

# Privacy Policy

## Specialty Networks, LLC

**Last updated: May 15, 2024**

This Privacy Policy provides information about how Specialty Networks, LLC (“Specialty Networks”) and its affiliates collect, use, share and transfer information relating to individuals (“Personal Information”), and information about your rights and choices regarding our processing of your Personal Information. Please review this document carefully, as our processing of your Personal Information is subject to this Privacy Policy. A reference to “Specialty Networks,” “we,” “us,” or “our” is a reference to Specialty Networks, LLC and any relevant affiliate involved in the Personal Information processing activity.

This Privacy Policy applies to Personal Information collected via our websites (the “Sites”) to which this Policy is linked, including <https://www.specialtynetworksllc.com>; <https://ppsanalytics.com>; [urogpo.us.com](https://urogpo.us.com); [urogpo.com](https://urogpo.com); [gastrogpo.com](https://gastrogpo.com); [gastrologix.net](https://gastrologix.net) and <https://unitedrheumatology.com>.

### Information We Collect

#### *Information provided by you*

You provide your Personal Information when you register on our websites or otherwise provide Personal Information while accessing mobile applications and other websites that we control that include a direct link to this Privacy Policy (the “Sites”). You also provide Personal Information when you request customer support, or sign up for or attend a Specialty Networks or vendor event, webinar, contest or promotion. You may otherwise provide us with or make available your Personal Information through other registration and data capturing processes, including other public sources of such data.

The categories of Personal Information we collect from you may include your contact information (such as your name, address, telephone number, email address, username and password), information to comply with transparency reporting requirements, and where relevant to fulfill a transaction or request, additional information such as shipping addresses, end-user information, and credit card information. Additionally, in order to tailor our communications to you, we may ask you to voluntarily provide us with information regarding your professional areas of interest, experience with our products and services, contact preferences, and other information relating to your interactions with us or our products and services.

When you visit the Sites or interact with us in other ways, you can refuse to supply Personal Information. However, this may prevent you from engaging in certain Site-related or other activities. By interacting with the Sites or otherwise providing your Personal Information, you agree that we may collect, use, share and/or transfer that information in accordance with the terms and conditions of this Privacy Policy, subject to your rights and our obligations under applicable law.

#### *Information from Cookies, Website Use & Navigation Data*

To make the Sites work properly, we sometimes place small data files called cookies on your device. These cookies are used to save your preferences and improve your site experience. Many other websites do this too.

We use cookies, web beacons, tracking pixels, and other technologies to collect information when you use and navigate the Sites, as well as interact with emails from us. A cookie is a text file that may be stored on your computer's hard drive when you visit certain websites. With cookies in place, our system will recognize you whenever you use your web browser to connect to our page. Tracking pixels are transparent graphic images, sometimes called web beacons or tracking beacons, that are placed on a web page or in an email to indicate that the page or email has been viewed. Pixels collect information about your browser or device and can also set cookies.

We collect information when you use and navigate the Sites or interact with our emails, such as the URL of the site you came from, the browser software you use, your Internet Protocol (IP) address, IP ports, date/time of access, data transferred, pages visited, amount of time you spend on the Sites, information about transactions conducted on the Sites, and other "clickstream" data. This data is generated and collected automatically, as part of the standard operation of the Sites.

Our Sites use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics may collect information about your use of the Sites, including your IP address. Google uses cookies to provide information about visits to our Sites, including number of visitors, the websites from which visitors have navigated to our Sites, and the pages on our Sites to which visitors navigate. More information on Google Analytics can be found at the following link: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/)

Specialty Networks also may contract with third party advertising networks that collect IP addresses and other information from pixel tags or web beacons on our Sites, in our emails, and on third party websites. These networks use cookies and other device and usage data in order to recognize individuals who have previously visited a particular website. This information is used to measure advertising effectiveness and provide advertisements about our products or services tailored to your interests.

