

Privacy Policy Standards and Practices

IC Axon, powered by ClinicalMind (“**IC Axon**”, “we”, “us” or “our”) is committed to protecting your privacy data and providing a secure online environment to support your learning and development. We provide consulting and blended-learning solutions containing web-based applications, online assessments and surveys created and hosted by **IC Axon** on behalf of our Customers (“Customer Sites”).

The data privacy standards and administrative practices described here emanate from our corporate-level ClinicalMind Privacy Policy (see link provided). This document explains our privacy standards and practices and expresses our commitment to keeping you informed of the information we collect and how it is used. These standards and practices apply to all Personal Privacy Information (PII) we collect in connection with Customer Sites and our corporate website, including research and marketing surveys.

When you visit the **IC Axon** web site, we collect and store information about your visit. We may also engage other companies to do this on our behalf. Examples of the kind of information we, or third parties we engage, track include which pages you view on our site, the site you visited just before coming to ours, keywords you used in your search, your company name and the name of your Internet service provider. We use this information to develop ideas for improving our site, our products and services and for better marketing of our products and services. We do not make any attempts to link this information with you as an individual.

There are also various forms on our web site that ask for personal information about you, such as your name, phone number, and e-mail address. If you tell us any personal information, we use it only to contact you in response to your request or to provide you with information that we think you may be interested in receiving. If you inform us that you do not want to receive any information that you have not specifically requested, we will honor your request. We will not sell or otherwise disclose your information to any other company.

At **IC Axon** our Data Privacy and Records Management Policy is a commitment to protecting the privacy of employee, client, and web and social media site visitor personal data. We make every reasonable effort to protect the privacy of data collected when individuals visit our sites.

ClinicalMind employs professional security personnel and takes technical and organizational measures designed to prevent unauthorized access, use, alteration, or disclosure of privacy data collected via our sites. We try to be both selective and proactive in checking the security background for certain external social media sites and other sites that we come in contact with but do not control. ClinicalMind has extensive experience in operating highly secured data repositories with security controls that are continuously updated to meet industry standards and address protective measures for emerging threats. Security practices are described in detail in our internal information technology (IT) policies and procedures.

Information We Collect

Customer Sites

IC Axon collects basic contact information, which may include but is not limited to the following: name, email, user-created password, feedback-provider name and feedback provider email address.

This information is used to register program Participants and is treated as confidential customer information; it is collected on behalf of and in accordance with their instructions. **IC Axon** may use this information to contact the Participant, send notifications or reminders in order to facilitate the training process, and conduct research.

Participant information is collected on behalf of and shared with the Customer. **IC Axon** does not use Participant information for marketing purposes, and we do not disclose Participant information to any third parties unless expressly directed by the Customer or a court of law.

Registration and Profile Information

Using the principle of Data Minimization, we try to gather only the most necessary information for the involved inquiry or purpose. When you enter or register to use our site or our services, to receive information, to participate in our events, and to create or update your forum profiles, we may collect various kinds of information about you. For example, we may collect: your name; postal address; phone number; fax numbers and email address; your log-in ID and password; your title; company; and other event-specific profile information you provide; demographic information; and information linked with your profile, such as comments you may post. We need this information to be able to respond to you, secure the site, and provide services as applicable.

When you visit our site or use **IC Axon** site services, as do many companies, some information is collected and recorded automatically such as your computer's operating system, Internet Protocol (IP) address, access times, browser type and language, and the website you visited before our corporate sites, so we are aware of transfers and linking for security due diligence (blocking and enhancing) of our site and to protect you the user. This is logged automatically and stored in log files.

We also collect information about your usage and activity on our corporate sites. We may tie your IP address to information we automatically collect on our corporate sites. We may also tie information we automatically collect with personal information, such as your login ID and information you give us for a registration. We use our own products, and products of third parties acting on our behalf, to analyze, optimize, securely protect and improve our site.

We will also collect information on your usage to ensure the security of the data we collect on behalf of our clients. You cannot opt-out of this collection and processing as it is necessary to ensure the security of the service we provide for our sites and for our clients.

We use cookies to collect information allowing for analytics, user experience and session tracking, as well as video use tracking. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

IC Axon may also use device-recognition technologies combined with other identifiers to create cross-browsers and cross-devices identities to provide you with better services and security.

