



Privacy Policy

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General Statement

Sermo® is the world's social platform for doctors with over 800,000 verified and credentialed members across 150+ countries. Our community of doctors come to Sermo to seek real life, peer-to-peer medical expertise and share their honest experiences about their profession.

Sermo's mission is to revolutionize real-world medicine by democratizing medical knowledge and insights to improve clinical outcomes. Our unique and collaborative network benefits each stakeholder in the healthcare ecosystem from our members and clients to the real-world medical community at large.

This Privacy Policy applies to all services and websites that are offered and provided by **Sermo®**, its divisions and affiliates, including WorldOne Research Limited, WorldOne, Inc. and Sermo, Inc.

This Privacy Policy ("Privacy Policy") discloses the privacy practices for Sermo ("Sermo", "we", "our" or "us") with regard to your ("You", "Your", "you", or "your") use of our services through our website (www.sermo.com) and our mobile application (the "Site", or collectively the "Sites"). The purpose of this document is to set out the principles governing our use of the personal information that we may obtain about you. We ask you to read this Privacy Policy carefully. We encourage members come to us with any questions, comments or suggestions having read this Privacy Policy.

In the course of providing You a high quality Sermo experience and through Your interactions with us, Sermo collects information about You and about Your use of our Sites. Sermo takes Your privacy and its obligations under data protection laws very seriously, and we strive to be transparent about our treatment of Your information. We use the term "personal information" to refer to any information that identifies, relates to, or describes an identified or identifiable natural person.

This Privacy Policy explains the following:

1. Information Collection and Use
2. How and Why We Share Your Information
3. Communications and Opt Outs
4. Data Storage, Retention, and Transfers
5. How We Secure Your Information
6. Third Party Links
7. When You Choose Not to Provide Personal Information



8. Privacy Rights
9. Jurisdiction-Specific Notices
10. Changes to this Privacy Policy
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Jurisdiction-Specific Notices

Residents in the European Economic Area ("EEA"), Switzerland, United Kingdom ("UK"), California, Colorado, Connecticut, Utah, and Virginia should refer to the body of this Privacy Policy as well as the "Jurisdiction-Specific Notices" section below for additional information that may be applicable to them.

1. Information Collection and Use

We collect and process personal information for our internal and Site-related purposes, and in order to provide, improve, and enhance the Sermo services we offer.

(a) Registration information

Before You can register for Sermo, You will need to provide Your name, address, phone number, email address, a copy of Your professional license or credentials, and if required, Your national professional registration number, for example:

- NPI or AMA number, if you are a United States practitioner
- GMC number, if you are a United Kingdom practitioner
- RPPS/ADELI/ORDRE number, if you are a France practitioner
- Numero Colegiado, if you are a Spain practitioner
- CRM number, if you are a Brazil practitioner

We will use this information to set-up, validate and administer Your account. You must also agree to the privacy practices set out in this Privacy Policy, as well as agree to our [Terms of Service](#) and [Code of Conduct](#) in order to register.

In order to verify your identity and as part of the registration process, You will be asked to provide photo ID, a selfie, and certain information regarding your place of work. This and additional identity verification information may be collected by external identity verification processors on our behalf. To the extent identity verification information is collected by an external identity verification processor, such processors' collection is subject to their own privacy policies and Sermo is not responsible for the privacy practices of such other processors. We will use this information to verify your identity, protect the integrity of Sermo



and prevent fraud, ensuring all members in our platform are legitimate healthcare professionals. We may also use the details you provide on your place of work to contact them as part of the verification process. We may periodically ask You to revalidate your credentials, in which case you will be required to re-confirm Your registration information and provide recent copies of your photo ID and selfie.

We may use Your information to send You information about our services and provide You with information about other goods and services we offer that are similar to those that You have already used or enquired about to market to You. We may also use this information to provide You, or (based on Your consent, if and when required under applicable law) permit selected third parties to provide You, with information about goods or services we feel may interest You. If You are an existing customer, subject to your preferences, we will primarily contact You by electronic means (e.g., email or SMS), with information about goods and services similar to those which You have expressed interest in.

Your information may also be used to help prevent spam, fraud, or abuse. You may use Your settings for email and mobile notifications to control notifications You receive from our services. You may also unsubscribe from a notification by following the instructions provided with the notification or instructions available via the Site.

(b) Personal account information

Once You are a registered member of Sermo, You may voluntarily provide additional information in Your personal account profile which describes You, including but not limited to Your birth date, social network username, medical school, institutional affiliations, credentials, professional experiences, memberships, evidence of Your specialities, academic background, biography, type of practice, place of employment, work address and residential address. Providing additional information in Your personal profile is not required and entirely optional, but if you choose to provide such additional information, it may allow You to derive greater benefits from using Sermo's services, such as receiving a higher number of profile-targeted invitations to participate in surveys. This information can be updated or removed by You at any time by visiting the "My Account" page, and You may choose whether to make some of this information publicly visible to other social network participants.

