

Effective Date: 5/31/2024

## Overview

This Privacy Policy (“**Policy**”) is provided by Forefront Management LLC, its affiliates, and subsidiaries (collectively referred to herein as “**Forefront**,” “**us**,” “**we**,” or “**our**”), to explain what Personal Information we collect, why we collect it, how we use and disclose it, and the rights you have relating to your Personal Information, including [rights you may have under the California Consumer Privacy Act \(the “CCPA”\)](#) and other applicable laws. This Policy applies to information we may collect from you or that you may provide when you visit our websites (each, a “Site”) or use our services (together with the Sites, the “**Services**”), and to other information we may collect online or offline.

**Please read this Policy carefully before using our Services. If you do not agree with this Policy, please do not use our Services. By using our Services, you agree to this Policy.**

This Policy does not cover our use, collection, or disclosure of your protected health information under the Health Insurance Portability and Accountability Act (“**HIPAA**”). For information on how Forefront may use and disclose your protected health information and how you can get access to such information, please see [Forefront’s Notice of Privacy Practices](#).

This Policy also does not cover Personal Information that may be collected about you as an applicant for a job at Forefront or as part of Forefront’s workforce personnel. If you are a California resident and you interact with us in either context, please visit our [Privacy Notice for California Job Applicants](#) or request a copy of our Privacy Notice for California Personnel from our Human Resources Manager.

As used in this Policy, “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a consumer or

household. Personal Information does not include information that is publicly available, de-identified, or aggregated, or certain additional categories of information subject to other laws and regulations.

Unless otherwise noted, this Policy applies to our activities in the twelve (12) months preceding the Effective Date, as well as our current practices.

***Personal Information Collected and Purposes for Collection***

Generally, we may collect the following categories of Personal Information, which we use for the business or commercial purposes shown. We may collect several types of Personal Information from those who interact with us, depending on the context of the interaction.

Category of Personal Information	Purposes for Collection
<p><b>Identifiers and personal records,</b> including name, address, telephone number, online identifier, IP address, email address, social media account, or other similar identifiers. <i>This category includes information described in Cal. Civ. Code § 1798.80(e).</i></p>	<p>To process your transactions or otherwise provide our Services to you</p> <p>To communicate with you</p> <p>To respond to your inquiries and provide customer service</p> <p>To facilitate and personalize your user experience</p> <p>To prevent fraud and for security purposes</p> <p>To deliver promotional or advertising content to you</p> <p>To better understand how users access and use our Services, to improve the Services, to respond to</p>

	<p>user preferences, auditing, and for other research and analysis</p> <p>To comply with applicable laws and regulations</p>
<p><b>Characteristics of protected classifications</b> under California or federal law, including date of birth, age, and gender.</p>	<p>To process your transactions or otherwise provide our Services to you</p> <p>To communicate with you</p> <p>To respond to your inquiries and provide customer service</p> <p>To facilitate and personalize your user experience</p> <p>To prevent fraud and for security purposes</p> <p>To deliver promotional or advertising content to you</p> <p>To better understand how users access and use our Services, to improve the Services, to respond to user preferences, auditing, and for other research and analysis</p> <p>To comply with applicable laws and regulations</p>
<p><b>Professional or employment-related information</b></p>	<p>To evaluate your practice for partnership opportunities.</p>

<p><b>Commercial information</b>, including records of products or Services purchased, considered, or other consuming histories or tendencies.</p>	<p>To process your transactions or otherwise provide our Services to you</p> <p>To communicate with you</p> <p>To respond to your inquiries and provide customer service</p> <p>To facilitate and personalize your user experience</p> <p>To prevent fraud and for security purposes</p> <p>To deliver promotional or advertising content to you</p> <p>To better understand how users access and use our Services, to improve the Services, to respond to user preferences, auditing, and for other research and analysis</p> <p>To comply with applicable laws and regulations</p>
<p><b>Internet or other electronic network activity information</b>, including browsing history, search history, and information regarding your interactions with our Services.</p>	<p>To process your transactions or otherwise provide our Services to you</p> <p>To communicate with you</p> <p>To respond to your inquiries and provide customer service</p>

	<p>To facilitate and personalize your user experience</p> <p>To prevent fraud and for security purposes</p> <p>To deliver promotional or advertising content to you</p> <p>To better understand how users access and use our Services, to improve the Services, to respond to user preferences, auditing, and for other research and analysis</p> <p>To comply with applicable laws and regulations</p>
<p><b>Geolocation data</b>, including geographic location, e.g., as inferred from your device IP address.</p>	<p>To process your transactions or otherwise provide our Services to you</p> <p>To better understand how users access and use our Services, to improve Services, to respond to user preferences, auditing, and for other research and analysis</p>
<p><b>Audio, electronic, visual, thermal, olfactory, or similar information</b>, including audio recordings of customer care calls, video, or similar information.</p>	<p>To provide you with customer service</p> <p>To improve our products and Services</p> <p>To prevent fraud and for security purposes</p>