As a ClinicalMind site visitor does the “GDPR”, CCPA, Privacy Shield and other similar data privacy and records management requirements apply to my data?

Companies within the EU, or who are externally located controllers and processors of the personal privacy data of EU residents in the context of collecting privacy data while soliciting and providing goods or services, will need to comply with the GDPR. **IC Axon** and ClinicalMind (CME) have adopted the GDPR and Privacy Shield as our worldwide standards for data privacy. As a site visitor we do collect your business contact information. However, we may also collect or process privacy data for the purpose of providing additional services. We are very aware that combining multiple data elements, even if not considered personal data when taken alone, may result in them being considered personal privacy data when combined into a listing.

We may move your data within or to locations outside of the European Economic Area (EAA). These data transfers are legal under the GDPR, CCPA, and Privacy Shield as long as we adhere to the requirements for legal processing. We encrypt all data in transit and in storage.

We have evaluated our obligations under the GDPR, CCPA, and Privacy Shield, in part, based on: (1) the type of visitor data that we collect via our sites, and (2) the legal basis on which you rely for the protection of your data. We will exercise data privacy stewardship on all of our sites.

ClinicalMind complies with the U.S.-EU Privacy Shield Framework as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information from European Union member countries and Switzerland.

How will my personal information be used and shared by IC Axon for internal management of their sites?

The personal information we collect in our various sites allows us to:

- respond to your inquiries;
- provide the information, products and services you have ordered;
- verify your identity and details of your payment method or credit card amount;
- administer our sites and provide user services;
- meet legal, regulatory and compliance requirements;
- monitor and analyze the use of any account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime;
- gather management information to form statistical and trend analysis;
- communicate with you;
- investigate any complaints about our sites;
- personalize your experience of the sites;
- contact you about our products and services which we think might be of interest to you (where we have the appropriate permissions to do so);
- when warranted, we share your personal information with our ClinicalMind affiliate companies and their brands for the above purposes;
- employ the services of third party service providers to help us in certain areas, such as site hosting, maintenance and call center operation. In some cases the third party may

receive your information. However, at all times we use third parties, we will control and be responsible for the use of your information and place contractual requirements on privacy data sent to our sub-processors.

- If you provide a credit or debit card, we may also use third parties to check the validity of the sort code, account number and card number you submit in order to prevent fraud as well as to process any transaction you attempt via the website.
- If false or inaccurate information is provided and fraud is identified, we will follow legal processes if details will be passed to fraud prevention agencies. Law enforcement agencies may access and use this information. We and other organizations may also access and use this information to prevent fraud and money laundering, for example when:
 - checking details in applications for credit and credit related or other facilities
 - managing credit and credit related accounts or facilities
 - recovering debt
 - checking details on proposals and claims for all types of insurance
 - checking details of job applicants and employees.

Is IC Axon organized to manage the data processor obligations imposed by the GDPR, CCPA, Privacy Shield and other similar laws and regulations?

ClinicalMind, as the parent company of **IC Axon**, established a Data Protection and Records Management Committee and appointed Data Protection Officers (DPOs) to manage the program and comply with the GDPR. The Committee is tasked with instituting internal data privacy compliance initiatives.

For **IC Axon**, keeping site visitor data secure is a high priority. Along with ensuring data security, it is important that a site visitor's confidence is always maintained and a high level of security around processes and protection is strongly administered.

We strongly value and base our business on the trust that our site visitors, employees and customers have placed upon us. We will continue to earn and reinforce that trusted relationship by cooperating with requests related to our GDPR, CCPA, Privacy Shield and other country data privacy obligations.

We are committed to taking advanced measures to support and continuously enhance the security of our systems, to ensure that we collect and process personal data in a manner compliant with GDPR, CCPA, Privacy Shield or any similar legislation.

Our management strongly believes that information technology security/compliance is a key business service. Information security objectives and strategy must be continually aligned with business strategy and objectives.

Viewing and Correcting Personal Information

We provide you with the means to update or change your Personal Information. Customer Sites have a user profile form to edit Personal Information. Requests to change Personal Information collected on our corporate website, including related surveys, can be directed to privacy@clinicalmind.com.

When does IC Axon delete client data?