(c) Other information we may receive from You

A key part of Sermo involves encouraging the free flow of ideas, opinions, and content between medical professionals, and most of this information provided by users is available to be viewed by other Sermo users and third parties with whom we are conducting business. When You post content such as articles, comments, and photos on Sermo, we collect the information you post. You can also present and provide interviews and webinars on Sermo. You can utilize settings in the platform to control how other users view your profile.



When You post content such as articles, comments, and photos on Sermo, we may also receive additional data (or metadata) related to the content, for example, the time, date, and place You took a photo.

We partner with third parties to provide you with opportunities to participate in paid medical surveys. Sermo may also invite You to complete Sermo surveys in order to better match You with future paid medical surveys and to improve our Sites. We collect personal information You may provide in response to these surveys, such as information about Your work environment and professional experiences. Some surveys may further request sensitive personal information, such as your gender, race and ethnicity. The purpose for such requests will always be informed to you in each survey. We will disclose Your responses to these surveys to our third-party partners only subject to your consent.

To set-up and manage Your Sermo account, we may ask You to provide some financial information in order to allow You to be compensated for participating in paid medical surveys and other Opportunities (see our [Terms of Service](#)). If You choose to withdraw these amounts through gift cards or charitable donations, we will need to collect information from You in order to process these transactions. Where such Opportunities are offered by third parties, we will also need to collect information about Your participation in such Opportunities from those third parties, in order to validate payments. We may also need to send the information set out in this section to trusted third parties that we appoint to process and administer such payments.

We also automatically collect information when You use and navigate the Sermo site, for example, when You follow a group or individual, visit a Sermo page, send or receive a message, click on or otherwise interact with content, post content, view or click on ads we display, perform a search, or participate in polls. We may use this information to make inferences, such as about the content, subjects and ads You may be interested in. See our Cookie information section below and our [Cookie Policy](#) for more details.

We also collect information when You invite a colleague to use Sermo, such as Your colleague's name email address and phone number. If You provide us with personal information regarding another individual, such as when You invite a colleague to use Sermo, You represent that You have that person's consent to give us his or her information and to permit us to use the information in accordance with this Privacy Policy.

Sermo does not collect identifiable personal health information or other health or medical information about individuals. Sermo does not collect or maintain information that would associate a submission with a specific patient. So please ensure that You do not disclose or post anything that would allow a patient to be identified, such as non-anonymized medical records. Note also that Sermo does not possess a data-based key to re-identify patient data. If You post any identifiable personal health information about an individual, please inform us so that such information can be removed from the Sites or redacted to remove the identifying information by Sermo.

(d) **Information we receive from third parties (including partners and affiliates)**

We may obtain data from our affiliates or our advertising partners, customers and other third parties, such as Definitive Healthcare and IQVIA, which helps us (or them) deliver sponsored content onto Sermo, understand online activity, and generally improve Your Sermo experience. Such third parties may share information about You, including a browser cookie ID, website URL visited, mobile device ID, or cryptographic hash of a common account identifier (e.g. usernames or email address), which enables Sermo to provide ads on the Site and monitor Your preferences and Your interest in them. However, You can choose to block certain ads by enabling an ad blocker to Your web browser so that Your information will not be matched to information shared by ad partners for this purpose. Please see the “Cookie information” section below and our Cookie Policy for more information.

(e) **Other Information We Collect**

We also receive and use Your information when You decide to contact us. If You email us, we may keep Your message, email address and contact information. We need this to categorise Your enquiry, respond to it and, if applicable, investigate any breach of our Terms of Service, Code of Conduct, or this Privacy Policy. We may also use this information to customise and improve our services over time. We do not use this information for external advertising.

(f) **DMD Healthcare Communications NetworkSM Privacy Statement**

Sermo and its related digital services participate in the DMD Healthcare Communication NetworkSM (the “DMD Network”) and as such has implemented various technologies for universal registration/login among all Network member websites. These technologies are managed by DMD Marketing Corp. (“DMD”), and may involve the collection, receipt, and sharing of information with DMD, its clients and other Network members. As a result, Sermo may receive your personal information from DMD. If You would like to understand how this digital service’s participation in the Network affects Your privacy, please click [here](#). Please note that the Network registration/login system may be different from the registration/login used by this digital service for other products and services. To the extent that your information has been provided to Sermo by DMD, and there is a conflict between anything in this Privacy Policy and the policy for the Network technologies, the conflict will be resolved in favour of the policy applicable to the Network technologies.

