Adapted PRIVACY IMPACT ASSESSMENT (Adp-PIA)

Third-Party Website or Application Name:

THALOMID Risk Evaluation and Management Strategy (THALOMID REMS™) Website

DoD Component Name:

US Army Medical Command - DHP Funded Initiative

This Adapted PIA (Adp-PIA) Form 2930A is to be used when personally identifiable information (PII) is likely to become available via a third-party website or application (such as Facebook and YouTube). Refer to the Appendix for the definition of third-party websites or applications.

This Adapted PIA (Adp-PIA) is intended to support the management of risk to privacy. If it is likely that personally identifiable information (PII) will become available via a third-party website or application, complete this form.

(1) Describe the specific purpose of the DoD Component's use of the third-party website or application.

To avoid embryo-fetal exposure, THALOMID® (thalidomide) is only available under a restricted distribution program called "THALOMID Risk Evaluation and Mitigation Strategy (REMS)™." The purpose of the THALOMID REMS is to inform patients, prescribers, and pharmacists of the serious risks and safe-use conditions for THALOMID. The Celgene Corporation produces THALOMID and is responsible for administering its REMS program. Only certified prescribers can prescribe THALOMID and only certified pharmacies can dispense THALOMID in the THALOMID REMS program. In order to receive THALOMID, patients must be enrolled in THALOMID REMS program and agree to comply with the requirements of the program. Both the patients and providers must complete an agreement form to participate in the THALOMID REMS program. This agreement form is generated by and maintained on the Celgene THALOMID REMS website.

(2) Describe any personally identifiable information (PII) that is likely to become available to the DoD Component through public use of the third-party website or application.

No PII is likely to become available to the DoD Component through public use of the Celgene THALOMID REMS website.

(3) Describe the circumstances under which PII will likely become available on the third-party website or application.

The PII becomes available on the Celgene third party website when the patients and providers enroll in the THALOMID REMS program.

(4) With whom will the DoD Component share PII?

PII will only be shared with the providers and pharmacists within the US Army Medical Command medical treatment facilities using this web application.

(5) Will the DoD Component maintain PII? If yes, for how long, and under what circumstances?

In accordance with the Celgene THALOMID REMS program policy, the DoD Component will maintain the signed patient/provider agreement form in the patient's medical record indefinitely.

(6) Describe the means and steps by which the DoD Component will secure PII that it uses or maintains.

The confidentiality of any PII used and maintained by the DoD Component will be protected through the use of administrative, physical, and technical security safeguards. These include:
- PII will be used only for the intended purpose of this application. Only personnel with a need-to know can access the data.
- Firewalls, authentication, and encryption will be used to secure information processed. Vulnerability assessments are conducted to ensure data is protected.
- While data is being processed, all available security best practices are adhered to. Security controls are in place to ensure data is stored, processed, and transmitted by approved secure methods.
- Individuals who access the PII must complete Information Assurance Awareness, Privacy Act, and Health Information Portability and Accountability Act (HIPAA) training on an annual basis.

(7) Describe what other privacy risks exist and how the DoD Component will mitigate those risks.

There may be privacy risks to the PII residing on the Celgene website that are not under the control of the DoD Component. The Celgene privacy policy is as follows:
Celgene Corporation Privacy and Data Protection Policy
Celgene Corporation recognizes the importance of protecting the privacy of information we collect from visitors to our Web sites. To this end, we are committed to using our best efforts to respect our visitors' privacy. While the security of information in transit over the Internet cannot be assured, our privacy practices are designed to give customers choices and control over personally identifiable information and to ensure that we use information we receive in ways compatible with the purposes for which it has been collected by the individual. We have established this Privacy Policy for the Celgene Corporation global network of Web sites and are posting it here so that you can understand the care with which we intend to treat your information.

What information do we collect and how do we use it?
Some of the information we keep on our Web server is information that site visitors volunteer to provide through forms and some is collected automatically. We only collect personally identifiable data, such as your name or email address or geographic location, when it is voluntarily submitted to us.