Our Sites may use social media platform features, such as LinkedIn and the Facebook "like" button, the "Tweet" button and other sharing widgets. These features, which are either hosted by the respective social media network or hosted directly on our Sites, allow you to post information to your third-party social media profile page and share it with others in your network. When you click through social media features from particular websites (including our Sites), the social media network may receive information showing the websites you have visited. If you are logged in to your social media account, the social media network can link your visit to our Sites and other websites with your social media profile, and may deliver advertisements or promotions about our products or services tailored to your interests. Your interactions with social media features are governed by the privacy policies of the companies providing these features.

If you access the Sites using a mobile device, the device ID or IP address may be recorded and used for purposes similar to those of cookies.

Disabling cookies and other tracking technologies may prevent you from using certain features of the Sites.

## **Use of Information**

This section describes the ways in which Specialty Networks uses the Personal Information we collect. Please note that there may be other uses, which we would describe to you when we collect the information.

### ***To contract with you***

Specialty Networks uses your information to perform contracts with you (or to fulfill your contract with or placed through a third party) for the delivery of products or services, for the use of our Sites under applicable Specialty Networks Terms of Use, and for other purposes. If you order services or event registrations through our Sites, we may contact you by email to provide information about your order (e.g., order confirmations, shipment notifications, etc.). If you have an account with Specialty Networks, we may also send you email regarding your account or registration status or changes to relevant agreements or policies.

### ***Our legitimate business interests***

Where we have not entered into a contract with you, we process your Personal Information for legitimate interests, including to better understand your needs, provide you with requested services and information, and send you information regarding products, services and benefits, which may include marketing materials. If you do not wish to receive marketing information from us, you may opt out (see “Opting Out” below). We use information passively submitted by you to personalize features and your experience of the Sites, and otherwise to generally improve the content, design, and navigation of the Sites. We also use this data to study website traffic patterns and detect and correct technical errors. As described above, Specialty Networks or our service providers use website tracking technologies to display information or features that are tailored to your interests and to present advertising on the Sites or other websites.

To the extent permitted by applicable law, we may combine the various types of data we collect. We use this combined information to update, expand, and analyze our marketing leads, identify new customers, and create more tailored advertising. We may conduct marketing analysis and similar research to assist us in making business decisions. Such analysis and research activities may be conducted through third party services, using anonymous data and aggregate statistics generated by our information collection.

### ***Consent***

We may use your Personal Information when we have your consent to do so, where required or permitted under applicable law. If we are using your Personal Information on the basis of consent, you may withdraw your consent at any time (which will not affect the lawfulness of the processing before consent was withdrawn) by emailing us at [privacy@specialtynetworks.com](mailto:privacy@specialtynetworks.com).

### ***Compliance with legal obligations***

We may use your Personal Information to comply with legal obligations or legal processes, respond to requests from government and other public authorities, and to pursue available remedies or limit damages we or other third parties may sustain.

### **Sharing/Transferring Personal Information**

In general, we may share and/or transfer your Personal Information to affiliates, agents, vendors, service providers, or professional advisors who assist us in the process of providing products or services to you, or otherwise perform functions on our behalf. Third party service providers may use Personal Information we provide to them only as instructed by Specialty Networks. We will not rent, sell or otherwise transfer your Personal Information to a third party for monetary consideration. We reserve the right to disclose Personal Information to third parties where we believe in good faith that disclosure is required to comply with our legal obligations under applicable laws, to cooperate with regulators or law enforcement authorities, to comply with a judicial proceeding or legal process, or to protect the safety, rights, or property of our customers, the public, or Specialty Networks. If we sell or transfer a business unit or asset to another company, we may share or transfer your Personal Information pursuant to the terms of the

transaction. In addition, we may disclose information about you to a third party at your request, or if you consent to the disclosure.

