

e-Health Code of Ethics 2.0

Japan Internet Medical Association, a specified nonprofit organization

Introduction

The Internet has dramatically changed the world. Via broadband and improved access from cell phones and other mobile devices, Internet access has improved significantly. Today, the Internet is a necessary tool for day-to-day living. As in other fields, there is widespread use of the Internet for information on illness, wellness, and medical care and for online healthcare services.

Given the Internet's ability to overcome limits of geographical distance and time, future uses and services are expected. Due to growth in Internet use and advancements in related technology, increasing attention has focused on needs for quality assurance of online information and services, maintaining privacy, and ensuring security. Effective measures are needed to address these important issues.

The e-Health Code of Ethics, a voluntarily adopted set of standards for use of information technology in healthcare (e-Health), calls for protection of important personal information (privacy), while ensuring quality of information and services provided. Main aspects of the code of ethics are disclosure of information, content, communication, care, services, and commerce. By advising on points of caution, this code of ethics assists medical institutions, companies, and other groups to design and build reliable websites. Operators of websites that are easy to access and use can maintain good relationships with users.

Assessments of medical websites are undertaken according to the criteria of the Japan Internet Medical Association's (JIMA) code of ethics. When medical websites meet these uniform standards, a trust mark from an accreditation program can be displayed on the website. Although it is generally accepted that using information and services on the Internet requires some responsibility on the part of users, specialized knowledge such as medical information requires particularly careful use. From the users' perspective, it also is important that providers of healthcare information and services show care and consideration.

Internet technology evolves constantly. Today, new technologies and services have arisen, such as blogs, Internet community services, social networking services (SNS), and “second life” virtual spaces. Because of problems that occur from using unfamiliar technologies, it is necessary to implement new standards and ways to ensure the quality of new services.

JIMA, which established and operated the pioneering e-Health Code of Ethics^a as a voluntarily adopted set of standards for the private sector, has updated Version 1.1.0^b to Version 2.0^c in anticipation of future changes in Internet use. To provide standards that are easier to understand and use, we have performed a major revision of the text, completely revised the structure and arrangement of articles, added areas to address new services available from medical institutions, and included examples of relevant government guidelines and laws.

Currently, content on websites, especially unregulated advertising on medical institution homepages, is left to the providing medical institutions. However, these guidelines should be revised to ensure consistency with future, standardized guidelines released by relevant offices, ministries, and/or associated organizations. For the safety of and accessibility by both users and website operators, we leave any items that are not stipulated in detail here (especially the handling of virtual spaces) to the prudent discretion of the parties concerned.

Scope of the e-Health Code of Ethics

The e-Health Code of Ethics may be applied to institutions, corporations, organizations, networks, other groups, and individuals that provide healthcare information and services on the Internet. This ethical code is not limited to the following categories and may be applied elsewhere when appropriate:

- medical institutions, such as hospitals, clinics, maternity centers, and pharmacies
- medical staff (physicians) and allied healthcare personnel (e.g., nurses and pharmacists)
- insurers, such as health insurance associations
- health-testing institutions (e.g., clinical laboratories)
- institutions for health guidance
- public organizations and institutions that provide information and services related to

- medicine, health, and public welfare
- private corporations, organizations, and other groups that provide information and services related to medicine, health, and public welfare
 - pharmaceutical companies
 - educational institutions, such as universities and technical schools
 - academic societies
 - patient groups
 - individuals

Organization and Operation of the e-Health Code of Ethics

The e-Health Code of Ethics provides a uniform set of standards for the content and delivery of information and services provided on websites. In order to make the code of ethics easy to understand and focused on information related to the website operator, the content is divided into the basic topic, or the disclosure of information and 6 main topics: content, communication, care, services, commerce, and privacy. Details on these main topics are presented in subsections.

When undertaking self-assessment, website operators will voluntarily assess their adherence to any items relevant to information and services they provide. Because it is difficult to establish a standard to determine the degree of conformity to each item, there will be cases in which the self-assessment will be influenced by the website operator's subjective opinion. In cases of items that are not clearly stipulated in the code of ethics, website operators will need to perform a self-assessment based on appropriate standards and voluntarily work to improve quality.

1 - Basic Disclosure of Information

1.1 Disclosure of information about the website operator

Basic information about the website operator is disclosed. Basic information includes the name of the website operator (e.g., institution, corporation or other group), name of a representative, postal address, telephone number, fax number, and e-mail address. Typically, this information is posted in an accessible location, such as the front page or on a page directly linked to the front page.

