

Privacy Policy

Last updated: March 15th, 2016

Johnson & Johnson Services, Inc. is concerned about privacy issues and wants you to be familiar with how we collect, use, and disclose information. This Privacy Policy describes our practices in connection with information that we or our service providers collect through the site operated and controlled by us from which you are accessing this Privacy Policy (the "Site"). By providing personal information to us or by using the Site, you agree to the terms and conditions of this Privacy Policy.

Privacy Notice of Non-Employees of Johnson & Johnson and its Affiliates

Non-employees of Johnson & Johnson and its affiliates may be granted access to this Site for the purpose of performing their obligations to the company, managing learning plans and activities, accessing employee directories and organizational charts, and updating such personal information as may be necessary to the business relationship between the non-employee and the Company. Due to the global nature of our operations, the Company may disclose and transfer Personal Information to personnel and other departments within the Johnson & Johnson Family of Companies for business purposes. Users are advised that some information, such as your contact details, may be available to other Johnson & Johnson affiliates worldwide.

Johnson & Johnson Services, Inc. and other Johnson & Johnson affiliates in the U.S that receive Personal Information from affiliates in the European Economic Area (EEA), abide by the Safe Harbor Framework with respect to Personal Information they receive from the EEA. As a condition of accessing the Site and Personal Information relating to employees and other non-employees of the Company, non-employees may only use Personal Information to perform their obligations to the Company

CROSS-BORDER TRANSFER

Your personal information may be stored and processed in any country where we have facilities or service providers, and by using our Site or by providing consent to us (where required by law), you agree to the transfer of information to countries outside of your country of residence, including to the United States, which may provide for different data protection rules than in your country. By visiting or using any part of this Website, you agree to the terms of this Privacy Policy as they may be amended from time to time. As we update and expand our Website, this Privacy Policy may change, so please check this web page for updates to our Privacy Policy. Further, this Privacy Policy is incorporated into, and is a part of, this Website's Legal Notice agreement, which also governs your use of this Website.

Collection of Information

When you visit our Website, we may collect information regarding your visit from your computer. Such information helps us to determine information about how you found our Website, the date that you visited our Website and search engines that may have led you to our Website. We collect this information in order to continually improve and enhance the functionality for this Johnson & Johnson Learning Management System website.

Generally, you may provide us with two types of information (User-Provided Information and Website Usage Information), both of which are discussed in greater detail below.

Personal Information you choose to provide

In order to make your visits to our Website as enjoyable as possible, we may ask you for Personal Information. Personal Information includes, for example, your name and e-mail address, both of which you may be asked to provide when registering with Cornerstone. A description of some of the ways that you may provide Personal Information to us, as well as further details on how we may use such Personal Information, is given below.

1. Contact us/feedback

If you email us through a "Contact us" link on our Website, we may ask you for information such as your name and e-mail address so we can respond to your questions and comments. If you choose to correspond with us via e-mail, we may retain the content of your e-mail messages, your e-mail address and our response to you.

2. Questionnaires and surveys

We may occasionally ask viewers of our Website to complete online surveys and opinion polls about their activities, attitudes and interests. These surveys help us serve you better and improve the usefulness of Cornerstone. In requesting your participation in these surveys, we may ask you to provide your name and e-mail address to us.

3. Bulletin Boards

Our Website may offer its users the opportunity to use bulletin board blogs and chat rooms, and engage in discussions with other users. If you choose to use these features, you should be aware that any Personal Information you submit through these features can be read, collected or used by other viewers of these forums and could be used to send you unsolicited messages. We are not responsible for the personal information you choose to submit in these forums.

Website usage information:

1. Cookies

When visiting Cornerstone, we may use "cookies" on or in connection with our Website to maintain information about you. A cookie is a very small text document, which often includes an anonymous unique identifier and additional information necessary to support the sites intended functionality. The Johnson & Johnson Learning Management System employs the use of "session" cookies. A session cookie is temporary and disappears after you close your browser.

When you visit our Website it will then send a session cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits our Website to access the cookies it has already sent to you and not the cookies sent to you by other websites. Except as otherwise set forth herein, all of our cookies are necessary for the provision of our services. We do not employ any third-party advertising cookies on our site. The following is a list of the cookies we use and their functionality

Analytics Cookies

- c-c-n ○ Session-based
 - Description: This cookie provides our 24x7 global performance monitoring system with regional statistics to ensure our pages load quickly and consistently.
 - Contains the name of the portal logged into and the numeric system identifier of the logged in user. Does not contain any Personal Information.

