

Website Privacy & Cookie Notice

INTRODUCTION

Wolters Kluwer ("we" or "us") wants to inform you about the ways we process your personal information. In this Privacy & Cookie Notice we explain what personal information we collect, use and disclose.

Personal information means any data relating to an individual who can be identified, directly or indirectly, based on that information. This may include information such as names, contact details, (online) identification data, online identifiers, or other characteristics specific to that individual.

This Privacy & Cookie Notice applies when you visit our websites, solutions and other services, including events, that refer or display a link to this notice ("Services"). This Privacy & Cookie Notice may be supplemented or replaced by additional privacy statements or terms provided to you.

WHO WE ARE

Wolters Kluwer is a global organization consisting of many companies worldwide. Any personal information provided to or collected by Wolters Kluwer is controlled by Wolters Kluwer N.V., P.O. Box 1030, 2400 BA, Alphen aan den Rijn, The Netherlands or one of its affiliates or subsidiaries.

We are committed to safeguarding the personal information of our customers, users, employees and other stakeholders, while helping our customers, employees, investors, and society create a deeper impact and make the right decisions.

If you wish to contact us in relation to questions to your personal information we refer you to the ['HOW YOU CAN CONTACT US'](#) section below.

WHAT PERSONAL INFORMATION DO WE COLLECT?

The type of personal information we collect depends on your relationship with us and the Services we deliver to you. To that end, we may collect the following personal information about you:

- **Name and contact details**, such as, first and last name, email address, postal address, telephone number
- **Work-related information**, such as, job title and other employment or education information
- **Account Credentials**, such as, passwords and other security information for authentication and access
- **Financial Information**, such as, bank account, credit and debit card numbers for processing of payments
- **Usage information**, such as, behavioral information about how you navigate within our Services and which elements of our Services you use the most and information regarding the goods and/or services you wish to order, wish list, preferences, interest, etc. Other information shared by you through our websites, apps, web shops and other products.

- **Computer, device and connection information**, such as, IP address, browser type and version and location.

If you are under 13 years of age, please do not use or access the Services. Wolters Kluwer does not knowingly collect or maintain personal information (as defined by the United States Children's Online Privacy Protection Act) from persons under 13 years of age. If Wolters Kluwer learns that personal information of persons under 13 has been collected on or through the Services, we will take appropriate steps to delete this information.

HOW WE COLLECT PERSONAL INFORMATION

We and our third-party service providers may collect personal information from the following sources:

- **Direct Interactions**, such as, when you register for our Services or make a purchase
- **Data from Third Parties**, such as, information on third-party websites or other information you may have made publicly available or information provided by third party sources, including but not limited to government entities and data resellers
- **Automated Tracking Technologies**, such as, information automatically collected about your interaction with our Services and websites using various technologies such as cookies, web logs and beacons and internet tags

HOW WE USE YOUR PERSONAL INFORMATION

Personal information collected is used for the purposes for which you have provided it and might be further used for statutory or other legitimate purposes only. As an example, if you make use of our service contact form on our website, we will use the information you provided in the first place to respond to your service request. We might further use that information to improve the quality of our customer service process.

Lawfulness of the processing is one of the main principles relating to processing of your personal information - we apply the following legal processing grounds:

- processing is necessary for the performance of a contract or in order to take steps prior to entering into a contract;
- processing is necessary for the purposes of our legitimate interests - for example, to improve the quality of our products and services;
- processing is necessary for compliance with a legal obligation to which we are subject or that is otherwise lawful under applicable data protection laws;
- with your given consent.

