

Please read these notices and disclaimers carefully before sending information to Dermatologists of Central States and its affiliates (“DOCS”, “we”, “us”, or “our”) docsdermgrou.com or our affiliate websites.

Effective Date: **June 11, 2020**

Privacy Statement

Dermatologists of Central States and its affiliates are committed to respecting and protecting your privacy. DOCS and its affiliates have developed this Privacy Statement (this “Privacy Statement”) to describe how we may collect information about you through your interactions with us, on our website docsdermgrou.com or our affiliate websites (the “Site”) or through your online interactions with us (collectively, the “Services”), how we use collected information, and how and under what circumstances we share that collected information with third parties.

When you submit information to us through the Site, such as through the “Contact Us” page, or any other page or accessed through the Site, you consent to the collection and processing of your information as described in this Privacy Statement. **IF YOU DO NOT AGREE WITH ANY PART OF THIS PRIVACY STATEMENT, PLEASE DO NOT USE THE SITE AND DO NOT SUBMIT ANY INFORMATION TO US.**

We may change this Privacy Statement from time-to-time without notice. The “Effective Date” legend at the top of this page indicates when this Privacy Statement was last revised. Any changes will become effective when we post the revised Privacy Statement on the Site. For this reason, you should review this Privacy Statement when you visit the Site and note the Effective Date. Your continued use of the Site after the Effective Date constitutes your acceptance of the amended Privacy Statement. The amended Privacy Statement, if any, supersedes all previous versions.

Information we collect

DOCS and its affiliates only collect personal data required to serve the purpose for which it was collected. DOCS and its affiliates collect information that personally identifies you (“Personal Information”) directly from you when you voluntarily request information from DOCS and its affiliates or supply information through the Services. This includes any and all materials submitted by you when you fill out a submission form, questionnaire, or inquiry, or create a login account. “Personal Information” includes information such as email addresses, first and last names, dates of birth, IP addresses, browser-shared geolocation data, address and zip code information, and other information including what Services you have utilized or educational offerings you have completed. The purpose and basis for collecting this information is to ensure quality content, personalize and improve the Services, respond to inquiries, communicate special offers, and otherwise carry out our policies.

We also may collect information through the Services that does not, on its own, identify a specific individual (including Usage Data defined below). DOCS and its affiliates collect and processes this information to pursue its legitimate interests and rights. The purpose and basis for collecting this information is to ensure quality content, personalize and improve the Services, respond to inquiries, communicate special offers, and otherwise carry out our policies. If we link this information with your Personal Information in a way that renders it individually identifiable, we will treat it as Personal Information in accordance with the terms of this Privacy Statement.

As allowed by governing law, your use of the Site and the Services acknowledges your agreement that we may use your Personal Information as follows:

- to establish and manage business relations with you;
- to provide you with the Services and products you request;
- to respond to inquiries, requests and comments from you;

- to operate, improve and personalize the products and the Services we offer and to give each user a more consistent and personalized experience when interacting with us;
- to disclose it to the physician who provides you with services and his or her group practice to track your health education, and other uses of our Services;
- to communicate special offers, promotions and information about our company and the Services offered to you via email or to your mailing address, if you have provided one;
- to send you newsletters and information about products, the Services and promotions of our business partners and affiliates;
- for customer service, security, to detect fraud or illegal activities;
- to prevent or investigate activity we think may be potentially illegal, unlawful or harmful;
- for archival and backup purposes in connection with the provision of the Services;
- to better understand how you access and use the Site, for the purposes of trying to improve the Site, diagnose problems, administer the Site and respond to user preferences; and
- to enforce our other applicable policies.

When you use the Site we may, like most website operators, automatically collect certain non-identifying information about you, such as your movement about and through the Site, the type of browser or operating system you use, or the domain name of the website linked from which you were directed to the Site (“Usage Data”). We use Usage Data to operate, improve and personalize the Site, to provide customer service, and to detect, prevent and mitigate fraudulent or illegal activities. We, like many companies, use cookies and similar technologies such as web beacons to enhance your experience on the Site. These technologies are small text files that allow us to store information on your mobile device or computer hard drive so that we can recognize your browser and capture certain information, such as browsing history and activities conducted while using the Site. A cookie enables us to remember your account or specific pages you have visited so the next time you return to the Site you do not have to login to your account again or select specific content page again. You can adjust how your Internet browser (like Chrome or Safari) responds to cookies (e.g., to warn you every time a cookie is sent, or to turn off all cookies). See your browser’s Help menu for these instructions. Users who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before accessing the Site. By disabling your cookies, you may not have access to some of the features that enhance your user experience on the Site.

Sharing your personal data

In order to provide the Services to you, we may need to share your Personal Information as permitted by law. We do not sell the Personal Information we collect about you to third parties. We may, however, share your Personal Information with service providers or third parties in accordance with the business purposes set out in this Privacy Statement.