<p><b>Inferences</b>, including preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes based on other Personal Information collected.</p>	<p>To provide you with appropriate products and recommendations</p> <p>To improve our Services, and our products, marketing, and advertising</p> <p>To provide you with a better website and/or app experience</p> <p>Auditing, research, and analysis, to maintain and improve our Services, and for any other internal business purposes</p> <p>To detect and prevent fraud against you and/or us</p>
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In addition to the purposes described above, we may use and disclose any category of Personal Information we collect to respond to law enforcement requests, or as otherwise required or authorized by applicable law, court order, or governmental regulations; to protect our rights and interests and those of others; to resolve any disputes; to enforce our policies; and to evaluate or conduct a merger, sale, or other acquisition of some or all of our assets. We also reserve the right to use Personal Information we collect for any other purpose identified in an applicable privacy notice, or other agreement between you and us, or otherwise with your consent.

### ***Sources of Personal Information***

We may collect the categories of Personal Information described above from the following categories of sources:

- **Directly from you.** For example, if you submit information through a webform or during a customer service interaction.

- **Created by us.** For example, inferences about you.
- **Automatically.** For example, we may collect usage data and analytics when you use our Services.
- **From vendors that help us run our business.** For example, our information technology vendors, advertising providers, and other vendors may collect on our behalf.
- **From other sources.** For example, from clients, educational institutions, professional organizations, and other parties that may provide us with information.

### ***Disclosures of Personal Information***

We may disclose each of the categories of Personal Information we collect to our service providers and contractors for the following business purposes:

- To process your transactions or requests for products or Services.
- To provide Services (including processing, maintaining, or collecting Personal Information) on our behalf (e.g., fulfilling orders, processing payments, supporting our promotions, providing communications, technical, analytical, web hosting, cloud hosting and application support, or other services on our behalf).
- Auditing related to ad impressions.
- To ensure security and integrity of Personal Information.
- To debug or identify and repair errors that impair existing intended functionality.
- For short-term, transient use, including, but not limited to, non-personalized advertising.
- To provide advertising and marketing services.
- To undertake activities to verify or maintain the quality or safety of our Services.
- To comply with applicable laws and regulations.
- To detect or protect against malicious, deceptive, fraudulent, or illegal activity.

### ***How Long We Retain Personal Information***

We retain the categories of Personal Information described above for as long as necessary or permitted for the purposes described in this Policy or otherwise authorized by law. This generally means retaining the information for as long as one of the following apply:

- The Personal Information is reasonably necessary to manage operations, to manage your relationship with us, or to satisfy another purpose for which we collected the Personal Information;
- The Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was collected;
- The Personal Information is reasonably necessary to protect or defend our rights or property; or
- We are otherwise required or permitted to keep Personal Information by applicable laws or regulations.

Where Personal Information is used for more than one purpose, we will retain it until the purpose with the latest period expires.

### ***Cookies and Tracking Technologies***

We may use first-party and third-party cookies and other tracking technologies, including web beacons and pixels, to collect and store information about your interactions with our Sites. This type of usage information may include the browser you are using, your IP address or other unique identifier, search terms, pages that you visit, click/touch, movement, scroll, and keystroke activity, and the time of the visit (collectively, “Website User Data”).

Cookies are small data files stored by your web browser on your device that enable a website or a third-party’s systems to recognize the device to capture and remember certain information about the device. Most web browsers accept cookies by default, but you may be able to adjust your browser settings to remove or reject cookies. Please note that blocking or



disabling cookies may affect certain functionality on the Site or invalidate opt outs that use cookies to recognize devices that have opted out.

We may use third-party technology tools in connection with your activity on certain pages of the Site. These permit us to control how Website User Data is collected by online tracking technologies. They also allow us to limit how certain types of Website User Data, such as details about your activity on our Site, may be transmitted to other parties. We use these tools to limit the disclosure of personal information to third parties via tracking technologies.

We or other parties may collect personal information about your online activities over time and across different devices and online properties when you use certain pages on the Site. Please note our Sites are not designed to respond to “Do Not Track” signals received from browsers. We may use Google Analytics on certain pages, such as on our Careers page, to understand details about your use of such pages. For more information on how Google Analytics uses data it collects, visit:

[policies.google.com/technologies/partner-sites](https://policies.google.com/technologies/partner-sites). To opt out of Google Analytics, visit: [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout). To adjust your Google advertising settings, visit: [myadcenter.google.com](https://myadcenter.google.com).