(g) **Cookie information**

We and our third-party partners, such as advertising partners and analytics providers, collect information by automated means. We use cookies and similar technologies to collect your IP address, information about your device (such as your browser characteristics, device IDs and characteristics, and operating system version) and information concerning your usage of our Site (including the link you used to reach a given webpage). We use this information to improve Your experience on the Site, to determine how many users have visited particular webpages, viewed particular content, or opened messages or alerts, to improve our



marketing activities, to maintain your preferences, and to and to enforce our Terms of Service and prevent malicious conduct. For example, by setting a cookie on Your browser, You may not have to log in a password more than once, thereby saving time. You may be able to change the settings of Your browser to block or delete cookies. You may be able to reset Your browser to refuse all cookies or allow Your browser to show You when a cookie is being set. If You reject the cookies on the Site, You may still be able to use the Site, but Your use may be limited in some areas or limited to certain functions of the Site. In some cases, our third-party partners may process information collected by cookies and similar technologies on the Sites. Please see our [Cookie Policy](#) for more information.

The Sermo Site uses session cookies and persistent cookies to better understand how You interact with the Site, to monitor aggregate usage by and web traffic, to enable You to access surveys and to make improvements the Site. You can learn more about our use of cookies and how to opt out tracking by cookies or control how information collected by cookies is used in our [Cookie Policy](#).

Your browser or device may include "Do not Track" functionality; please note that we do not respond to such signals unless required by applicable law.

(h) **Log information**

When You use our Site, Sermo may use information, such as Your IP address, browser type, operating system, referring web page, pages previously visited, location (see below), mobile carrier, device and/or application identifiers, search terms, and cookie information to align our services with changes in Your device usage patterns, to administer the Site and to gather certain demographic information for aggregate use. We may also receive log information when You view or interact with links on the Sermo site, including sites operated by third parties.

(i) **Location information**

We may receive information concerning Your location if, for example, You choose to post content which reveals this information. We may also determine Your general location (e.g., city, state) using information from Your device, such as GPS data, information about wireless networks or cell towers near Your device, or IP address. We may use this to improve and customise our service to You, for example by making You aware of content, people, and ads more relevant to Your location. You can choose to turn off location services on Your device at any time if You prefer, however if You do so You will not benefit from such tailored content.

2. How and Why We Share Your Information



We will process the information we collect about You in accordance with this Privacy Policy or where You have otherwise authorised us to do so by granting us Your consent. We may share any of the categories of personal information listed above for our commercial and other business purposes as described below.

- (a) **Business partners, clients and advertising partners.** Sermo is free and we want to make sure it remains this way for a long time. Organizations seeking physician expertise, such as pharmaceutical companies, medical device firms, and biotech firms underwrite the market research and engagement sponsorship opportunities within our Site and help us fund the delivery of Sermo to You. We may direct You to pages which contain commercial content or You may be presented with the opportunity to engage with sponsored content through our social feed or such as at the conclusion of a RealTime survey or via Sermo Conversations, Sermo Promo and Sermo Ratings, which are further described in the [Terms of Service](#). If you are USA resident, We may provide our partners and clients with engagement effectiveness metrics that may include the sharing of some of your personal information for performance assessment purposes, such as your professional registration number, interactions with our website, impressions, responses to surveys and polls, and user content you may provide to publicly post via the Sites. To the extent required by law, we will obtain Your direction prior to providing such personal information.

We may share your personal information with our partners, such as DMD in relation to participating in the DMD Network.

To protect the anonymous nature of our physician conversations from other users, we will identify sponsored content with logos or with words such as "Sermo Client", "Client Page", "From Industry", "Ad", "sponsored polls" or "sponsored page" or other identifiers instead of using Your information, prior to Your engagement with the sponsored content.

As a member, Sermo (or its service providers or affiliates on Sermo's behalf) may contact You multiple times via any and all contact information that You provide to Sermo.

We may collect user content You provide to publicly post via the Site (e.g., comments). As such, please consider carefully what information You choose to make public on the Site.

- (b) **Service providers and vendors.** We engage service providers to perform certain functions on our behalf and help us provide our services. We may share Your information with such service providers, who are carefully selected by us, where we impose legal obligations on them which are consistent with this Privacy Policy, and on the condition that they act only on our instructions and keep Your information secure.
- (c) **Affiliates.** We may also share Your information with our affiliate entities within the Sermo group in the normal course of our business operations. We do so for business purposes, such as to communicate with you and to promote and provide our services. We have implemented technical and contractual measures to help ensure that Your information is secure through-out the Sermo group.

- (d) **Sale of assets, merger, acquisition, bankruptcy.** Information collected from You or received by us from others about You may be transferred to a third party to the extent permitted by law, as a result of a sale or acquisition, merger or bankruptcy involving Sermo.
- (e) **Legal requests.** Sermo takes Your right to privacy very seriously and has taken measures to safeguard Your personal information. Sermo will disclose Your personal information as set out above or in the event we are required to do so by law, rule, regulation, law enforcement, governmental official, legal authority, or similar requirements.