Functional Cookies

- __accss ○ Session-based
 - Description: This cookie is used for automated course launch functionality in the Curriculum Player. The cookie keeps track of the Curriculum ID if launched in the Curriculum Player and the next Learning Object to be launched.
 - Contains Curriculum and Learning Object GUIDs. Does not contain any Personal Information.
- anon_users_cart_cookie ○ Session-based
 - Description: This cookie is used to temporarily hold items placed in the shopping cart by an anonymous user. The items are transferred to the user's shopping cart once they log in with their individual account. Selected items would be lost without this cookie.
 - Contains Learning Object GUID. Does not contain any Personal Information.
- ASP.NET_SessionId ○ Session-based
 - Description: This is a default cookie that is required for ASP based pages to load. Without this cookie, our website will not function.
 - Contains the unique session identifier. Does not contain any Personal Information.
- c-s ○ Session-based
 - Description: This cookie is required to support content file encryption and Java applets.
 - Contains the IP address of incoming machine and the name of the portal logged into.

- CYBERU ○ Session-based
 - Description: This cookie is used to support session timeout due to inactivity.
 - Contains the unique session key and the URL.

- CYBERU_lastculture ○ Session-based or persistent depending on back-end configuration setting.
 - Description: This cookie is used to ensure our login and maintenance pages load in the local language of origin.
 - Contains the Region (ex. U.S.) of the incoming machine.

- CyberUErrorMessage ○ Session-based.
 - Description: Carries over error message from the originating page to the actual page that displays the error.
 - Contains error message GUID. Does not contain any Personal Information.

- QS_COOKIE_ENC ○ Session-based
 - Description: This cookie is required for query string encryption when the user is logged out of their session so that the user's returnUrl link can navigate back to the same page and be successfully decoded.
 - Contains first eight characters of the session ID. Does not contain any Personal Information.

Most web browsers can be adjusted to inform you when a cookie has been sent to you and provide you with the opportunity to refuse that cookie. However, refusing a cookie may, in some cases, preclude you from using, or negatively impact, the display or function of, our Website or certain areas or features of our Website. There are many resources on the internet that can provide more information about how cookies work and how you can manage them. One very informative non-profit site is www.allaboutcookies.org

2. Clear GIFs

When visiting The Johnson & Johnson Learning Management System, we may also use "Clear GIFs" (a.k.a. "web beacons" or "pixel tags") or similar technologies in our Website and/or in our communications with you. A Clear GIF is typically a one-pixel, transparent image located on a web page or in an e-mail or other type of message, which helps us to verify an individual's viewing or receipt of a web page or message. Clear GIFs allow us to know whether you have viewed a web page prior to visiting our Website and may enable us to relate such information to other information, including your personal information. We use information provided from Clear GIFs to allow more accurate reporting, improve the effectiveness of our system and make The Johnson & Johnson Learning Management System better for our users.

3. IP address and Clickstream data

Our servers automatically collect data about your Internet Protocol Address when you visit us.

When you request pages from our Website, our servers may log your IP address and sometimes your domain name. Our servers may also record the referring page that linked you to us (e.g. another website or a search engine); the pages you visit on this Website; the website you visit after this Website; other information about the type of web browser, computer, platform, related software and settings you are using; any search terms you have entered on this Website or a referral website; and other web usage activity and data logged by our web servers. We use this information for internal system administration, to help diagnose problems with our servers and to administer our Website. Such information may also be used to gather broad demographic information, such as country of origin and Internet service provider. Personal Information including IP addresses are not used to facilitate contact with users who have not provided their contact details to Johnson & Johnson. Personal Information is not shared with any third party marketers.

Rights to opt in/opt out

You have the right to "opt in" and/or "opt out" of certain of our uses of your Personal Information. For example, you may have the opportunity to elect whether you would like to receive correspondence from us. You can also request this by submitting a request to SUMMIT LMS Operational Support team via [IRIS](#) or by calling Help & Support contact numbers listed on login page.

Please understand that if you opt out of receiving promotional correspondence from us, we may still contact you in connection with your relationship, activities, transactions and communications with us.