### ***Third-Party Sites, Services and Accounts***

Our Services may contain links to other websites (“**Linked Sites**”). Forefront is providing these links to you only as a convenience, and the inclusion of any link does not imply endorsement by Forefront of the website or any association with its operators. Forefront does not control nor take responsibility for the content of any Linked Sites, including without limitation any link contained in a Linked Site, or any changes or updates to a Linked Site.

You may be able to connect your Forefront account to third-party accounts. By connecting your Forefront account to any third-party account, you acknowledge and agree that you are consenting to the continuous release of information about you to others (in accordance with your privacy settings on

those third-party sites). If you do not want information about you to be shared in this manner, do not use this feature.

### ***Data Security***

We implement a variety of commercially reasonable physical, technical, and administrative security measures to maintain the safety of your Personal Information from any loss, misuse, theft, unauthorized access, disclosure, destruction, or alteration. Nevertheless, the transmission of information via the Internet is not completely secure and we cannot guarantee the security of your Personal Information transmitted to or through the Services. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Services.

### ***Children Under the Age of 16***

Our Services are not intended for children under 16 years of age. We do not knowingly collect, sell, or share Personal Information from children under 16. If you are under 16, do not use or provide any information on the Services or provide any information about yourself to Forefront, including your name, address, telephone number, or email address. If we learn we have collected or received Personal Information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us using the information below.

### ***Text Messaging***

You may opt in to receiving text messages and alerts on your mobile phone. Once you opt in, we may send you text messages. If you opt in, standard text messaging charges may apply. You may choose to opt out of our text messages at any time.

### ***California Privacy Rights***

If you would like to submit a request relating to your Personal Information, please email us at [Privacy.officer@forefrontderm.com](mailto:Privacy.officer@forefrontderm.com) or call toll-free at 1-844-231-8801. When submitting your request, please identify the type of request you're making and your place of residency. If a request to know, request to delete, or request to correct is submitted, you will be asked to provide two-to-three pieces of Personal Information that will be matched against our records to verify identity. An authorized agent may be designated to make a request on your behalf; however, you will still need to verify their identity directly with us before the request can be processed. An authorized agent may submit a request on your behalf using the webform or toll-free number listed above.

***Right to Know.*** California residents have the right to obtain more details about the Personal Information collected about them, including:

The categories of Personal Information we have collected about you, including:

- The categories of sources from which the Personal Information was collected;
- The business or commercial purposes for collecting, selling, or sharing Personal Information;
- The categories of recipients to which Personal Information is disclosed;
- The categories of Personal Information that we sold or shared, and for each category identified, the categories of third parties to which we sold or shared that particular category of Personal Information;
- The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Personal Information; and

***The specific pieces of Personal Information we have collected about you.***

***Right to Opt Out of Sales and Sharing of Personal Information.*** We do not “sell” Personal Information or “share” it for cross-context behavioral advertising, as those terms are defined under the CCPA.

***Right to Delete Personal Information.*** California residents have the right to request that we delete Personal Information collected from them, subject to certain exceptions.

***Right to Correct Inaccurate Information.*** California residents have the right to request that we correct inaccurate Personal Information we maintain about them.

***Right to Limit Use and Disclosure of Sensitive Personal Information.*** We do not use or disclose Sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

***Right to Non-Discrimination for the Exercise of Privacy Rights.*** If you choose to exercise any of the privacy rights under the CCPA, you also have the right not to receive discriminatory treatment from us.

***Notice of Financial Incentive.*** Some of our practices may offer rewards program. When you sign up for one of these programs, we typically request your name and contact information. Under the CCPA these rewards programs may be considered a financial incentive. The value of your personal information to us is related to the value of the rewards or other benefits that you obtain, less the expenses related to offering those benefits to program participants. For more information, please visit the terms and conditions of such program on the website of the brand with which you are interacting.

### ***International Users***

Our Services are directed solely to residents of the U.S. If you access our Services from outside of the U.S., please be aware that Personal Information collected through the Services may be transferred to, processed, stored, and used in the U.S. Data protection laws in the U.S. may be different from those of your country of residence. Your use of the Services or provision of any Personal Information to us constitutes your consent to the transfer to and from, processing, usage, sharing, and storage of your information in the U.S. as set forth in this Policy.

### ***Modifications of Privacy Policy***

We reserve the right to modify or amend this Policy at any time. All changes will be effective immediately upon posting. Each version of our Policy will be prominently marked with an effective date. Your continued use of our Services after the effective date of this Policy (as modified from time to time) indicates your agreement to the terms hereof. If you disagree with any of the terms, please do not use our Services. Forefront will otherwise notify you of material changes to our Policy as appropriate.

### ***How to Contact Us***

If there are any questions regarding this Policy you may contact us using the information below.

Forefront Dermatology  
Attn: Marketing Department  
801 York Street  
Manitowoc, WI 54220  
[Privacy.officer@forefrontderm.com](mailto:Privacy.officer@forefrontderm.com)  
844-231-8801