Any information we gather, whether voluntarily provided by you or automatically collected, may be used for our internal business purposes and disclosed to third parties as allowed by governing law as stated below.

- **Agents and Service Providers:** We employ individuals and may contract with other companies to perform functions on our behalf. Examples include creating and maintaining the Site, sending postal mail and e-mail, managing and updating customer lists, developing and delivering targeted advertising, providing analytics and site usage information, and providing other services related to the operation of our business. These third parties, contractors, consultants and other parties require the Personal Information to perform their functions on our behalf. These individuals and companies have agreed to keep your Personal Information confidential and comply with governing law.
- **Your Physician and His or Her Practice:** We will disclose the information we gather to the physician or physicians responsible for your care if: (a) you identify your physician and (b) your physician or his or her medical practice participates with DOCS and its affiliates. We share this Personal Information, including with respect to your health education and use of the Services, to allow your physician to better target educational offerings without duplicating learning that you have obtained through the Site. If you disclose your physician and agree to participate, we believe

this Service will benefit both you and your physician. Your physician and his or her medical practice may also use this information in required government and insurer reporting identifying patient education and in any other manner permissible under applicable state law.

- **Legal Compliance and Protection.** Notwithstanding any other statements or representations in this Privacy Statement or elsewhere on the Site, we reserve the right to disclose any information in our possession if we are required to do so by law or we believe, in good faith, that such a disclosure is necessary to comply with the law, court order, subpoena, civil investigatory demands, lawsuit requests or other government or law enforcement agency, defend our rights or property, or to respond to an emergency situation or protect the rights, property or safety of website users.
- **Corporate Transactions.** DOCS and its affiliates reserve the right to share information with its corporate affiliates and subsidiaries and to transfer Personal Information to a purchaser or successor entity in the event of a sale or other corporate transaction involving some or all of our business as permitted by governing law.

Security

We implement a variety of security measures to maintain the safety of your Personal Information. However, the security of information transmitted through the Internet can never be guaranteed. We (like all websites) cannot warrant or guarantee 100% security of any information you transmit to us through the Site.

We may make chat rooms, forums, message boards, news groups or other similar communication tools available to you. Please remember that information disclosed in these areas, if any, is public. You should exercise caution when disclosing Personal Information in these areas, as this information is made available to other users. Do not disclose information in these public forums that might be considered confidential or proprietary or that you do not wish to be publicly available or that you are prohibited from disclosing.

Managing “Do Not Track” signals

Some browsers have a Do Not Track (“DNT”) feature that lets you tell websites that you do not want your online activities tracked. When you choose to turn on the DNT setting in your browser, your browser sends a special signal to websites, ad networks, plug-in providers, and other web services you encounter while browsing to stop tracking your activity via cookies or other tracking technologies. The Site does not currently respond to DNT browser signals or mechanisms.

Third party links

The Site may contain links to websites maintained by third parties with which we have no affiliation. This Privacy Statement does not reflect the privacy practices of those sites, and you should consult the privacy policies of those sites to learn about their practices. A link to any third party site does not mean that we endorse it or in any way speak to the quality or accuracy of the information presented on it.

Additional protections for children

The Site is not designed for or targeted to children under the age of 18. DOCS and its affiliates will never knowingly solicit or collect Personal Information from a child under the age of 18 through the Site without verifiable parental consent or unless that child’s parent or legal guardian has submitted the information in connection with the Services. If we discover that a child under the age of 18 has submitted Personal Information without verifiable parental consent, we will delete that information.

Your choices about our collection and use of your Personal Information

- **Changing or Deleting Personal Data.** We strive to maintain the accuracy of Personal Information collected. We will work with you to correct any information you submitted to us upon your request. It may not always be possible to completely remove or modify information in our databases, although we will make reasonable efforts to do so upon your request.
- **Commercial Electronic Communications.** If you do not wish to receive communications from us, you may opt-out of receiving future communications by emailing compliance@docsdermgrou.com.
- **California residents have certain additional rights.**

Additional privacy rights (including those consistent with California law)

Beginning January 1, 2020, California residents may exercise certain privacy rights pursuant to the California Consumer Privacy Act of 2018 (“CCPA”). Your right to submit certain requests if you are a California resident are described below. DOCS and its affiliates have decided, notwithstanding such legal strictures only applying to California residents, to provide the following right to all residents of the United States of America (“USA”) using our Site. As such all USA residents may make the requests described below. Please note that when submitting a request, you will be asked to provide information to verify your identity before action is taken. You may designate an authorized agent to make the requests below on your behalf. An authorized agent must submit proof to us that he or she has been authorized by you to act on your behalf, and you will need to verify your identity directly with us.