1.2 Disclosure of information about sponsorship

When website operation is sponsored by other parties, such as advertisers or shareholders, or when a benefit is received by clicking on links to outside commercial websites, these facts are to be disclosed.

1.3 Information on access methods

Easy-to-understand information is provided on website accession through devices such as personal computers, cell phones, and other mobile devices. Also, the required Internet communication environment is discussed.

1.4 Disclosure of precautionary information

Precautions and disclaimers about security, protection of privacy, and other items concerning safety when using the website are disclosed in an easily understood manner.

1.5 Contact center

A contact center is established to receive general inquiries, opinions, and complaints pertaining to website use. When the contact center is managed by an external contractor that handles the outside operation and maintenance of the website, information including the contractor's name, telephone number, and e-mail address is given.

2 - Content

Content refers to general information about illnesses, diagnosis, treatment, and the practice of healthcare by medical institutions for the purpose of education and/or advertising and promotion. This pertains primarily to written text, but also includes information in the form of numbers, data, still and moving images, and sound. In addition to clearly displaying the provider, the intended recipient, and conditions for use, objectivity and accuracy of the content is ensured. Moreover, caution is advised for proper and safe use of the website.

2.1 Information on the content provider

Information about the content provider is disclosed. When the content provider differs from the site operator, this relationship is clarified.

2.2 Intended recipients of content

2.2.1 The intended recipients of the content are clarified. For medical content, the intended recipients are defined as either medical professionals with specialized knowledge or general users, such as patients and other consumers. When the language and content differs according to geographic region, age, and/or gender of intended audience, the information is provided in an easily understood manner.

2.2.2 In response to the previous item, changes in layout, design, and/or a special entrance to the site are provided to make it easy for the user to distinguish type of content. Also, transfer from the website to a different page is clarified.

2.3 Details and use of content

The details and use of content are explained in an easily understood manner.

2.4 Terms of use pertaining to content

In cases in which accessible content differs according to whether the user is a registered or paying member, terms of use are explained in an easily understood manner. Also, when registration of personal information, identification, and/or password is required to access content, a preliminary explanation and agreement is established, followed by providing content.

2.5 Precautions during use

Any special instructions, precautions, and disclaimers about use of content are disclosed in an easily understood manner.

2.6 Writing, production, and/or editorial supervision of content

2.6.1 Information about writing, production, and/or editorial supervision of content is provided.

2.6.2 For content involving an audience with high levels of medical expertise, the website clearly specifies whether its writer, producer, and/or editorial supervisor is a healthcare professional, so that the user can determine the reliability of the content.

2.7 Content involving material that is copyrighted

2.7.1 Authors who write content which involves material that is copyrighted will adhere to copyright and related laws. Likewise, for material that is trademarked or has specified rights, the authors and website operators will adhere to trademark and related laws.

2.7.2 Content is written so that users can discern what information is original, referenced from other sources, or quoted.

2.7.3 When permission is required for secondary use of third-party material in website content, the necessary information is stated clearly.

2.8 Objectivity and accuracy of content

As a rule, objectivity and accuracy of information is assured.

2.9 Up-to-date content

2.9.1 As a rule, up-to-date content is assured.

2.9.2 In cases where the meaning or assessment changes over time, appropriate explanations are added, as necessary.

2.9.3 The website clearly states the date when content was first made public and when the information was updated.

2.10 Medical information

2.10.1 Medical information provided has a scientific basis and meets present standards of acceptability.

2.10.2 In cases in which information has not been evaluated yet, necessary explanations or reference material is included, so that users understand this and use their own judgment.

2.11 Information on medical results

2.11.1 When outcome information based on medical results is provided, there is differentiation between objectively assessed results and results for which such assessment is difficult. Each type of results is discussed in an appropriate way.

2.11.2 When outcome information based on medical results is provided, caution is taken so that misunderstandings and miscommunications do not occur, particularly among general users such as patients and consumers.

2.12 Information about assessments and/or accreditations from third-party institutions

2.12.1 When assessments and/or accreditations are received from third-party institutions and acknowledged in the contents and services provided by the website or in the actual treatment provided at hospitals and other medical facilities, facts about the assessment and/or accreditation and objective information about results are provided. Caution is taken so that misunderstandings or miscommunications do not occur among users.

2.12.2 As a rule, links and their contents are verified, when using websites provided by a third-party institution to make information public about third-party assessments and/or accreditations.

2.12.3 Up-to-date assessments and/or accreditations by third-party institutions are verified. In the event of changes, including revocations and revisions, information is corrected and updated promptly.