Our server automatically collects information in aggregate form to track the total number of visitors to our site, the number of visitors to each page of our site, and the domain names of our visitors' Internet service providers. No personally identifiable information is collected automatically. We use this aggregate information to help us better understand site visitors' needs and to improve our products and services.

In some places on our site, Celgene uses a technology called cookies. A cookie is a token that a server gives to your browser when you access a Web page. Cookies help provide additional functionality, making a visit to our Web sites more efficient for the visitor. The use of cookies allows us to collect more accurate information regarding aggregate use of our Web sites. In order to provide the highest possible level of customer service, cookies allow us to track paths through the site to identify users' unmet information needs. We do not collect personally identifiable data through cookies.

Celgene offers site visitors the option of submitting a resume for employment consideration. Resumes submitted through our Web site are shared only internally or with vendors Celgene has engaged to assist us with our Human Resource processes. Any vendors or service organizations Celgene engages to assist us are also required to follow this Privacy Policy.

Visitors to our Web site may email us from time to time with requests for information. The information provided in these email messages is used to respond to your request.

Celgene Web sites are not intended or designed for children under the age of 13. We do not collect personally identifiable data from any person we know to be under the age of 13.

With whom do we share the information we collect?

We do not share information we collect from our Web sites with other organizations except for members of the Celgene group of companies in the United States, the European Union, and elsewhere, vendors or service organizations we have engaged to assist us with completing a service (a CME organization to award continuing medical education credits for example), or unless required by law (reporting safety information to regulatory authorities for example). Any vendor or service organization to which we provide such information is also required to follow this Privacy Policy. We do not sell or rent personal information to other organizations for their commercial use. We do not partner with or have special relationships with any ad server companies.

Some users of our Web sites are invited to participate in nonpublic, secure (password-protected) sites. Members who choose to participate in these sites also have access to their own and other members' profile information, including personal contact information.

How can site visitors view, change, or delete their information?

You may have access to your personal information at any time to revise, correct, or delete it by contacting us. For previous submissions related to Medical Services please contact Medinfo@celgene.com. For previous submissions related to Career and Employment please contact Careersnj@celgene.com. For previous submissions related to Investor Relations requests please contact IR@celgene.com. For previous submissions related to Celgene Patient Support® contact Patientsupport@celgene.com. For all other inquiries please email us at Privacy@celgene.com.

How is personal information secured and protected?

Personally identifiable data are stored in secure databases relevant for the purposes for which it was collected that are accessible only to authorized Celgene employees and contracted vendors.

What is the policy related to third-party sites?

Celgene provides links to third-party sites as a convenience to our site visitors. Links to third-party sites do not constitute an endorsement or a warranty of any kind. Celgene is not responsible for the privacy practices or the content of such Web sites. We suggest contacting these sites directly for information on their data collection and distribution policies.

What if this Privacy Policy changes?

From time to time, we may use Web site visitor information for new, unanticipated uses not previously disclosed in our Privacy Policy. Any changes to our Privacy Policy will be promptly communicated on this page. We will also send visitors for whom we have a valid email address a notice through email with a link to this page and provide an option to opt out of new uses.

How can I contact you to get more information?

If you have questions about this Privacy Policy, the practices of this site, or your dealings with this Web site, please contact us. We will address any issue to the best of our ability. You can contact us via email at Privacy@celgene.com or by phone at +1-908-673-9000, or by postal mail at:

Celgene Corporate Headquarters
Attn: Privacy Matters
86 Morris Avenue
Summit, NJ 07901

Last updated December 14, 2009.

For more information about Celgene products, visit our Web site: www.celgene.com.

(8) Will the DoD Component's activities create or modify a "system of records" under the Privacy Act? If yes, describe.

The DoD Component will not create or modify a "system of records" under the Privacy Act. The Privacy Act DoD System of Records Notice - A0040-66b DASG - addresses the handling of PII contained in the the health care records maintained at the Office of The Surgeon General and US Army Medical Command organizations.