3. Communications and Opt Outs

By providing an email address on our Sites, you agree that we may contact you in the event of a material change in this Privacy Policy, to provide you with any service related notices, or to provide you with information about our events, invitations, or related educational information. We currently provide the following opt-out opportunities:

- (a) At any time, you can follow a link provided in offers, newsletters or other email messages (except for e-commerce confirmation or service notice emails) received from us to unsubscribe.
- (b) At any time, you can amend your email and mobile notification preferences by accessing <https://app.sermo.com/settings/emailnotifications>.
- (c) You can opt-out of receiving text messages by responding to any of our text messages with the following replies: STOP, END, CANCEL, UNSUBSCRIBE, or QUIT. If you opt-out, we may still send you messages regarding the status of your orders and other service-related communications.

Notwithstanding anything else in this Privacy Policy, please note that we always reserve the right to contact you in the event of a change in this Privacy Policy, or to provide you with any service-related notices.

4. Data Storage, Retention and Transfers

Sermo's data storage servers are located in Europe and in the United States of America and are managed by service providers in the cloud. We endeavour to have technological and organisational measures to protect Your information, both during transmission and once we receive it.

Subject to implementing relevant safeguards under data protection laws, the personal information and other data we collect from You may be transferred to and stored at a destination outside your country of residency, as informed above. EEA. It may also be processed by staff operating outside of your country of residency who work for us or for one of our service providers. We have implemented technical and organisational measures as required under applicable law and treat Your Information in accordance with this Privacy Policy.

We retain the personal information you provide while your membership is in existence or as needed to provide you services as listed in this Privacy Policy. It may persist in copies made for back up and business continuity purposes for additional time, including information required for regulatory and legal compliance.



If you choose to end your relationship with us, we generally dispose of account information consistent with our Terms of Service, corporate data retention policy or other legitimate business need. We may retain some of your personal information even after you have closed your account, or after our contractual relationship ends, if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our Terms of Service, or fulfill your request to “unsubscribe” from further messages from us.

5. How We Secure Your Information

We are committed to protecting the security of Your information. We use a variety of industry-standard security technologies and procedures designed to help protect Your information from unauthorized access, use, or disclosure. Despite these measures, You should know that we cannot fully eliminate security risks associated with information and transmission of data over the internet, it can never be completely secure. In the event of a data security breach, we will take all essential actions as required under applicable laws.

6. Third Party Links

The Site may contain links to third party sites. The linked sites are not necessarily under the control of Sermo. Please be aware that Sermo is not responsible for the privacy practices of such other sites. Sermo encourages You to be aware when You leave this Site and to read the privacy policies of each and every web site that collects personal information. If You decide to access any of the third-party sites linked to this Site, You do this entirely at Your own risk. Any links to any partner of the Site is responsibility of that partner and Sermo shall not be responsible for notification of any change in name, or location of any information on the Site.

7. When You Choose Not to Provide Personal Information

Where we need to collect Your information as required by applicable law, for security reasons or under the terms of a contract with You and You do not to provide that data upon request, we may not be able to perform such contract (for example, to provide You with Sermo services). In this case, we may have to cancel a service You have with us, but we will notify You if this is the case at the time.

8. Privacy Rights

Certain jurisdictions have specific legal requirements and grant privacy rights with respect to personal information, and we will comply with restrictions and any requests you submit as required by applicable law. For example, you may have the right to: (1) obtain a copy of personal information we maintain about you in a portable format; (2) correct inaccuracies or incompleteness in your personal information; (3) object to the continued processing or use of your personal information; (4) complain to a supervisory authority; (5) or request that personal information be blocked, anonymized or deleted. You may also have the right to not be discriminated against for exercising your privacy rights. If you are a California, Colorado, Connecticut, Utah, Virginia, EEA, Switzerland, or UK resident, see our

"Jurisdiction-Specific Notices" section below for additional information as to how to exercise rights under the laws of those jurisdictions. If you are located outside that jurisdiction and seek to exercise your rights under the law of another jurisdiction, please contact us by emailing support@sermo.com.

To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information. When you make a request, we may require that you provide information and follow procedures so that we can verify your identity (and the applicable jurisdiction). The verification steps we take may differ depending on your jurisdiction and the request. Where possible, we will attempt to match the information that you provide in your request to information we already have on file to verify your identity. If we are able to verify your request, we will process it. If we cannot verify your request, we may ask you for additional information to help us do so.

We will respond to your request within the time period required by applicable law. However, we may not always be able or required to comply with your request, in whole or in part, and we will notify you in that event.