2.12.4 When rules exist for use of approval marks indicating receipt of a third party institution's assessment and/or accreditation, use of these marks follow guidelines for use.

2.13 Information about third-party assessments and word-of-mouth communication

To reduce misunderstandings and miscommunications on the part of users, when websites quote and reprint mass media articles, other writing, word-of-mouth communication, and evaluations for which objectivity cannot be guaranteed, care is taken to avoid immoderate expressions suggestive of superiority and personal gain.

2.14 Sources of information

When providing information, sources are disclosed, as necessary.

2.15 Appropriate expressions

2.15.1 Expressions used in content are suitable for the level of comprehension and understanding of the assumed principal users.

2.15.2 Writing and expressions use accurate and appropriate terms and grammar, so that the language is easy to understand.

2.15.3 The size and color of the text is easy to read.

2.15.4 Content that uses still and moving images, sounds, and other special software is used suitably, keeping in mind the Internet access environment of users.

2.16 Methods for providing content

For cases in which services such as file downloads are provided, information is given about the size, required software, and procedure for downloading.

2.17 Links and frames

2.17.1 When users are transferred by links to outside websites, including commercial and sponsor websites, care is taken so that users easily will know that they been transferred to another page by use of an intermediary page, pop-up page, or other means.

2.17.2 Links to pages are presented so that users can discern whether the page to which they are moving is within or outside the original website.

2.17.3 As a rule, links to pages within and outside the website are not broken.

2.17.4 Content that is presented by an outside website using frames on the same page is presented in such a way that users understand the association with an external website.

2.17.5 Frames using outside websites are not used without permission of the external website.

2.18 Consideration for user environment

When users are presumed to have special circumstances related to sight, hearing, or other physical capabilities, consideration is given to barrier-free presentation of material, so as to lessen the burden on users.

2.19 Disclosure of non-substitution for diagnosis and treatment

Any information about diagnosis and treatment of illness is indicated clearly as being solely for reference and not to be used in place of actual diagnosis and treatment.

2.20 Consultation with a specialist

If users perceive any unclear points, or if users have other questions about the information, they are encouraged to consult doctors or other healthcare specialists.

2.21 Adherence to relevant laws and regulations

2.21.1 Content and its delivery will adhere to all relevant laws, regulations, guidelines, and notices.

2.21.2 As content and delivery of online information provided by medical institutions may be subject to laws and regulations governing medical advertising, such content should adhere to the “Guidelines on items that can be advertised and guidance for proper advertising for medical and dental practitioners, hospitals and clinics (Guidelines for Medical Advertising)” established by the Ministry of Health, Labour and Welfare (MHLW) in Japan.

3 - Communication

Communication includes, but is not limited to, e-mail, e-mailing lists, electronic bulletin boards, blogs, social networking services (SNS), and Internet-based teleconferencing systems. It is understood that online communication among medical professionals, patients, families, and support groups has restrictions and limits, because it is not face-to-face communication. As online communication among these audiences should be conducted with mutual respect, participants should be encouraged to remain mindful of manners and etiquette. Also, effort is needed to facilitate these reciprocal relationships.

3.1 Information about communication providers

Information is disclosed about providers of communication services. For cases in which the website operator differs from the communication provider through use of outside services, relationships are clarified.

3.2 Intended recipients of communication

The intended recipients of communication are clarified. For cases in which content of the communication differs according to whether the user is a medical professional or a patient, the information is provided in an easily understood manner.

3.3 Content and use of communication

Users are notified about content and use of communication in an easily understood manner.

3.4 Terms of use for communication

In cases in which accessible communication differs according to whether the user is a registered or paying member, the terms of use are explained in an easily understood manner. Also, when registration of personal information, identification, and password are required to use communication, a preliminary explanation on the website and agreement by the user precede availability of the communication.

3.5 Precautions during use

Any special instructions, precautions, and disclaimers about use of communication are disclosed in an easily understood manner.

3.6 E-mail

3.6.1 When personal communication is conducted through e-mail, it is clear who is transmitting and who is receiving.

3.6.2 For cases in which consultation about conditions and health are not accepted by e-mail addresses intended for general inquiries, this restriction is clearly indicated, so that users do not send highly private e-mails.

3.7 Mail magazines

When mail magazine services are provided, easy-to-understand information for beginners is given about the availability and use of mail magazine services.

3.8 Mailing lists

3.8.1 When mailing list services are provided, easy-to-understand information about the availability and usage of mailing lists is given to beginners.

