Affiliates.** We may share PII with our affiliated companies in the CECI group of companies.
- ▶ **ii. Third Party Service Providers.** We may share PII with unaffiliated third parties who provide us with services, such as the designer of the Site, to provide technology, data analysis, or similar services. As another example, if we use a third-party company to grade your post-test and/or issue certificates of completion, we will give your name, street address, e-mail address, profession and specialty to that company for that purpose.
- ▶ **iii. Accrediting Organizations.** We may report your participation and share your personal information, including name, address, and NPI number with organizations, such as the Accreditation Council for CME (“ACCME”), that are approved by the FDA to collect information on CME/CE related to a mandated REMS.
- ▶ **iv. Educational Partners/Providers.** On occasion, a third-party educational provider or partner of a CME/CE activity on the Site (a “Provider/Partner”) will ask us for a list of the people who participated in a particular CME/CE activity that the Provider/Partner prepared or accredited, for the Provider/Partner’s record-keeping purposes only. In response to such a request, we will provide the Provider/Partner with the name, street address, e-mail address, profession and specialty of each person who participated in that CME/CE activity.
- ▶ **v. Supporters.** We may disclose your personal information to the commercial supporter of a CME/CE activity (the “Supporter”) so that it can comply with applicable laws or document the first level of outcomes-based evaluation in that CME/CE activity. For example, if the Supporter asks us for is asking for personal information that it needs to comply with the federal “Sunshine Act,” and you participated in the relevant CME/CE activity, we will provide your first, middle and last name and your street address, and the fact that you participated in this particular CME/CE activity.
- ▶ **vi. Third Parties for Marketing.** We do not share PII with unaffiliated third parties for their own marketing purposes. We also may share your personal information with third parties, so that they may send you information about CME/CE activities that they offer. If you are a California resident, you may request the names of any these or any other third parties with whom we share your personal information for their own promotional uses by sending a request to us at info@ceconcepts.com
- ▶ **vii. Acquirers or Assignees.** In the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of CECI or its assets, we may transfer any and all information that we collect from Site users to the acquiring party or assignee.
- ▶ **viii. Entities Entitled Under Law.** We may disclose PII about you to others as we believe to be appropriate in the following circumstances: (i) when required by applicable law, including laws outside your country of residence; (ii) to comply with legal process (iii) to respond to requests from public and government authorities; (iv) to enforce the terms and conditions for use of the Site, including this Privacy Policy; (v) to protect and defend our rights and property; (vi) to protect the interests and safety of CECI or others; and (vii) to permit us to pursue available remedies or limit the damages that we may sustain. We have no obligation to notify you of such disclosures, except as required by applicable law.

4. How Can You Manage PII We Maintain?

- ▶ **a. Managing Communications with You.** If you no longer wish to receive emails from us on a going-forward basis, you may opt-out of receiving such emails by following the “unsubscribe” directions on the e-mails, or by calling us toll-free at 1-866-360-1717 (8:30 am-5:30 pm (EST), Monday-Friday), or by sending an e-mail to info@ceconcepts.com with the subject line “Unsubscribe.” We will endeavor to comply with your request as soon as reasonably practicable.
- ▶ **b. Updating or Correcting PII.** If you would like to review, correct, update or remove PII about you that you previously provided to us (other than your birth date), you may do so by visiting your “member settings” page. If you are unable to locate that page, please inform us by sending us an e-mail at info@ceconcepts.com. For your protection, we will only implement such requests with respect to the PII associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request.
- ▶ We will endeavor to comply with your request as soon as reasonably practicable. Please note that we are not responsible for correcting, updating or deleting any information in the databases of third parties with whom we have already shared your PII.

5. How Do We Protect and Maintain PII Collected Through the Site?

- ▶ **a. Security.** We use reasonable organizational, technical and administrative measures to help protect against the loss, misuse and alteration of the information under our control. However, no data transmission over the Internet or data storage system can be guaranteed to be 100 percent secure. Please exercise caution in sending us any information you consider confidential. It is your personal responsibility to secure your own copies of your passwords and related access codes for our online resources.
- ▶ **b. Data Integrity and Retention.** We will retain PII about you for the period necessary to fulfill the purposes outlined in this Policy or our data retention policies unless a longer retention period is required by law.
- ▶ **c. Third-Party Sites.** The Site may contain links to third-party websites, such as the websites of the third parties that promote our programs or products. These linked sites are not under CECI’s control and we are not responsible for the privacy practices or the contents of any such linked site, or any link contained in any linked site. If you provide any PII through any such third party website, your transaction will occur on such third party’s website (not this Site) and the PII you provide will be collected by, and controlled by


the privacy policy of, that third party. We recommend that you familiarize yourself with the privacy policies and practices of any such third parties, which are not governed by this Privacy Policy.

6. **Users Outside the United States.** By using our site, you authorize us to transfer and store your information outside your home country, including in the United States, for the purposes described in this policy. The privacy protections and the rights of authorities to access your personal information in such countries may not be equivalent to those of your home country.
7. **Collection of PII by Others Through Our Site.** We do not allow others to collect the PII of visitors to our Site by tracking the usage of either our Site or other websites.
8. **Use of the Site by Minors.** This Site may not be used by minors and we do not knowingly collect PII from any individuals under age 18. If you are under age 18, please do not submit any PII to us and if you have done so, including by erroneously registering on the Site, please inform us of that immediately by sending us an e-mail at info@ceconcepts.com.
9. **International Transfers and Processing of PII.** By providing your PII to the Site, you fully understand and unambiguously consent to the transfer of such PII to, and the collection, retention and processing of such PII in the United States and other countries or territories.
10. **We may update this privacy policy from time to time, and you should take the time to review it each time that you visit our web sites. We are committed to protecting your personal privacy. If you have questions or comments about our efforts to protect your personal privacy, or if you require additional information about our privacy commitment, please contact us at info@ceconcepts.com.**

Name*

E-mail*

Type of Feedback*

Title of CE Activity (if applicable)

Comments*

Related links

- ▶ [FAQ](#)
- ▶ [Privacy Statement](#)

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