9. Jurisdiction-Specific Notices

(a) EEA, Switzerland, or UK Residents

Sermo believes that it is important that individuals are given the opportunity to exercise choice with respect to how their personal information is collected and used. Some data protection laws, including the European Union's General Data Protection Regulation ("GDPR"), provide you with certain rights in connection with personal information you have shared with us.

Lawful Bases to Process Your Information under the GDPR. Sermo is the data controller of Your information and when we collect and process Your information, we rely on Your consent or our legitimate business interests as the legal basis to do so. The GDPR provides for six legal bases that permit an organisation like Sermo to lawfully process Your information. The six legal bases are:

- i. **You have given consent to the processing of Your information for one or more specific purposes.** For example: turning on certain cookies on our Site or consenting to a specific information processing request contained within an online survey.
- ii. **Processing is necessary for the performance of a contract to which You are a party or in order to take steps at the request of You prior to entering into a contract.** For example: when You agree to be a Sermo member Sermo will then process Your information to: verify Your identity, location and professional specialisms, determine the market research opportunities [whether via email or telephone surveys] You are eligible for, match You with third party market research targeting lists, project related pre and post market research analytics provided that Your personal information will not remain with a third party or be used for any other purpose; use Your data to

respond to regulatory requests, create and administer an incentives account for the incentives You earn as a Sermo panel member and respond to Your queries via our Member Care team.

- iii. **Processing is necessary for compliance with a legal obligation to which Sermo is subject.** For example: accurately reporting taxes, complying with financial transparency laws (e.g. Loi Bertrand and Loi Anti-Cadeaux in France, the USA Sunshine Act, the EPFIA Disclosure requirements in Europe or the ABPI Disclosure requirements in UK) or reporting pharmacovigilance and product safety adverse events information.
- iv. **Processing is necessary in order to protect the vital interests of You or of another natural person.** For example: reporting Your information as part of a potentially life-saving or life-threatening event, via Sermo's obligation to report adverse events.
- v. **Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Sermo.** This legal base will probably not be used by Sermo.
- vi. **Processing is necessary for the purposes of the legitimate business interests pursued by Sermo or by a related third party, except where such interests are overridden by Your interests or fundamental rights and freedoms.** For example: Your information is an important element in Sermo's provision of a global social network, free at the point of access. As a result Sermo is able to provide its social platform-based tools and products, such as Sermo Drug Ratings™ tool that is based upon the drug ratings You provide and then You have the right to use the Sermo Ratings results via the Site. The Sermo Community team also uses Your information to help administer this Site and Sermo's market research and social network activity that are in part generated from this Site.

If you are resident in the EEA, Switzerland, or the UK, you have the following rights:

- i. **The right to be informed.** The general section of this Privacy Policy describes the types of personal information we collect, how we collect it, and how we use it. For information on our retention practices, please see "Data, Storage, and Retention" section above. We rely on a variety of legal bases to process your personal information, as described above.
- ii. **The right of access.** You have the right to request a copy of your personal information which we hold about you.
- iii. **The right of correction.** You have the right to request correction or changes of your personal information if it is found to be inaccurate or out of date.
- iv. **The right to be forgotten.** You have the right to request us, at any time, to delete your personal information from our servers and to erase your personal information when it is no longer necessary for us to retain such data. Note, however, that the deletion of your personal information will likely impact your ability to use our services.
- v. **The right to object (opt-out).** You have the right to opt-out of certain uses of your personal information, such as direct marketing, at any time
- vi. **The right to data portability.** You have the right to a "portable" copy of your personal information

that you have submitted to us. Generally, this means your right to request that we move, copy or transmit your personal information stored on our servers / IT environment to another service provider's servers / IT environment.

- vii. **The right to refuse to be subjected to automated decision making, including profiling.** You have the right not to be subject to a decision and insist on human intervention if the decision is based on automated processing and produces a legal effect or a similarly significant effect on you.
- viii. **The right to lodge a complaint with a supervisory authority.** You may also have the right to make a GDPR complaint to the relevant Supervisory Authority. A list of Supervisory Authorities is available here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

If you need further assistance regarding your rights, please contact us using the contact information provided below and we will consider your request in accordance with applicable law:

- [Contact Us](#), choosing the specific Privacy Inquiry type;
- Send us an e-mail at support@sermo.com from the e-mail address You registered with, or;
- Send us a postal letter to:

Data controller: WorldOne Research Limited, WorldOne, Inc. and Sermo, Inc. ("Sermo")

Data controller address: Fora 42 Berners Street London W1T 3ND, United Kingdom

Data controller primary contact: Data Protection Officer, sermo.dpo@sermo.com

For your protection, we may need to verify your identity before responding to your request, such as verifying that the email address from which you send the request matches your email address that we have on file. If we no longer need to process personal information about you in order to provide our services or our Sites, we will not maintain, acquire or process additional information in order to identify you for the purpose of responding to your request.