Depending on how you interact with us and the Service, we may use your personal information for the following purposes:

- **Administering our relationship with you and our business**, such as providing and managing your access to and use of our Services. This processing is necessary for the performance of a contract;
- **Improving our Services and developing new products**, such as inviting you to participate in surveys or to personalize your experience with our Services. This processing is necessary for the purposes of our legitimate interests;

- **Marketing**, such as providing you with marketing or advertising communications that we think you may be interested in. This processing is with your given consent or for our legitimate interests;
- **Recruiting**, such as assessing job applicants. This processing is in order to take steps prior to entering into a contract or with your given consent;
- **Providing online communities**, such as making chat rooms, forums, message boards, or news groups available to you. This processing is necessary for the performance of a contract or our legitimate interests. Please remember that any information disclosed in these forums is public. We encourage you to exercise caution when disclosing personal information in these forums, as this information is made available to other users. Do not disclose information in these public forums that might be considered confidential or proprietary or that you do not wish to be publicly available or that you are prohibited from disclosing.
- **Other general business support purposes**, including but not limited to, procurement, financial and fiscal management, risk and compliance management, and external reporting. This processing is necessary for compliance with a legal obligation to which we are subject or that is otherwise lawful under applicable data protection laws or for our legitimate interests.

SHARING YOUR PERSONAL INFORMATION

To be able to provide you the best possible Services and further our business operations, we may share certain information internally or with selected third parties. There might also be a certain statutory or legal obligation that we believe in good faith requires us to disclose your personal information externally. Parties we might share data with include:

- **other Wolters Kluwer affiliates or subsidiaries**, e.g. for providing underpinning technology to support the Services we are delivering;
- **our service providers**, e.g. for managing or hosting services and/or underpinning technology for the Services we are providing;
- **our business partners**, to the extent you have purchased or expressed interest in, a product or service of such business partner, interacted with them or otherwise authorized the sharing of your personal information with such business partner;
- **subscribing, accrediting or professional organizations**, e.g. for providing utilization information to organizations that provide you with access to our Services and/or sharing tracking and redeeming credits for professional accreditation;
- **organizations involved in business transfers**, e.g. to a purchaser or successor entity in the event of a sale or any other corporate transaction involving some or all of our business;
- **other parties**, e.g. as needed for external audit, compliance, risk management, corporate development and/or corporate governance related matters; or
- **governmental authorities and regulators**, as required under applicable law.

Whenever we share personal information internally or with third parties in other countries, we have appropriate safeguards in place in accordance with applicable data protection laws including as applicable the EU Model clauses. As required under applicable law, third parties are required to use appropriate safeguards to protect personal information and they can only access personal information that is necessary for performing their specific tasks.

FOR HOW LONG WE KEEP YOUR PERSONAL INFORMATION

Your personal information will be processed to the extent necessary for the performance of our obligations, and for the time necessary to achieve the purposes for which the information is collected, in accordance with our data retention policies and applicable data protection laws. When we no longer need your personal information, we will take all reasonable steps to remove it from our systems and records or take steps to properly anonymize it so that you can no longer be identified from it.

HOW WE PROTECT YOUR PERSONAL INFORMATION

We have put in place an internal framework of policies and minimum standards across all our businesses to keep your data safe. In addition, we limit access to personal information by our employees, business partners, service providers and third-party service providers to a 'need-to-know' basis. More specifically and in accordance with the law, we take appropriate technical and organizational measures (policies and procedures, IT security, and others) to ensure the confidentiality and integrity of your personal information and the way it is processed.

WHAT ARE YOUR RIGHTS

We will honor your rights under applicable laws. To the extent provided under your local data protection laws, including European data protection laws, your rights include the following:

