



# PRIVACY POLICY

Wills Eye Hospital is committed to protecting your personal information. We collect information when you register to better provide you with personalized educational resources. The Privacy Policy below outlines the information we may collect when you register and subscribe and how this information will be stored safely and confidentially. The Privacy Policy applies only to information collected from you online, not offline.

If Wills Eye Hospital changes any of its privacy policies, the changes will be posted at this page. Wills Eye Hospital reserves the right, at our discretion, to change portions of this Privacy Policy at any time. Please make sure to check this page periodically for any changes. If you do not agree with the terms of this Privacy Policy, please do not visit this site.

## **Registration Information**

Visitors to the Wills Eye Cloud CME Portal are able to spend time reviewing the web site for a few minutes before being prompted to register. Registered users will be asked for personal information and this information will help us provide customized alerts and featured educational offerings aimed at your specialty, if this is requested. By using this site, you agree to provide true, accurate, current and complete information about yourself as requested during registration. You also agree to update this information if needed.

Once registration is completed, you will receive a password via email. You agree to maintain the confidentiality of your password which will be also be used to track your CME certificates if



requested. You agree to contact the Wills Eye Cloud CME Portal administrator immediately if you determine that there has been any unauthorized use of your account or password or any other breach of security. Wills Eye Hospital is not liable for any loss or damage arising from your failure to comply with these requirements.

### **Subscription Information**

For those visitors who opt to subscribe to the Wills Eye Cloud CME Portal, additional information will be collected, such as credit card number, security code, and home address, in order for our financial partner to confirm credit card payment.

### **Protection of Information**

We have initiated technology that will ensure the protection of your personal information collected during the registration, subscription, and CME processes. Passwords and usernames are used to authenticate returning users. It is most important that you take the appropriate measures to protect the security of your account login and password. Wills Eye Hospital may disclose user information if required by law, or if we believe that disclosure is necessary to comply with the law or with legal process to protect and defend the rights or property of the Wills Eye Cloud CME Portal or to act in an emergency to protect someone's safety.

Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. Accordingly, while we strive to protect your personal information, Wills Eye Hospital cannot guarantee the security of any information you transmit to us, or to



or from our online products or services. You transmit all such information AT YOUR OWN RISK. However, once we receive your transmission, we will use commercially reasonable efforts to ensure its security on our servers.

## **Cookies**

The Wills Eye Cloud CME Portal uses cookies in order to provide our users with personalized information. This web site will set up a cookie at the time of registration which will allow you to retrieve saved information and to access personalized information, such as, but not limited to your CME certificates. If for any reason you wish not to take advantage of cookies, you may set your browser not to accept them, although this may disable or render unusable some features of this site.

## **IP Addresses**

The Wills Eye Knowledge Portal will collect IP addresses for the purpose of monitoring and evaluating aggregate data regarding the use of our site. IP addresses will not be linked to personalized identifiable data.

## **E-mail Newsletters**

The Wills Eye Cloud CME Portal may offer free electronic newsletters to users upon registration now or in the future. Upon registration, users can opt in or out for this service. Unsubscribing to the email newsletter will be possible at any time at the bottom of the email.



## **Continuing Medical Education**

We are accredited by the Accreditation Council for Continuing Medical Education (ACCME) to provide continuing medical education for physicians. The ACCME requires that we submit aggregated data about CME participants and the CME activities they have completed. When registering for a CME activity, you will be requested to enter your name, email address and mailing address. In order to receive a CME certificate, you will be asked to complete a post-test questionnaire and an evaluation. We are required by ACCME to maintain your personal records and certificate, which you may request, for up to six years.

## **Use on Registration and Subscription Information**

In order to review the users of the Wills Eye Cloud CME Portal and continually improve the site, we will be evaluating data about visitors. This data will be aggregated, without identifying information.

## **Children's Privacy**

The Wills Eye Hospital is committed to protecting the privacy of children. This Wills Eye Cloud CME Portal is not designed or intended for children or teenagers under the age of 18.



## California Privacy Rights

A California resident who has provided personal information to a business with whom he/she has established a business relationship for personal, family, or household purposes ("California customer") is entitled to request information about whether the business has

disclosed personal information to any third parties for the third parties' direct marketing purposes. In general, if the business has made such a disclosure of personal information, upon receipt of a request by a California customer, the business is required to provide a list of all third parties to whom personal information was disclosed in the preceding calendar year, as well as a list of the categories of personal information that were disclosed.

However, under the law, a business is not required to provide the above-described lists if the business adopts and discloses to the public (in its privacy policy) a policy of not disclosing customer's personal information to third parties for their direct marketing purposes unless the customer first affirmatively agrees to the disclosure, as long as the business maintains and discloses this policy. Rather, the business may comply with the law by notifying the customer of his or her right to prevent disclosure of personal information and providing a cost free means to exercise that right.

Wills Eye Hospital does not share information with third parties for their direct marketing purposes unless you affirmatively agree to such disclosure. If you do ask us to share your information with a third party for its marketing purposes, we will only share information in connection with that specific promotion, as we do not share information with any third party on a continual basis. To



prevent disclosure of your personal information for use in direct marketing by a third party, do not opt in to such use when you provide personally identifiable information on one of our sites. Please note that whenever you opt in to receive future communications from a third party, your information will be subject to the third party's privacy policy. If you later decide that you do not want that third party to use your information, you will need to contact the third party directly, as we have no control over how

third parties use information. You should always review the privacy policy of any party that collects your information to determine how that entity will handle your information.

California customers may request further information about our compliance with this law by e-mailing Scott Gorman. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this e-mail address.

### **Privacy Questions or Concerns**

Privacy questions or concerns can be directed to the Wills Eye Cloud CME Portal Administrator:

Scott Gorman  
sgorman@willseye.org  
215-440-3168