When you attend a conference, trade show, or event (either sponsored by Specialty Networks or one where Specialty Networks is a participating vendor) and register or have your badge scanned, your Personal Information will be shared with Specialty Networks, as well as with any partner or third party participating in that event. If you do not want your Personal Information shared with Specialty Networks or partners in this manner, do not have your badge scanned. If your badge is scanned by a partner or third party at an event your information will be governed by that party's privacy policy.

### **International Data Transfer**

Any Personal Information you provide to Specialty Networks, and that Specialty Networks shares with affiliates, agents, vendors and service providers, may be stored and processed, transferred between and accessed from the United States and other countries, which may not guarantee the same level of protection of Personal Information as the country in which you reside. However, Specialty Networks will handle Personal Information collected through a Site in accordance with the Site's linked Privacy Policy, and in compliance with applicable law.

### **Other Web Sites**

Our Sites may contain links to other websites of interest. However, once you have used these links to leave our Sites, you should note that we do not have any control over other websites. Therefore, we cannot be responsible for the protection of any information provided while visiting such websites, and such websites are not governed by this Privacy Policy. You should exercise caution and carefully review the privacy statement applicable to the website in question.

### **Security**

We use commercially reasonable administrative, physical and technical measures intended to safeguard your Personal Information and help protect it from unauthorized access or loss. Users are responsible for maintaining the confidentiality of their own passwords to access the Sites. However, no security can be 100% effective, and you should not expect that your information will remain private under all circumstances. If you have reason to believe that the security of your Personal Information has been compromised, please immediately notify us by contacting us at [privacy@specialtynetworks.com](mailto:privacy@specialtynetworks.com).

### **Opting Out**

If you do not wish to receive marketing information from us, you may opt out by: (1) declining marketing information when registering or at other information gathering points on the Sites, or (2) informing us that you no longer wish to receive marketing communications by emailing us at [privacy@specialtynetworks.com](mailto:privacy@specialtynetworks.com). We will comply with these requests unless such communications are required by law or contract or do not require your consent under applicable laws. If you would like to opt-out of receiving communications from affiliates or other third parties with whom we shared data in accordance with this Privacy Policy, please contact such affiliates and third parties directly.

### **Children's Privacy**

We do not knowingly collect Personal Information from children under the age of 18. By accessing our Sites or initiating any communication with us, you represent that you are at least 18 years old.

## **Data Retention and Access**

We retain data for at least as long as required by applicable law, and for periods of time needed for Specialty Networks to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes, and enforce our agreements. You may access, correct, and/or update your information by accessing your accounts or profiles, where relevant, on the Sites. You may request a summary of information we hold about you, as well as corrections, updates or deletion of your information where required or provided for under applicable law, by contacting us at [privacy@specialtynetworks.com](mailto:privacy@specialtynetworks.com). Our response to such requests will be limited to information under our direct control. We will make reasonable efforts to respond promptly to such requests in accordance with applicable laws.

## **Location-Specific Policies**

### ***For residents of California, USA:***

This section applies to residents of California, USA (“you” or “your”), and describes how we collect, use and share information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked to a consumer or device (“Personal Information”).

For purposes of this Statement, Personal Information has the meaning given in the California Consumer Privacy Act of 2018, as amended (“CCPA”) and similar personal data privacy laws in other US states (“US Data Privacy Laws”), but does not include information exempted from the scope of such US Data Privacy Laws. This section does not apply to Personal Information relating to our employees, job applicants, and contractors, who will receive a separate privacy notice from us where required by law.

### ***Personal Information collected from California residents***

We collect the following categories of Personal Information: identifiers such as name, address, IP address, and other similar identifiers; Personal Information described in subdivision (e) of Section 1798.80 (California customer records statute) such as a name, address, telephone number, credit card number; commercial information such as products or services purchased; internet/electronic activity such as browsing history and search history; professional-related information such as job title and expertise; geolocation data including geographic coordinates/physical location; and audio, video, electronic or other similar information. We have disclosed these categories of Personal Information for a business purpose within the last 12 months (see “Sharing/Transferring Personal Information” above for information about the categories of third parties with which Personal Information is shared, and “Use of Information” for information about the business purposes for which Personal Information is collected and used). We do not sell or share, and within the last 12 months have not sold or shared (as those terms are defined by applicable US Data Privacy Laws), Personal Information to third parties. We obtain the Personal Information collected from the following categories of sources: directly from you or your agent; directly and indirectly from the Sites; from affiliates or third parties that interact with us; and/or from publicly available information. We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice and/or obtaining your consent where required by law.

