



“Visit Two Websites and Tweet Me in the Morning”

Questions Consumers Should Ask about the Hidden Dangers of Online Health and Medical Marketing

Growing numbers of Americans—up to 80 percent according to some estimates—are turning to online sources in search of medical information and advice. From “general practitioners” such as WebMD to “specialists” such as Diabetic Connect, from Facebook pages (ADHD Moms, Breakaway from Cancer) to YouTube (GrowthHormoneTherapy, Parkinson’s Matters), “digital doctors” abound. The emergence of abundant and accessible medical resources online is often hailed as ushering in a new “Health 2.0” era. Consumers are increasingly described as empowered “e-patients,” who can also rely on social media and online communities for advice and support. But while the explosion of medical information services online, including via mobile devices, do provide substantial benefits, this marketplace is being shaped—largely invisibly—by pharmaceutical and healthcare marketers. Drug companies and other medical advertisers will spend nearly \$1 billion in 2010 on marketing online—a figure that is expected to reach \$1.52 billion by 2014.

In the online health arena, it’s increasingly difficult to determine where the advice ends and the marketing begins. Is that health expert we encounter online really an independent professional, or merely a paid and undisclosed spokesperson for a pharmaceutical company? Is the editorial information written to provide you with an objective discussion of a health problem, or to lure you to ask your doctor for a specific drug brand that advertises on the site? And what about the health information we might share online, either through registering for a particular site, or personal details we might happen to disclose in a social network? Or any of the data collected invisibly about us for so-called online profiling and tracking. Right now, it is impossible to determine precisely how site operators or their third-party affiliates might use that information. How many of us have read those obscure privacy policies on health and pharma sites, which allow for unconstrained use of our health information?

Here are a number of questions that consumers should ask—of themselves, of their online healthcare information providers, and especially of the pharmaceutical marketing industry that sponsors so many of the online health resources:

1. Is Behavioral Targeting Data Collection Conducted on the Site? The privacy threat posed by behavioral targeting, in which marketers deliver marketing based on the stealthily observed and compiled activities of consumers online, has been amply documented. But when the behavior in question extends into the sensitive area of

personal health, with symptoms and searches for treatments and cures added into the profiling and targeting mix, then the advertising practices are invasive. Before even entering a health-related website, then, we should ask, “Are my actions and inquiries being monitored? Will the content I view, and the ads and even information I receive, be shaped by such data-collection practices?” More than merely rhetorical questions, the answers to these queries should determine whether or not a particular health-related site is safe to enter, and health websites should make their data collection and user-profiling practices clear: How much data is collected from site visitors, and how is that information used? Consumers should have the right to have a choice—and be able to “opt-in” before any data can be harvested for targeting.

2. Does this site offer marketers “Condition Targeting?” An especially cynical variation on the behavioral targeting theme is the practice of condition targeting. Many health websites offer advertisers the ability to target an individual consumer based on their expressed or implied concern about an illness, including for sensitive concerns as depression, COPD, and diabetes. When those afflicted with an illness are attracted to sites that promise information and treatment, they aren’t told they have become targets for condition-specific digital marketing. And in the face of such manipulative marketing, the obvious question must be asked: What data on an individual user are being collected and how are they used?

3. Is My “Patient Journey” Being Followed Online by Health Marketers? Another aspect of medical targeting is the technique of sequential messaging, in which ads are personalized not simply for particular conditions or individuals, but for the specific stages of what health marketers like to call the “patient journey” online. Health consumers are monitored and analyzed as they go online by digital marketers, who can determine the phase of a person’s interest in a problem (such as someone looking for general information who then explores specific treatment options). Tailored for individuals as they move through the stages of diagnosis, treatment, and recovery from a particular illness or condition, this approach to medical marketing raises fundamental privacy issues.

4. Is this “Unbranded Site” About a Health Concern Really a Drug Company Promotion? Pharmaceutical companies are bankrolling so-called “unbranded” websites that allegedly offer consumers objective information about a health issue. Sometimes called “disease awareness” websites by medical marketers, their ultimate goal is to encourage consumers to ask their physician to order a specific brand drug or treatment. While the sponsoring drug company may have its name in the equivalent of online “fine-print,” consumers need to be clearly informed they are interacting with a digital infomercial. In other words, ask if this website may be hazardous to your health.