IC Axon deletes client data, including backups based on our records management schedule. In some cases that can be shortly after you leave one of our sites. Web and social media privacy information is deleted after you finish browsing or have opted out of receiving our communications or you have been unresponsive to our inquiry messages for a period of time. If you acknowledge our site use rules to continue browsing or you agree when specifically requested to opt-in, your information is transferred to our secure customer relations management data base. In some cases we are legally and/contractually required to keep some data for more extended periods of time consistent with the lawful processing provisions of the GDPR. Data is held in various categories in our records management deletion schedules. These data retention categories range from nearly immediate up to seven (7) years unless there is a longer legal requirement. For more information about data retention times please [contact us](#).

What constitutes personal privacy data?

Any personal information related to a natural person (called a 'data subject' by the GDPR) that can be used to directly or indirectly identify the person when not encrypted and used individually or in combinations to create a profile.

Personal privacy data is a very broad range of personal information and can be any information item that might be used to create a profile beyond what **IC Axon** considers basic business contact information of name, business address, business phone and business title or business job. Personal privacy information would be: an identifiable photo; identifiable voice recordings; fingerprints; biometric data; a personal email address, home phone number, home address; numbered identifiers – bank account, credit information and credit card, passport, country identification and driver's license numbers and social security; family member information; medical information; political opinions; sex, sexual preferences; computer IP address; data on children; travel profiles; trade union membership; criminal records. Some countries consider some of these listed items as Sensitive Personal Identification Information (SPII).

Anonymous aggregate survey responses are used for **IC Axon's** ongoing research and analysis as allowed under the GDPR; individual Customer or Participant information is never identified.

What is the difference between a data processor and a data controller?

- A controller is the entity that determines the purposes, conditions and means of the accessing of personal data. A controller can be a processor. A site owner is a controller.
- A data processor is an entity which processes personal data on behalf of the controller.
- **IC Axon** is a controller and/or a processor at varying times in our conduct of business.

Is IC Axon a data processor or data controller in regard to my personal data?

IC Axon acts as a data controller and in some cases is also a processor (or sub-processor) for personal data provided to us through our customers, by individuals and other third parties such as partners.

If you as a data subject provide your personal data directly to **IC Axon** (such as a site visitor, a forum or conference attendee, a site browser, etc.) we act as the data controller for that personal data. Note, if we also process that personal data in some fashion, we qualify as a data processor in regard to that personal data.

How do you use Web Beacons?

Some of our web pages may contain electronic images known as web beacons (sometimes known as clear gifs) that allow us to count users who have visited these pages. Web beacons collect only limited information which includes a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. We may also carry web beacons placed by third party advertisers. These beacons do not carry any personally identifiable information and are only used to track the effectiveness of a particular campaign.

How do you use Social Media Widgets?

IC Axon sites can include certain social media features, such as the Facebook button. These features may collect your IP address, may collect which page you are visiting on our sites, and may set a cookie to enable such features to function properly. Social media features are either hosted by a third party or hosted directly on our sites. Your interactions with these features are governed by the privacy policy of the company providing it.

How do you use Blog Information?

Should you choose to add a comment to any posts that we have published on our sites for example in a blog, the name and email address you enter with your comment will be saved to the site's database, along with your computer's IP address and the time and date that you submitted the comment. This information is only used to identify you as a contributor to the comment section of the respective blog post and is not passed on to any of the third party data processors. Only your name will be shown on a site that is public-facing. Your posted comment(s) and its associated personal data will remain on this site until we see fit to either 1) remove the comment, or 2) remove the blog post. Should you wish to have the comment and its associated personal data deleted, please email us with your request and list your contact information and the email address that you commented with.

If you are under 18 years of age we request you obtain parental consent before posting a comment on our blog and sites.

NOTE: You should avoid entering personally identifiable information to the actual comment field of any blog post comments that you submit on this site.

How does IC Axon use Contact Forms and Email Links?

Should you choose to contact us using a contact form on our sites or an email link, the data you supply will be stored in our customer relationship management database or may be passed on to be processed by a contracted third party data processor(s). We do retain information from data requests in our customer relationship management system. Collated and transferred data is encrypted before being sent across the internet. We do not sell nor allow our processors to sell personal information ClinicalMind may obtain in conducting business.

Cookies

Use of Cookies – Practices and Procedures

ClinicalMind uses cookies for a variety of purposes such as remembering your preferences, measuring your activity on ClinicalMind's websites, mobile sites and mobile applications ("sites") or optimizing your user experience. Disabling cookies on your internet browser will stop tracking of any part of your visit to pages within the site. All traffic (transferal of files) between the site and your browser is encrypted and delivered over HTTPS.