In some cases our ability to uphold these rights for you may depend upon our obligations to process personal information for security, safety, fraud prevention reasons, compliance with regulatory or legal requirements, or because processing is necessary to deliver the services you have requested. Where this is the case, we will inform you of specific details in response to your request.

(b) **California Residents**

During the last twelve (12) months, we have collected the following categories of personal information from California consumers. Some of the categories of information collected specifically concerns our employees or contractors as opposed to consumers who purchase our products.

Please see our Cookie Policy for information about the collection and use of personal information by third parties who process information collected by cookies and related technologies that we permit them to use on the Site. Except as indicated below in the "California Job Applicants" section and the Information



Collection and Use section, we do not seek to collect any additional "sensitive personal information" (as defined in the California Consumer Privacy Act, as amended by the California Privacy Rights Act (the "CCPA")).

Category (* may constitute "sensitive personal information" under the CCPA)	Examples of Identifiers We Collect	Sold or Shared	Criteria used to determine retention periods	Disclosed To
Identifiers	First and last name, username, unique personal identifier, online identifier, IP address, email address, physician license, or professional credentials, social network username, National Provider Identifier (NPI) Number or Your American Medical Association Number	Sold and shared	The duration of our relationship with you; the length of time necessary to complete a transaction; whether your personal information is a sensitive type; whether you specifically consented to retain the data; and our legal, contractual or similar obligations to retain or delete the data.	Service providers, affiliates, business and advertising partners, and those third parties to whom you or your agents authorize us to disclose to
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))*	A name, address, telephone number, financial information, education, employment, Social Security number, driver's license or state identification card number	Not sold or shared	Same as above.	Service providers, affiliates, and those third parties to whom you or your agents authorize us to disclose to
Commercial information	Information relating to amounts on gift cards or charitable donations in relation to your transactions.	Not sold or shared	Same as above.	Service providers, affiliates, and those third parties to whom you or your agents authorize us to disclose to
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Sold and shared	Same as above.	Service providers, affiliates, business and advertising partners, and those third parties to whom you or your agents authorize us to disclose to
Professional or employment-related information	Medical school, institutional affiliations, professional experiences, professional credentials, memberships, evidence of specialties, academic	Sold; not shared	Same as above.	Service providers, affiliates, business and advertising partners, and those third parties to



	background, type of practice, place of employment, work address			whom you or your agents authorize us to disclose to
Geolocation information	Physical location or movements.	Not sold or shared	Same as above.	Service providers, affiliates, and those third parties to whom you or your agents authorize us to disclose to
Inferences drawn from other personal information	We may use the information in content posted, ads viewed, or messages sent and received to make inferences, such as about the content, subjects and ads You may be interested in. Also, we make inferences reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Not sold or shared	Same as above.	Service providers, affiliates, and those third parties to whom you or your agents authorize us to disclose to
Sensory Data	Audio, electronic, visual information.	Not sold or shared	Same as above.	Service providers, affiliates, and those third parties to whom you or your agents authorize us to disclose to
Sensitive information*	Gender, race and ethnicity	Not sold or shared	Same as above.	Service providers, affiliates, and those third parties to whom you authorize us to disclose to

California Residents that are Job Applicants

When you apply for a job with Sermo, information may be collected about you in multiple ways: you may provide it to us in connection with your application; we may make observations in the application process or collect information from public information sources; or you may authorize us to collect information from other sources, such as a former employer or reference.

The following table describes our practices with regard to information submitted in the job application process. If you use our Sites in the job application process, additional information may be automatically collected, as described above.

Category (* may constitute "sensitive personal information" under the CCPA)	Examples	Sold or shared	Criteria used to determine retention periods	Disclosed to
Identifiers*	name, email address, phone number, and contact address, username, social media handle, Social Security number	Not sold or shared	The duration of our relationship with you; the length of time necessary to complete a transaction; whether your personal information is a sensitive type; whether you specifically consented to retain the data; and our legal, contractual or similar obligations to retain or delete the data.	Service Providers
Protected Classifications*	gender, race and ethnicity, date of birth	Not sold or shared	Same as above.	Service Providers
Geolocation Information*	Location information (e.g., ZIP code, IP address)	Not sold or shared	Same as above.	Service Providers
Professional or employment-related information.	employer's name, employer's address	Not sold or shared	Same as above.	Service Providers
Education Information	institutions attended, degrees and certifications attained	Not sold or shared.	Same as above.	Service Providers

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

Rights Specific to California Residents

Under the CCPA, a California resident has the following rights:



- i. to request additional information about our data collection, use, disclosure, and sales practices in connection with your personal information;
- ii. to request the specific personal information collected about you during the previous 12 months;
- iii. to request the deletion of the personal information we have about you, with exceptions;
- iv. to request a restriction on certain processing of personal information;
- v. to request correction of inaccurate information, and;
- vi. to opt-out of the selling or sharing of personal information, as defined by the CCPA.