3.8.2 Any disclaimers and prohibited uses regarding administration and operation of mailing lists are noted, so that users understand this in advance.

3.9 Electronic bulletin board

3.9.1 When electronic bulletin board (also called electronic conference room) services are provided, easy-to-understand information about electronic bulletin boards and its use is available to beginners.

3.9.2 Any disclaimers and prohibited uses regarding the administration and operation of electronic bulletin boards are disclosed in advance of use. Users must agree with or accept these disclaimers and prohibitions before they use electronic bulletin board services.

3.10 Blogs

3.10.1 When blogging services are provided, easy-to-understand information about blogging services and its use is available to beginners.

3.10.2 Any disclaimers and prohibited uses pertaining to the administration and operation of blogs are disclosed in advance. Users must agree with or accept these disclaimers and prohibitions before they use blogging services.

3.11 Social networking services (SNS)

3.11.1 Any disclaimers and prohibited uses pertaining to the administration and operation of the social networking services (SNS) are disclosed in advance. Users must agree with or accept these disclaimers and prohibitions before they use SNS. Users are also warned that unforeseen trouble due to use of SNS may occur, depending on privacy settings used for name, address, gender, and other personal information.

3.11.2 Any exemptions and prohibited uses regarding administration and operation of SNS are disclosed in advance. Users must agree with or accept these exemptions and prohibitions before they use SNS.

3.12 Use of outside services

When outside providers are used to provide blogs, social networking services (SNS), and other services, the identity of the system administrator is clarified. The degree of administration and policy for operation of communication are explained in an easily understood manner.

3.13 Deactivation and cancellation of communication

3.13 When users wish to deactivate or cancel communication, including services such as mail magazines, mailing lists, electronic bulletin boards, blogs, and social networking services (SNS), the necessary information and an efficient method to receive and process requests for deactivation or cancellation of communication is provided.

3.14 Contact center

A contact center is established to receive general inquiries, opinions, and complaints about use of the communication provided.

3.15 New communication

When new forms of communication become feasible following advances in Internet and web technology, easy-to-understand information about use of new forms of communication will be provided for beginners. In the instructions, care will be taken, so that the new forms of communication are not used erroneously or to the detriment of users.

3.16 Adherence to relevant laws and regulations

3.16.1 Communication will adhere to all relevant laws, regulations, guidelines, and notices.

3.16.2 Take caution when sending e-mail in the form of mail magazines, mailing lists, and other material that invites people who are not patients or professionals associated with the specified medical institution to seek treatment at the specified medical

institution. As such e-mail is considered an advertisement, it is subject to restrictions on advertisements under the Medical Care Law.

4 - Care

Care includes remote treatment, follow-up consultation by telephone, and ongoing guidance and advice that the doctor deems useful in treatment of chronically ill patients. The Ministry of Health, Labour and Welfare (MHLW) in Japan defines this approach as “using telecommunication devices to support medical care.” Care also includes health guidance services provided by health guidance organizations.

Care does not include consultation and advice about medical treatment that does not include an actual visit or that is unrelated to current medical treatment users are undergoing. When care is provided, quality of care, safety, and consideration of the environment and circumstances of users are assured.

4.1 Information about the care provider

4.1.1 Information about the care provider is disclosed. When the care provider differs from the website operator, their relationship is clarified.

4.1.2 When actual care is provided by licensed professionals such as doctors, other medical staff, and health guidance professionals, the validity of licenses of the healthcare professionals is confirmed. Also, information on databases and other resources where the user can access objective information about these licenses is provided.

4.2 Intended recipients of care

The intended recipients of care are indicated clearly.

4.3 Content and use of care

The content and use of care provided is explained in an easily understood manner.

4.4 Terms of use pertaining to care

The terms of use pertaining to care provided is explained in an easily understood manner. With online care, there must be a pre-existing doctor-patient relationship, or the care provider and recipient must have met in person previously.

4.5 Information about fees

When the user must pay a fee for the care provided, this is clearly indicated in advance.

4.6 Precautions during use

The website discloses any special information, precautions, and disclaimers about security, protection of privacy, and related items pertaining to the use of communication.

4.7 Professional ethics

Licensed professionals such as doctors, other medical staff, and health guidance professionals follow the ethical guidelines of medical providers to deliver high-quality care and services for patients and general online users.

4.8 Online care

When care is administered online, the scope and limits of online care are delineated appropriately. In situations in which online care is not appropriate, users can address the situation through a consultation or other visit.

