



## S E R V I C E S   P R I V A C Y   P O L I C Y

**June 2011**

Medicx Media Solutions (Medicx or “We”) helps its business customers provide more relevant online and offline consumer advertising. Our business customers include online advertising networks (companies that work with advertisers to provide advertising across a collection of unrelated websites), online data exchanges, website publishers, advertisers, and their agencies (“Clients”). This privacy policy applies to the practices surrounding our services we provide for our Clients.

The process we have designed for our online and offline data services is consumer friendly and does not involve Medicx’s collection, use, storage, or sharing of any personally identifiable health or other personal consumer information. We instead use only data that has been previously de-identified and we aggregate that de-identified data into geographic-based profiles. The data we use to provide our services is collected from health insurance claims that our data suppliers have certified as de-identified and in compliance with the stringent regulations governing the de-identification process under the Health Insurance Portability and Accountability Act (HIPAA).

Medicx is committed to protecting the privacy of consumers. Medicx works with its data suppliers to ensure that it handles data consistent with the privacy guidelines developed by the Direct Marketing Association (DMA) Privacy Promise, the Online Privacy Alliance, the E-mail Service Provider Consortium, the Interactive Advertising Bureau (IAB), and the Network Advertising Initiative (NAI). Medicx also requires its data suppliers to comply with HIPAA. This policy explains our services and information collection practices and details the measures we have taken to protect consumers’ privacy and to ensure the integrity, security, and confidentiality of the information entrusted to us.

### **We Take Privacy Seriously**

The security of patient and consumer information is of paramount concern to Medicx. Under the HIPAA regulations, there is a mechanism by which data can be legally recognized as de-identified after being examined by a third-party expert statistician. We require that all of the patient data that Medicx receives and incorporates into its databases have been previously certified as de-identified by expert statisticians in compliance with this regulation. Medicx takes precautions designed to ensure that at no point does Medicx use, store, or accept any personal health information or personally identifiable data from any of our data sources.

## What Information Do We Collect and How Do We Use It?

### De-Identified Data

Medicx does not collect any data directly from consumers. Further, Medicx requires that our data suppliers provide us with only de-identified data – no personal health information or personally identifiable data. All of the data that Medicx uses to serve its online and offline advertising customers is received by Medicx as aggregated and de-identified data. Medicx receives data from different sources.

### Source 1:

The first source of data Medicx receives is data from random health insurance claims that have been aggregated and de-identified. Our suppliers promise that this data is certified as de-identified for the purposes of HIPAA by statisticians

### Source 2:

The second source of data that Medicx receives is aggregated data that describes the demographics, usage, or characteristics of consumers who have agreed to take surveys on a variety of health topics.

These surveys are conducted by our partner Survey Providers. The participant responses to the health and wellness surveys have been anonymized for Medicx use. Our Survey Partners maintain all direct relationships with consumers. Please consult the privacy policies of our Survey Partners for more information on their privacy practices or you can write to Medicx Media Solutions and we will provide the mailing address for our Survey Partners.

### How Do We Use the Data?

Medicx merges these sources and other anonymous and aggregate demographic data to derive mathematically modeled aggregate audience data (“Medicx Aggregate Data”), which is used to predict the prevalence of a medical condition or a treatment, usage patterns, and insurance coverage of an audience as a group within a specific Zip+4 geographic area. No personally identifiable information is included in this data when it is obtained, modeled or shared with our clients.

The aggregate Zip+4 audience information may be provided or sold to third parties wishing to tailor advertising to specific consumer segments. Additional data may be merged with the aggregate data Medicx receives to enable an analysis of advertising effectiveness, which is reported to advertisers on an aggregate, de-identified basis.

### Disclosure of Information to Third Parties

Medicx shares the Medicx Aggregate Data it collects with our Clients, for online and offline advertising. This may include advertising networks, website publishers, retail, pharmaceutical, consumer packaged goods, and health insurance companies. Medicx provides this information to its clients and service providers in a variety of formats – none of which include any personally identifiable information of consumers. Our Clients represent that they handle the information we provide, including any merging of data they might perform, in compliance with their customer privacy policies, and our service providers are obligated to handle the information we provide confidentially.

## Opting Out

Medicx Media Solutions encourages all of our online partners and clients to participate and conform to the self-regulating practices under the FTC guidelines and through participation and conformance to principles and standards of organizations such as the Network Advertising Initiative (NAI), Direct Marketing Association (DMA), and/or Interactive Advertising Bureau (IAB), which enables consumers to opt-out through links and cookies within their technology platforms. If a consumer wants their browser not to store anonymous information that one of our partners may use for serving advertisements, a simple procedure allows the consumer to opt-out. In order to opt-out of cookies, visitors can manually delete cookies by following the instructions contained in the “help” section of their browser. They can also visit the websites of our partners for additional opt-out information and the following industry trade groups:

[www.networkadvertising.org](http://www.networkadvertising.org)

[www.iab.net](http://www.iab.net)

[www.the-dma.org](http://www.the-dma.org)

## Data Security

To prevent unauthorized access, maintain data accuracy, and ensure proper use of our databases, Medicx employs appropriate physical, electronic, and managerial procedures to safeguard and secure the information contained in our databases, consistent with industry practices.

## Corporate Change of Control or Sale of Assets

If we sell all or part of our business or make a sale or transfer of assets or are otherwise involved in a merger or business transaction, we may transfer our aggregate data to a third party as part of that transaction as long as the acquirer agrees to comply with this privacy policy or has a substantially similar privacy policy.

## Changes to This Privacy Policy

Medicx reserves the right to modify, alter, or otherwise update this privacy policy at any time, and you agree to be bound by such modifications, alterations, or updates. If we make material changes to our privacy policy, we will post the revised policy along with the date it was revised on this page. Your continued use of our services or website constitutes your agreement to this privacy policy and any updates. We encourage you to periodically review this privacy policy to stay informed about how we are protecting the information we collect.

## Our Website Privacy Policy

Please see our website privacy policy for policies related to our website at [www.medicxmedia.com](http://www.medicxmedia.com).

## **Contacting Medicx Media Solutions**

If you have any questions about this privacy policy, the practices of Medicx, this website, or your dealings with this website, please contact us at:

E-mail: [info@medicxmedia.com](mailto:info@medicxmedia.com)

Mail: Medicx Media Solutions

Attention: Privacy Manager

9364 East Raintree Drive, Suite 101

Scottsdale, AZ 85260

Phone: (480) 614 0060