You may not be discriminated against for exercising your California privacy rights. You may submit a request to exercise your rights under the CCPA through one of the following means:

- [Contact Us](#), choosing the specific Privacy Inquiry type;
- Send us an e-mail at support@sermo.com with the subject heading "California Privacy Rights";
- To opt-out of the selling or sharing of personal information, you may submit a request via our dedicated online form, or;
- a letter to us at the address listed in the "How to Contact Us."

Upon receiving your request, we will confirm receipt of your request by email. To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. In some instances, such as a request to delete personal information, we may first separately confirm that you would like for us to in fact delete your personal information before acting on your request.

We aim to respond to your request as soon as reasonably practicable and consistent with any applicable laws. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf through these means. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

California residents are also entitled to contact us to request information about whether we have disclosed personal information to third parties for the third parties' direct marketing purposes. Under the California "Shine the Light" law, California residents may opt-out of our disclosure of personal information to third parties for their direct marketing purposes. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. Please be aware that not all information sharing is covered by the California privacy rights requirements and only information on covered sharing will be included in our response. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this paragraph.



You can learn more about how to submit a data rights request, or appeal denial of a request, by emailing support@sermo.com.

(c) **Colorado Residents**

Colorado residents have certain rights around Sermo's collection, use, and sharing of their personal information. Sermo sells your personal information. Sermo does not engage in profiling in furtherance of decisions that produce legal or similarly significant effects. Sermo engages in "targeted advertising" as that term is defined in the Colorado Privacy Act ("CPA").

Sermo collects various categories of personal information when you use our Sites or services. A more detailed description of the information Sermo collects and how we use it is provided above in "Information Collection and Use" section. The "How and Why We Share Your Information" section describes the categories of third parties with whom we share personal information, and what information may be shared under different circumstances. If you are a resident of Colorado, you have the right to:

- i. request to know what personal information has been collected about you, and to access that information;
- ii. request to correct inaccuracies in your personal information;
- iii. request deletion of your personal information, subject to exceptions;
- iv. obtain a copy of your personal information; and
- v. opt out of selling, profiling, and targeted advertising, as defined by the CPA.

Also, a Colorado consumer may not be discriminated against for exercising the consumer's Colorado privacy rights. You may submit a request to exercise your rights under the CPA through one of the following means:

- [Contact Us](#), choosing the specific Privacy Inquiry type;
- Send us an e-mail at support@sermo.com with the subject heading "Colorado Privacy Rights";
- To opt-out of the selling or sharing of personal information, you may submit a request via our dedicated online form, or;
- a letter to us at the address listed in the "How to Contact Us."

You can learn more about how to submit a data rights request, or appeal denial of a request, by emailing support@sermo.com.

(d) **Connecticut Residents**

Connecticut residents have certain rights around Sermo's collection, use, and sharing of their personal information. Sermo sells your personal information. Sermo does not engage in profiling in furtherance of



decisions that produce legal or similarly significant effects. Sermo engages in “targeted advertising” as that term is defined in the Connecticut Data Privacy Act (“CTDPA”).

Sermo collects various categories of personal information when you use our Sites or services. A more detailed description of the information Sermo collects and how we use it is provided above in “Information Collection and Use” section. The “How and Why We Share Your Information” section describes the categories of third parties with whom we share personal information, and what information may be shared under different circumstances. If you are a resident of Connecticut, you have the right to:

- i. request to know what personal information has been collected about you, and to access that information;
- ii. request to correct inaccuracies in your personal information;
- iii. request deletion of your personal information, subject to exceptions;
- iv. obtain a copy of your personal information, and;
- v. opt out of selling, profiling, and targeted advertising, as defined by the CTDPA.

Also, a Connecticut consumer may not be discriminated against for exercising the consumer’s Connecticut privacy rights. You may submit a request to exercise your rights under the CTDPA through one of the following means:

- [Contact Us](#), choosing the specific Privacy Inquiry type;
- Send us an e-mail at support@sermo.com with the subject heading “Connecticut Privacy Rights”;
- To opt-out of the selling or sharing or personal information, you may submit a request via our dedicated online form, or;
- a letter to us at the address listed in the “How to Contact Us.”

You can learn more about how to submit a data rights request, or appeal denial of a request, by emailing support@sermo.com.

(e) **Utah Residents**

Utah residents have certain rights around Sermo's collection, use, and sharing of their personal information. Sermo sells your personal information. Sermo engages in “targeted advertising” as that term is defined in the Utah Consumer Privacy Act (“UCPA”).