4.9 Emergency response

There is clear indication that online care is not appropriate for emergencies. For cases of emergency, users are given advance notice to go to a hospital or seek proper instructions through telephone consultation with a doctor.

4.10 Response time

A set response time (i.e., the longest wait time) for Internet care is mentioned in advance.

4.11 Adherence to relevant laws and regulations

Care provided adheres to all relevant laws, regulations, and notices.

5 - Services

When medical- and healthcare-related services use the Internet to store, transmit, and/or deliver information involving patients, individuals, and medical institutions that concern examination appointments, medical consultation, treatment information, or prescription information, the relevant usage and precautions are explained in an easily understood manner. Also, consideration is given to the safety and best interests of users. The services referred to here include items related to medical services provided and are distinct from that of profit-oriented commerce (section 6).

5.1 Information about the service provider

5.1 Information about the service provider is disclosed. For cases in which the service provider differs from the website operator, as when an outside service is used, the relationship is clarified.

5.2 Intended recipients of services

The intended recipients of services are indicated clearly. Particularly when services provided differ by to the intended recipient, this distinction between types of recipients is clarified, and users are provided with information that is easily understood.

5.3 Service content

The content and use of services provided are explained in an easily understood manner.

5.4 Terms of use pertaining to services

When services differ or are limited based on whether the user is a registered or paying member, the terms of use are explained in an easily understood manner. Also, when registration of personal information, identification, and password are required to use services, a preliminary explanation on the website and agreement by the user precede availability of the services.

5.5 Precautions during use

Any special instructions, precautions, and disclaimers for use of services are disclosed in an easily understood manner.

5.6 Deactivation of services

The method and conditions for service deactivation are clearly indicated in an easily understood manner.

5.7 Paid services

In the case of paid services, necessary information, including fees and terms of use, are disclosed.

5.8 Providing information about diagnosis and medical treatment

When providing individuals with information about diagnosis, prescriptions of medications, and other types of treatment, information on the content, scope, and results is given to users in advance. After user consent has been obtained, services are provided.

5.9 Medical consultation

Users are notified that medical consultation without an office visit does not replace diagnosis and treatment.

5.10 Distinction from commerce

When services are provided and commerce (section 6) is offered, caution is taken so that confusion about the two types of offerings does not occur.

5.11 Response when a service is down

5.11 When an online service is interrupted due to maintenance or trouble with the information and communications systems, information is provided about alternative means of service and responses to emergencies.

5.12 Contact center for services

A contact center is provided to receive user questions and general inquiries. Contact information other than e-mail, such as telephone and fax numbers, is listed.

5.13 Adherence to relevant laws and regulations

Healthcare- and medical-related Internet services adhere to all relevant laws, regulations, guidelines, and notices.

6 - Commerce

Internet commerce that conducts profit-oriented activities, including advertising, promotion, and selling healthcare- and medical-related products and services, adheres to all relevant laws and notices. Adequate consideration is provided for the safety and best interest of users. Business practices are fair and honest.

6.1 Information about commerce providers

5.1 Information about the provider of products, services, and other profit-oriented activities is disclosed. When the commerce provider differs from the website operator through the use of outside services, the relationships are clarified.

6.2 Intended recipients of commerce

Intended recipients of commerce are clarified. Especially when the content of commerce provided differs, based on the intended recipient, this distinction is clarified in a manner easily understood by users.

6.3 Commerce content

The content and use of commerce are explained in an easily understood manner.

6.4 Terms of use pertaining to commerce

Terms of use pertaining to commerce are clearly indicated before use. After consent is obtained, commerce is provided.

6.5 Precautions during use

Any special instructions, precautions, and disclaimers for use of commerce are disclosed in a manner that is easily understood.

6.6 Discontinuation of commerce

The method and conditions for discontinuing commerce are clearly indicated in a manner that is easily understood by users.

6.7 Contact center for commerce

For commerce, a contact center and/or contact details for direct inquiries are listed.

6.8 Separation from medical content

As a rule, profit-oriented activities, such as advertising, promotion, purchase, and sale of products and services, are not conducted on the same page as medical content.

6.9 Separation from communication

As a rule, profit-oriented activities, including advertising, promotion, purchase, and sale of products and services, are not directed to unspecified users using communication (for purposes other than commerce), such as e-mail, mail magazines, mailing lists, and electronic bulletin boards.

6.10 Links

6.10.1 As a rule, pages with medical content do not provide direct invitations in the form of links and pop-ups to commerce sites.