Right to request more information

If you are a USA resident, you have the right to request information from us regarding the manner in which we share with third parties certain categories of information and the identities of the third parties with whom that information is shared. If you wish to exercise those rights, please email us at compliance@docsdermgrou.com

If you are a USA resident, you have the right to request more information regarding the following, to the extent applicable:

- The categories of Personal Information we have collected about you, as defined above.
- The categories of sources from which we have collected your Personal Information.
- The business or commercial purpose for why we collected or, if applicable, sold your Personal Information.
- The categories of third parties with whom we shared your Personal Information in the past 12 months.
- The specific pieces of Personal Information we have collected about you.
- The categories of Personal Information that we have shared with third parties about you for a business purpose.

You may submit a request for the information above by emailing us at info@docsdermgrou.com. DOCS and its affiliates will not provide any information if it would otherwise violate state law, including any applicable privileges. In connection with submission of your request, we will take steps to verify your identity, and you will need to verify your identity before action is taken.

Right to request deletion of your Personal Information

If you are a USA resident, you have the right to request that we delete your Personal Information collected or maintained by us. Once we receive your request, we will let you know what, if any, Personal Information we can delete from our records, and we will direct any service providers with whom we shared your Personal Information also to delete your Personal Information from their records. There may be circumstances in which we cannot delete your Personal Information or direct service providers to delete your Personal Information from their records. For example, we may be incapable of deleting your Personal Information if we need to: (1) retain your Personal Information to complete a transaction or provide goods or the

Services; (2) detect security incidents; (3) protect against unlawful activities; (4) identify, debug or repair errors; or (5) comply with a legal obligation. Your physician and/or his or her group practice may also not be able to delete your Personal Information, furnished in accordance with this Privacy Statement, if they have incorporated it into your medical record or if they are using it in connection with other operational needs. You may submit a request to delete your Personal Information by emailing us at compliance@docsdermgroupp.com. DOCS and its affiliates will not delete any information if it would otherwise violate state law, including any applicable privileges. In connection with submission of your request, we will take steps to verify your identity and you will need to verify your identity as required under applicable state law or default under California law before action is taken.

Verification of requests

Upon submission of a request for information or a request to delete information described above, we will take reasonable steps to confirm that the person submitting the request for information or the request to delete information is the person to whom the information relates, and to prevent unauthorized access or deletion of information. The specific steps taken to verify the identity of the requesting person may vary based on the nature of the request, including the type, sensitivity and value of the information requested, the risk of harm posed by unauthorized access or deletion, the likelihood that fraudulent or malicious actors may seek the information, the robustness of Personal Information provided to verify your identity, the nature of our business relationship with you, and available technology for verification.

We will generally try to avoid requesting additional information from you for the purpose of verification. However, we may need to do so if we cannot verify your identity based on the information already maintained by us. If we request additional information to verify your identity, it will be for that purpose only, and will be deleted as soon as is practical after processing the request, except as otherwise provided by law.

The following generally describes the verification processes we use:

- If you have a **password-protected account** with us, we may use existing authentication practices to verify your identity, but will require re-authentication before disclosing or deleting data. If we suspect fraudulent or malicious activity relating to your account, we will require further verification (as described below) before complying with any request to know or delete your Personal Information.
- For **requests to know categories of Personal Information**, we will verify your identity to a reasonable degree of certainty by matching at least two data points provided by you with reliable data points maintained by us.
- For **requests to know specific pieces of Personal Information**, we will verify your identity to a reasonably high degree of certainty by matching at least three data points provided by you with reliable data points maintained by us. We will also require a declaration, signed under penalty of perjury, that the person requesting the information is the person whose information is the subject of the request. We will maintain all signed declarations as part of our records.
- For **requests to delete your Personal Information**, we will verify your identity to a reasonable degree or a reasonably high degree of certainty depending on the sensitivity of the Personal Information and the risk of harm posed by unauthorized deletion. We will act in good faith when determining the appropriate standard to apply.

If there is no reasonable method by which we can verify your identity, we will state so in response to a request to know or delete your Personal Information, including an explanation of why we have no reasonable method to verify your identity. As indicated above, DOCS and its affiliates will not delete any information if it would otherwise violate state law, including any applicable privileges.

Right to non-discrimination for the exercise of USA resident's privacy rights

By exercising any of the above listed privacy rights conferred by the CCPA or by other state laws, if you are a USA resident, you have the right to receive non-discriminatory treatment by us. This means that, consistent with applicable laws including

California law, we will not deny providing goods or the Services to you, charge you different prices or provide a different level or quality of goods and the Services to you unless those differences are related to the value of your information. You may need to provide Personal Information again to create a new account to access certain Services after your request to delete your Personal Information but we will comply with legal requirements here not to discriminate after you exercise your rights.

Contacting us

If you have questions or comments about the above Privacy Statement or would like to review, update, correct or delete your Personal Information that you have provided, please visit the [“Contact Us”](#) page and fill out the contact form.