Sermo collects various categories of personal information when you use our Sites or services. A more detailed description of the information Sermo collects and how we use it is provided above in “Information Collection and Use” section. The “How and Why We Share Your Information” section describes the categories of third parties with whom we share personal information, and what information may be shared



under different circumstances. If you are a resident of Utah, starting December 31, 2023, you have the right to:

- i. request to know what personal information has been collected about you, and to access that information;
- ii. request to correct inaccuracies in your personal information;
- iii. request deletion of your personal information, subject to exceptions;
- iv. obtain a copy of your personal information, and;
- v. opt out of selling and targeted advertising, as defined by the UCPA.

Also, a Utah consumer may not be discriminated against for exercising the consumer's Utah privacy rights. You may submit a request to exercise your rights under the UCPA through one of the following means:

- [Contact Us](#), choosing the specific Privacy Inquiry type;
- Send us an e-mail at support@sermo.com with the subject heading "Utah Privacy Rights";
- To opt-out of the selling or sharing or personal information, you may submit a request via our dedicated online form, or;
- a letter to us at the address listed in the "How to Contact Us."

You can learn more about how to submit a data rights request, or appeal denial of a request, by emailing support@sermo.com.

(f) **Virginia Residents**

Virginia residents have certain rights around Sermo's collection, use, and sharing of their personal information. Sermo sells your personal information. Sermo does not engage in profiling in furtherance of decisions that produce legal or similarly significant effects. Sermo engages in "targeted advertising" as that term is defined in the Virginia Consumer Data Protection Act ("VCDPA").

Sermo collects various categories of personal information when you use our Sites or services. A more detailed description of the information Sermo collects and how we use it is provided above in "Information Collection and Use" section. The "How and Why We Share Your Information" section describes the categories of third parties with whom we share personal information, and what information may be shared under different circumstances. If you are a resident of Virginia, you have the right to:

- i. request to know what personal information has been collected about you, and to access that information;
- ii. request to correct inaccuracies in your personal information;
- iii. request deletion of your personal information, subject to exceptions;
- iv. obtain a copy of your personal information, and;



- v. opt out of selling, profiling, and targeted advertising, as defined by the VCDPA.

Also, a Virginia consumer may not be discriminated against for exercising the consumer's Virginia privacy rights. You may submit a request to exercise your rights under the VCDPA through one of the following means:

- [Contact Us](#), choosing the specific Privacy Inquiry type;
- Send us an e-mail at support@sermo.com with the subject heading "Virginia Privacy Rights";
- To opt-out of the selling or sharing of personal information, you may submit a request via our dedicated online form, or;
- a letter to us at the address listed in the "How to Contact Us."

You can learn more about how to submit a data rights request, or appeal denial of a request, by emailing support@sermo.com.

10. Changes to this Privacy Policy

We may update this Privacy Policy at any time, with or without advance notice. In the event of any material change in the way we treat Your personal information, or in the Privacy Policy document itself, we will display a notice on our Sites or send You an email, so that You may review the changed terms. As always, if You object to any of the changes to our terms, and You no longer wish to use the Site, You may contact Sermo Support at support@sermo.com to deactivate Your account. Unless stated otherwise, our current Privacy Policy applies to all information that Sermo has about You and Your account.

11. Site and Service Updates

As necessary, Sermo may send You Site and service announcement updates. You are not able to unsubscribe from service announcements, which contain important information about the Site, unless You delete Your account. Sermo primarily communicates via e-mail with You to provide requested services and to resolve issues relating to Your accounts.

12. No Use by Children

Our Sites contain business-related content and are specifically aimed at and designed for use by adults. Our Site is not intended for children under 16 years of age. We do not intentionally gather personal information about visitors who are under the age of 16. If a child has provided us with personal information, a parent or guardian of that child may contact us to have the information deleted from our records. If you believe that we might have any information from a child under age 16 in the applicable jurisdiction, please contact us at support@sermo.com. If we learn that we have inadvertently collected the personal information of a child under 16, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible.



13. Contact Us

For questions about our privacy practices, contact us:

- via our [online form](#), choosing the option 'Privacy Inquiry';
- via email, at support@sermo.com; or
- via written post directed at one of the below locations as convenient:

Sermo

Attn: Data Protection Officer
200 Park Ave South, Ste 1310
New York, NY 10003
United States

Sermo

Attn: Data Protection Officer
Fora, 42 Berners Street
London W1T 3ND
United Kingdom

We will use all reasonable efforts to respond promptly to requests, questions or concerns You may have regarding our use of Your personal information. Except where required by law, Sermo cannot ensure a response to questions or comments regarding topics unrelated to this Privacy Policy or Sermo's privacy practices.