See the section entitled “Data Retention and Access” above for a description of the criteria used to determine how long we retain Personal Information. We do not use or disclose sensitive Personal Information (as defined in US Data Privacy Laws) for purposes other than those specified in CCPA Regulations Section 7202(m).

## *Rights of California residents*

Where provided for under applicable law, you are entitled to certain rights relating to your Personal Information subject to certain exceptions, including the following:

1. You have the right to a **copy** of your Personal Information in our possession, or to request information about the categories of Personal Information we have collected about you, the categories of sources from which we collected the Personal Information, the purposes for collecting, sharing or selling the Personal Information (where applicable), the categories of third parties with whom we have shared or sold your Personal Information and the purpose for which we shared or sold your Personal Information (where applicable), and information about the specific pieces of Personal Information we have collected about you.
2. You have the right to request that we **correct** in our records any Personal Information about you that is inaccurate.
3. You have the right to request the **deletion** of Personal Information that we collected about you and retained, subject to certain exceptions.
4. You have the right to **opt out of the sale or sharing** of your Personal Information with third parties for targeted advertising purposes, where such a “sale” or “sharing” is occurring (as such terms are defined by applicable law).
5. You have the right to **limit the use or disclosure** of your **sensitive** Personal Information, where collected and as permitted under applicable law.

You can exercise these rights up to twice within a 12 month period. To do so, contact us at [privacy@specialtynetworks.com](mailto:privacy@specialtynetworks.com). For your protection, when you seek to exercise the rights described above, it will be necessary for us to verify your identity or authority to make the request and confirm that the Personal Information relates to you. We will verify your identity by asking you to provide identifying information that we will match to information in our records. Only you or a person that you authorize in writing to act on your behalf may make a verifiable consumer request related to your Personal Information. You (or your authorized agent) must provide documentation signed by you demonstrating that the agent is authorized to submit a verifiable consumer request on your behalf.

We will endeavor to respond to a verifiable consumer request in the timeframe prescribed by applicable US Data Privacy Laws, typically within 45 days of receipt. Please note that your right to deletion of Personal Information is subject to certain exceptions by law. If you submit a request for deletion and we retain any Personal Information under one or more of these exceptions, we will explain this to you in our response. In accordance with your rights under US Data Privacy Laws, we will not discriminate against you for exercising your privacy rights. We do not charge a different price or rate or provide a different level of product or service quality based on you exercising your privacy rights.

In US states other than California (and other jurisdictions) with similar data privacy regulations, we may collect from you the categories of Personal Information described above. We collect and manage (including disclose) such data in compliance with applicable local laws and regulations. As noted, we do not sell your Personal Information to third parties nor do we use it for automated decision making or profiling.

## **Changes to Privacy Policy**

We reserve the right to change this Privacy Policy from time to time and in our sole discretion. Changes will be effective upon the date the revised Privacy Policy is posted on our Sites, with the effective date noted in the Policy header at the top of this page. When you visit the Sites, you accept the version of this Privacy Policy in effect at that time. We recommend that you periodically revisit and review this page to obtain the latest information on our privacy practices.

## **Contact Information**

If you have any questions, concerns or complaints about this Privacy Policy or privacy-related practices, please contact Specialty Networks via email at [privacy@specialtynetworks.com](mailto:privacy@specialtynetworks.com), or via U.S. mail at:

Specialty Networks, LLC  
Attn: Privacy Officer  
600 Superior Avenue East, Suite 1500  
Cleveland, OH 44114 USA