Cookie Settings

The types of cookies ClinicalMind and others may place on your device are described below.

- CME will read or set only the types of cookies that are strictly necessary for quality browsing or specifically allowed by your browser preference settings.
- CME only places cookies that set your preferred language, deliver specific content based on visit history, and give access to various sections of the sites.
- Cookies set by our sites will remain on your device but CME will not access or use those non-strictly-necessary cookies. You may remove them using functionality provided by your browser. Please note that cookies are specific to the browser or device you use, as well as to the domain, and you will therefore have to configure your preferences again if you change your browser or device, or visit a different domain.
- Any specific questions regarding these cookie settings may be sent to privacy@clinicalmind.com.

Children's Privacy

Our websites do not publish content or collect data that is directed at children.

EU-U.S. Privacy Shield Framework

ClinicalMind complies with the EU-U.S. Privacy Shield Framework, as set forth by the U.S. Department of Commerce, regarding the collection, use, and retention of privacy category information transferred from the European Union (EU) and the United Kingdom (UK) to the United States involving CME employee, client-related and vendor data. ClinicalMind (CME) has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms of the CME data 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/>

ClinicalMind has further committed to cooperate with the panel established by the EU data protection authorities (DPAs) with regard to unresolved Privacy Shield complaints. Such complaints involving CME human resources, web and social media and client-related privacy data transferred to the U.S. will be reviewed in the context of the employment relationship and/or a business services relationship.

In the conduct of our business:

- We encrypt our data in transit and in storage.
- In our delivery of training activities and consulting services we are sometimes contractually required to conduct business operations processing wherein we collect client employee, vendor and client customer privacy data on behalf of our clients and for our internal services processes. We also may collect limited categories of privacy data from individuals that visit our web and social media sites. This information is stored in secure sites.
- We use or intermittently use contracted assistance to process CME payroll, human resources and related employee services and in doing so we necessarily disclose personal information to accomplish these processing operations.
- We acknowledge that individuals have the right to inquire about and access their data.
- ClinicalMind is required to disclose personal information in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.
- We make efforts to limit the collection, use and disclosure of personal data to help protect personal privacy. We will discuss with you your specific request to limit use of your data if you choose to restrict the use of privacy data. We most likely cannot make exceptions for required legal, regulatory, contractual and personal public safety contact information erasure requests. The discussions will include the alternate processes and consequences of the alternative processing methods available to accomplish the same necessary services affected by your request, up to and including deleting data if that is an option.
- ClinicalMind is subject to the investigatory and enforcement powers of the Federal Trade Commission (FTC).
- An individual has the possibility, under certain conditions, for the individual to invoke binding arbitration when seeking more restrictive data privacy remedies from ClinicalMind.
- ClinicalMind understands that it may not be absolved of liability in cases of onward transfers of privacy data to third parties.

Acceptance of Privacy Policy Terms

We reserve the right to modify this Policy at any time without prior notice. Any such change, update, or modification will be effective immediately upon posting on this Site. Your continued use of the Site subsequent to changes to this Policy will mean that you accept the changes; therefore, you should bookmark this page and review it frequently.

Dispute Resolution

Any questions or concerns regarding the use or disclosure of Personal Information should be directed to **IC Axon** at the address below. We will investigate and attempt to resolve complaints and disputes regarding use or disclosure of Personal Information in accordance with the

principles contained in this policy. **IC Axon** has also agreed to participate in the dispute-resolution procedures of the European Data Protection Authorities to resolve disputes pursuant to the GDPR, CCPA, or Privacy Shield principles.

Legal Disclaimer

Though we make every effort to preserve user privacy, we may need to disclose Personal Information when required by law wherein we have a good-faith belief that such action is necessary to comply with a current judicial proceeding or public safety.

Additional Information

In compliance with the Privacy Shield Principles, CCPA, and the GDPR, ClinicalMind commits to respond to inquiries about our collection or use of your personal information. EU, UK and individuals worldwide with inquiries regarding our privacy policy should contact us at:

ClinicalMind LLC

40 Fulton Street, 9th Floor

NY, NY

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Attention: Zeynel Zerek – Chief Technology Officer / Corporate Security