6.10.2 When users are transferred to a commerce page, they easily can return to the previous page by clicking the back button.

6.11 Advertising and promotion

6.11.1 As a rule, e-mail used to advertise and promote profit-oriented activities is limited to situations when recipients “opt in” by giving their consent. In other words, the service is provided only after the recipient has consented.

6.11.2 As a rule, even after opting in once, the user can cancel receiving advertisements and promotions for profit-oriented activities at any time.

6.12 Advice and consultation about illnesses and health

Regardless of whether the commerce is a paid or unpaid service, users are notified that in the absence of a pre-existing doctor-patient relationship, any online advice and consultation about illnesses and health are not substitutes for diagnosis and treatment.

6.13 Adherence to relevant laws and regulations

Profit-oriented activities such as purchase and sale of products and provision of services, advertising, and promotion on the Internet adhere to all relevant laws, regulations, guidelines, and notices.

6.13.2 When appropriate, commerce websites or pages adhere to the Law on Specified Commercial Transactions for Internet Mail Order Transactions.

7 - Privacy

Personal information is defined as typical personal information, such as name and address, as well as information about the individual's health status and disease

conditions. For e-Health, a privacy policy is adopted. Handling personal information in e-Health adheres to the privacy policy. Security measures, including safe management of information systems, are implemented to prevent illicit acquisition of personal information, data tampering, and internal leaks that may occur as a result of illicit access.

7.1 Handling of personal information

Any handling of personal information by the website is disclosed.

7.2 Indication of a personal information administrator

The administrator of personal information is clearly indicated. When the operator of the website and the actual service provider differ, the administrator of personal information is clearly indicated.

7.3 Formulation of a privacy policy

When personal information is handled by the website, the personal information administrator adopts a handling policy including protective measures for personal information and posts it as either a personal information protection policy or a privacy policy.

7.4 Privacy policy

7.4.1 The privacy policy is displayed directly on the front page, on pages that ask users to provide personal information, and/or on a separate page accessed by link.

7.4.2 The privacy policy is written using easy-to-understand words, simple phrases, and simple sentences.

7.4.3 The date when the privacy policy was created, updated, and/or revised is listed.

7.4.3 When changes in regulations affect handling of personal information, the privacy policy is revised, and the updated privacy policy is posted.

7.5 Privacy policy requirements

A privacy policy that addresses the following basic requirements for handling personal information is posted:

- (1) Who collects personal information?
- (2) When is personal information collected?
- (3) What kind of personal information is collected?
- (4) Who uses the personal information?
- (5) What is personal information used for?
- (6) Currently, is personal information provided to third parties? Are there any plans to do so in the future?
- (7) When personal information is provided to third parties, who receives it? What is the reason for providing personal information to third parties?
- (8) Who manages personal information?
- (9) Ensures that individuals can verify their personal information and provides a way of doing so.
- (10) Ensures that individuals can update, revise, and delete their personal information and provides a way of doing so.
- (11) Describes the content and terms of services that can be used by supplying personal information. Also explains the disadvantages of withholding personal information.
- (12) Consent to use personal information or share it with third parties must be obtained in advance.
- (13) Retention period (or a deletion date) for personal information is clearly indicated.

7.6 Execution of privacy policy

When a privacy policy is adopted, a framework is constructed to carry out the adopted policy in website operation and related affairs.

7.7 Security

7.7.1 When using intranet LANs and external Internet connections, security measures are devised to effectively accommodate a variety of network environments through installation of firewalls, use of virus prevention software, and data encryption.

7.7.2 With regard to the execution of security policies, any assessments and/or evaluations performed either internally or by an outside, third-party institution are stated clearly.

7.8 Adherence to relevant laws and regulations

7.8.1 Protection of personal information adheres to all relevant laws, regulations, guidelines, and notices.

7.8.2 Handling of personal information adheres to the Personal Information Protection Law and derivative guidelines, such as “Guidelines for the appropriate handling of personal information for medical and healthcare professionals,” “Guidelines for the appropriate handling of personal information at the Health Insurance Society,” and “Guidelines for the appropriate handling of personal information at the National Health Insurance Organization.” Security adheres to “Guidelines for safe management of medical information systems.”

Addendum

^aVersion 1.0.0 of this code of ethics was instituted April 1, 2003.

^bVersion 1.1.0 of this code of ethics, which was revised August 1, 2004, was instituted September 1, 2004.

^cVersion 2.0 of this code of ethics, which was revised July 1, 2007, was instituted July 1, 2007.