- **Right of access ('an overview of your personal information')**: the right to get an overview of your personal information that we process.
- **Right to rectification ('correct your personal information')**: if your personal information is inaccurate or incomplete, the right to ask us to rectify or complete your personal information.
- **Right to erasure ('right to be forgotten')**: the right to request that we delete your personal information to the extent permitted by applicable law. In certain circumstances, it may not be possible for us to accept your request, for example, when the processing is necessary to comply with a legal obligation, or if processing is necessary for the performance of a contract. In some cases, your personal information is necessary in order to provide the Services and if you do not provide such information to us then you may be precluded from accessing and using the Services or using certain Services features.
- **Right to data portability ('transfer your personal information')**: the right to ask us to transfer your personal information directly to you. This applies to certain personal information if processed by automated means and with your consent or based on a contract you have with us. On your request, and where technically feasible, we will transfer your personal information to another party of your choice.
- **Right to restrict processing**: the right to request that we restrict or stop the processing of your personal information held by us for a certain period of time, or for an indefinite period. In certain circumstances, it may not be possible for us to accept your request, for example, when the processing is necessary to comply with a legal obligation, or if we can demonstrate compelling legitimate grounds otherwise.
- **Right to object**: the right to object to the processing of your personal information. The reasons for objection should relate to your particular situation, and be related to a processing based on the legitimate interest condition. We will then no longer process the personal

information, unless we can demonstrate compelling reasons otherwise. In certain circumstances you have the unconditional right to object; for instance, in the context of direct marketing activities.

- **Withdrawal of Consent:** the right to withdraw your consent to the processing of your personal information at any time; for instance, after you consented to keeping you informed about our Services, you have the right to withdraw this consent at any time.

To exercise your rights and/or for any other questions about the handling of your personal information, we refer you to the 'HOW YOU CAN CONTACT US' section below.

If you feel we are unresponsive or disagree with our data privacy practices, you can also file a complaint with your national Data Protection Authority.

THE USE OF COOKIES

We use cookies to optimize our websites and analyze website traffic. On occasion, we may use third party cookies, notably social media plugins, to enable you to share ideas and information related to us instantly and for own marketing purposes.

Cookies or similar techniques (referred to collectively as “Cookies”) are small text files or pixels, which might be stored on your computer or mobile device. Cookies may be necessary to facilitate website browsing and making it more user-friendly. Third party Cookies may collect information to analyze personal browsing behavior.

We may use Cookies belonging to one of the four categories listed below.

- **Necessary Cookies** - these mandatory Cookies are needed for our websites to function properly.
- **Functional Cookies** - these Cookies add additional functionality to our websites.
- **Performance Cookies** - these Cookies support analytic services that help us to improve our website's functionality and user experience.
- **Interest Cookies** - these Cookies can be applied to collect insights to issue personalized content and advertising on our and other websites.

If you do not want cookies to be stored, then you may turn off certain cookies described above individually or you can select the appropriate options on your web browser to delete some or all cookies. Please note, however, that if you block some or all cookies (including essential cookies) you may not be able to use or access all or parts of our websites, such as being able to log on to member-specific areas.

LINKS TO OTHER WEBSITES

Our websites may contain links to other Wolters Kluwer or third-party websites, which may have privacy notices that differ from ours. We are not responsible for the collection, processing or disclosure of personal information collected through other websites.

We are also not responsible for any information or content contained on such websites. Links to other websites are provided solely for convenience. Your usage and browsing on any such website is subject to that website's own policies. Please review the privacy notices posted on other websites that you may access through our website.

Wolters Kluwer may provide you with additional or different privacy notices in specific instances on how your personal information is collected and used for a specific Service.

ADDITIONAL INFORMATION FOR CALIFORNIA RESIDENTS

In addition to the information provided in this privacy policy, additional information for California residents can be found [here](#).

HOW YOU CAN CONTACT US

If you have any questions about how we process your personal information or if you want to exercise one of your rights, you can contact us at: healthlrp_privacy@wolterskluwer.com or Toll-Free 1.800.638.3030.

If you feel we are unresponsive or disagree with our data privacy practices, you can also file a complaint with your national Data Protection Authority.

In response to a request, we might ask you to verify your identity if needed, and to provide information that helps us to understand your request better. If we do not grant your request, whether in whole or in part, we will explain why.

UPDATES TO THIS NOTICE

From time to time we may update this Privacy & Cookie Notice or any other specific privacy statement. When making changes to this Privacy & Cookie Notice, we will add a new date to this Privacy Statement. This version is effective per November 6, 2020.