Use, Disclosure, and Sharing of Personal Information

In addition, personal data may be disclosed to third parties, located in the United States and/or any other country, but only:

- (i) to contractors we use to support our business and other vendors who provide business support and technical services. Such vendors are obligated to treat employee personal data in accordance with this Privacy Statement.
- (ii) where required by applicable laws, court orders, or government regulations, or pursuant to a valid request of a governmental

agency

1. Aggregated statistics

We may disclose non-personally identifiable aggregated statistics regarding user behavior as a measure of interest in, and use of, our Website and e-mails to third parties in the form of aggregated data such as overall patterns or demographic reports that do not describe or identify any individual user. Information relating to aggregated statistics will be collected through the use of third-party cookies and other third-party tracking devices.

2. Legally compelled disclosures

We may disclose your Personal Information if required to do so by law or subpoena or if we believe that such action is necessary to (a) conform to law applicable to us, our group or our partners, comply with a judicial or court order or comply with legal processes served on us or Affiliated Parties; (b) protect and defend our rights and property, the Website, the users of the Website and/or our Affiliated Parties; or (c) act under circumstances to protect the safety of users of our Website, ourselves, or third parties.

By providing Personal Information to us through this Website, you agree that it may be used by us and our Affiliated Parties for the purposes described herein and you further understand and consent to the collection, maintenance, processing and transfer of such information in and to the United States and other countries and territories, which may have different privacy laws from your country of residence and which may afford varying levels of protection for your Personal Information. Regardless of the laws in place in these countries, we will treat the privacy of your information in accordance with this Privacy Policy. **By providing your Personal Information to this Website, you consent to our transmission to and processing of your information in any jurisdiction in accordance with this Privacy Policy.**

Your access and correction rights

You retain the right to submit and correct your Personal Information by contacting your organization.

Third-party websites When you are on this Website you may have the opportunity to visit or link to other websites, including other websites operated by us or by unaffiliated third parties. These websites may collect Personal Information about you, and because this Privacy Policy does not address the information practices of those other websites, you should review the privacy policies of such other websites to see how they treat your Personal Information.

Privacy of minors

This Website is not directed at children under the age of eighteen and we do not knowingly collect Personal Information from children under the age of thirteen on our Website. If we become aware that we have inadvertently received Personal Information from a visitor under the age of thirteen on our Website, we will delete the information from our records.

Security

We use commercially reasonable and industry-standard physical, managerial and technical safeguards to preserve the integrity and security of your Personal Information. We also use Secure Sockets Layer (SSL) encryption when transmitting sensitive information. Whilst we endeavor to protect the security and integrity of sensitive Personal Information provided to this Website, due to the inherent nature of the Internet as an open global communications vehicle, we cannot guarantee that information, during transmission through the Internet or while stored on our systems or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers.

If you contact us by e-mail or a "contact us" or similar feature on the Website, you should be aware that your transmission might not be secure. An unaffiliated third party could view information you send by these methods in transit. We accept no liability for disclosure of your information due to errors or unauthorized acts by third parties during or after transmission.

In the unlikely event that we believe that the security of your Personal Information in our possession or control may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we shall endeavor to do so as promptly as possible under the circumstances, and (insofar as we have your e-mail address) we may notify you by e-mail. **You consent to our use of e-mail as a means of such notification. If you would prefer us to use another method to notify you in this situation, please submit a request to SUMMIT LMS Operational Support team via [IRIS](#) or by calling Help & Support contact numbers listed on login page with the alternative and/or additional contact information you would like us to use.**

Updates to our privacy statement

This Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our online information practices. We will post a prominent notice on this Website to notify you of any significant changes to our Privacy Statement and indicate at the top of the statement when it was most recently updated.

Conditions of use

If you choose to visit Johnson & Johnson Learning Management System Website, your visit and any dispute over privacy are subject to this Privacy Policy and our Terms of Use Agreement (incorporated by reference herein, as amended from time to time), including limitations on damages, arbitration of disputes and application of the law of the State of California.

Language

The governing language of this Privacy Policy is English, which shall prevail over any other language used in any translated document.

Contact us

If you have any questions or comments about this Privacy Policy, or if you would like to review, delete or update information we have about you or your preferences, please contact us as follows:

By submitting a request to SUMMIT LMS Operational Support team via [IRIS](#) or by calling Help & Support contact numbers listed on login page.