

CTP Rx Privacy Policy

CTPRx.com recognizes how important the privacy of personal information is to our clients and their patients. CTPRx.com is committed to honoring your privacy, and to offering special protections for any personal health information you choose to share with us. The document you are reading is our Privacy Policy for our Web sites that are accessible by physicians, nurses and other healthcare professionals, and it describes what information we may collect about you, what uses we may make of it, how you can tell us what to do with your information, and what precautions we take against unauthorized access or use of your information.

About This Privacy Policy

Web Sites Covered

Reference to "CTPRx.com", "we" or "our" means RxScan, Ltd., including any company that we control. CTPRx.com Web sites include any site that we own or control (for example, DrugSample.org, or RxScan.com), unless the Web site states expressly that it is subject to a different policy. We may share information among our subsidiaries and Web sites that we own or control, but information collected through CTPRx.com is always protected under the terms of this Privacy Policy.

We have a [corporate site](#) where you can read more about our company and find out how to contact us at www.RxScan.com

This Privacy Policy applies to CTPRx.com sites. You should read the privacy policy at each Web site that you visit after you leave one of our sites. We are not responsible for how other Web sites treat your privacy, once you leave CTPRx.com Web site.

Privacy Policy Changes

As our Privacy Policy changes in significant ways, we will make specific efforts to notify you of the changes. Minor changes to the Policy may occur that will not affect our use of individually identifiable information. For these instances, CTPRx.com may not individually notify you of such minor changes, and may instead post a notice on the CTPRx.com Web site. Please check the Web site periodically to determine whether any changes have been made to this Privacy Policy. When the Privacy Policy changes in a way that significantly affects the way we handle personal health information, we will not apply the new policy to information we have previously gathered without obtaining consent from the appropriate person.

Information We Collect

Information We Collect from All Visitors

Visitors to each of our Web sites can access the Web site's home page and browse some areas of the site without registering. We do track information provided to us by your browser, including the Web site you came from, the type of browser you use, the time and date of access, and other information that does not personally identify you. On most of our Web sites, you or your company must register with us to use the entire site.

Information We Collect When You Register

Customers registering for services on our Web sites are asked to provide us with identifying information, such as name, contact information, and other personal information. You will also be given a choice about whether or not you want to receive newsletters and other information that we distribute from time to time. RxScan Web sites will explain how personally identifiable information will be used and ask for your consent before collecting it. In addition, we gather information about you that is automatically collected by our Web server, such as your IP address and domain name. We use this information to personalize our offerings and presentations to you, facilitate your movements throughout our Web sites, provide personalized services, and to communicate with you individually.

Information from Outside Sources

We may also collect information about users of our Web sites from other sources in order to verify their licensure status and identity. In some cases we may ask customers for information after they register, such as credit card information. Where necessary (for example, to process an order for a purchase), our Web sites may contact financial or credit organizations to confirm customer credit cards.

Information Uploaded When Using CTPRx.com

- **Tools:** On CTPRx.com and some of our other Web sites, we offer clinical tools that require you to provide information for the tools to operate (for example, a clinical calculator that provides information on adjusting drug dosage). Our tools may provide you with the option of storing the information that you provide on our servers. We will always make it clear to you when information you provide to us through a tool will be saved.
- **Patient Health Information:** Some of the tools on our Web sites utilize your patients' personal health information ("PHI"). We use such PHI only to provide you the services on the Web sites, or as otherwise set forth in this Privacy Policy or authorized by you. PHI you provide to us is also covered by the Business Associate Agreement between us and you or your company.

Use of Cookies

Cookies are a technology we use to keep track of users as they move through our Web sites. Your browser allows us to place some information on your computer's hard drive that is associated with the computer you are using. We may use cookies to personalize our Web sites and to track your usage across all of our Web sites.

Your Web browser can be set to allow you to control whether you will accept cookies, reject cookies, or to notify you each time a cookie is sent to you. If your browser is set to reject cookies, Web sites that are cookie-enabled will not recognize you when you return to the Web site, and some Web site functionality may be lost.

Although cookies do not normally contain personally identifiable information, if you are a registered user, we may elect to associate your registration information with cookies our Web site places on your computer's hard drive.

Uses We Make of Information

Aggregate Data

We create aggregate data about usage of our Web sites and certain of the information you upload to our sites for product development, data analysis, research and other purposes. We may provide information from our Web sites in aggregate form, with identifying information removed, to third parties. For example, we may tell a health care partner what percentage, of our registered users, are located in a particular geographical area. When aggregated health information is provided, we pool it from many individual records and strip it of any data that could be used to identify an individual before it is used. For example, we may provide information to a potential advertiser of a product that would appeal to a diabetes patient about what percentage of our users use or provide diabetes drugs. Depending on our agreement with the third parties, we may or may not charge for this information.

Marketing and Advertising

We may target our advertising or marketing depending on information we have about you. The advertiser will not have access to any individually identifiable personal information or PHI. For example, a user that we know is a healthcare professional who treats diabetes may receive advertising for new diabetes drugs.

Personalization

We may also personalize our Web site based on your interests. For example, you may see different articles in different places on our Web site based on information you have shared with us, or information we have gained by observing your previous behavior, or information we may have gained from your interactions with a third party that shares information with us.

Third Parties

In addition to aggregate information (discussed previously), we may share some kinds of information, or you may share information directly, with third parties as described below.

- **Other Companies:** We have strategic relationships with other companies who offer products and services on our Web sites. When you are interacting with those companies, different rules and privacy policies may apply. We do not control the collection or use of information you provide under those circumstances, and we encourage you to review those companies' privacy policies before sharing your information with them.
- **Companies Who Work for Us:** We contract with other companies and individuals to help us provide services. For example, we may host some of our Web sites on another company's computers or hire technical consultants to maintain our Web-based tools. In order to perform their jobs, these other companies may have limited access to some of the personal information and PHI we maintain about or for our users. We require all such companies to comply with the terms of our Privacy Policy, to limit their access to any personal information and PHI to the minimum necessary to perform their obligations, and not to use the information they may access for purposes other than fulfilling their responsibilities to us.
- **Legal Requirements:** We may release personal information or PHI when such a release is required to comply with law.
- **Consent:** We may release personal information or PHI to a third party in accordance with your appropriate consent or direction.

Protection of Information

General Policies

We have implemented technology and security policies, rules and other measures to protect the personal data that we have under our control from unauthorized access, improper use, alteration, unlawful or accidental destruction, and accidental loss. Please see our Security Policy for more details.

Storage of Health Information

PHI you share with us is stored on our database servers at our data centers or hosted by third parties who have entered into agreements with us that require them to observe our Privacy Policy and to comply with applicable law. We have a firewall to prevent unauthorized access. Data centers are physically secure and protected from unauthorized access by unauthorized persons.

Correction of Information We Have About You

If you believe that registration information collected by our Web site(s) is in error, you may edit your personal profile any time that you like. You can directly edit your user profile on our Web site on which you initially registered. Requests for deletion of your record may result in your removal from the registry, but we may keep certain demographic information about you for product improvement purposes. You may contact Customer Support and ask for the changes that you would like to make.

Privacy Questions or Concerns about One of Our Web Sites

For privacy questions or concerns about one of our Web sites, please contact privacypolicy@rxscan.com

Effective date: May 1, 2011