5. Is the Person Discussing a Health Problem or Treatment Really Independent or a Paid Spokesperson? “Nine out of ten doctors” may recommend a particular health product, and individual patients may swear to its effectiveness, but the Internet is full of testimonials and advice that are little more than advertisements, in that the spokespersons involved have been compensated for their statements. Existing regulations require

disclosure of paid endorsements, but such arrangements are often buried in a site's corporate fine print. Is that YouTube testimonial about a health problem or treatment from a "real" person not affiliated with the drug company—or from someone on its payroll? It is incumbent upon consumers, then, to evaluate the product testimonials they encounter online in an effort to distinguish between the unsolicited endorsements and sponsored statements.

6. What Happens to My Information When I Agree to "Free" Offers and Use Online "Discount" Coupons? Sometimes the most expensive items on the Internet are free, in that consumers must surrender personal information in order to take advantage of them. The online healthcare arena is replete with "free newsletters," "discount coupons," and the like, virtual "loss leaders" that are designed to serve as data-capturing devices. In view of the loss of privacy that such offers entail, consumers must ask themselves, "Can I really afford to accept this offer?"

7. Have drug companies used forms of physician-targeted digital marketing—e-Detailing—to get my doctor to promote their brands? The long-established practice of "detailing"—in which pharmaceutical sales reps are deployed to meet with doctors to explain the benefits of particular medications, and to offer free samples and other inducements to increase sales of those products—has now moved online. Armed with information about his or her practice, marketers can engage in new forms of "physician targeting" that serve only to add to the skyrocketing cost of pharmaceuticals. Smart consumers who have already learned to ask their doctors about generic alternatives to costly brand-name drugs now have another question to ask: "Is this prescription based on my health needs, or is it the result of pharmaceutical marketing?" (And on a related note, patients might want to consult ProPublica's "Dollars for Doctors" database, which lists physicians who have received promotional payments from seven of the largest drug companies.)

8. What Do Digital Marketers Learn When They Help Provide Electronic Health Records? The move from cumbersome paper records to online storage and retrieval of medical records and health insurance data has benefits for patients and practitioners alike. But electronic health records (EHR) records, especially in private hands and across wide area networks, raise many privacy concerns. Two of the largest online advertising companies—Google and Microsoft—offer consumers EHR's (Google Health and Microsoft's HealthVault), and also pitch their marketing clout to leading pharmaceutical and other medical advertisers. Consumers must ask themselves: are these services adding even more data points to the growing number of interactive health marketing campaigns?

9. Has the Drug Ad Been Developed using Neuromarketing? One of the latest developments in advertising, neuromarketing, draws on the techniques of neuroscience to measure consumer response to advertising, with the ultimate goal of crafting commercial messages that directly influence one's subconscious mind. Leading online advertisers are using the latest techniques to directly influence the behavior of our brains, bypassing the rational decision-making process consumers rely on to make informed decisions. Ads for powerful and expensive drugs pitched to us via new forms of subliminal persuasion

require consumer protection safeguards.

10. Are medical marketers monitoring what I do on Social Media? One of the most disturbing aspects of the Web 2.0 revolution is that it has given rise as well to Surveillance 2.0. Increased user participation in the creation of online content, in other words, has given advertisers and market researchers unprecedented access to consumer interests and tastes. In the process, through data-collection and -analysis technologies that monitor social networks and other forms of user-generated content, marketers have gained access to vast amounts of personal information. Such data are used to formulate advertising that is often delivered—in various forms—over the very same platforms on which consumers have so willingly expressed themselves. Even with the social media movement well under way, it's still not too late for participants to ask such questions as, “How can I be sure that the personal information that I share with others in online conversations won't be used for marketing purposes? How do I know that the ‘peers’ with whom I discuss health matters aren't also being targeted via social media marketing techniques involving ‘peer-to-peer,’ viral and ‘word-of-mouth’ advertising?”

11. Do Privacy Policies on Health Sites Really Protect My Privacy? In general, online privacy statements have been doubly disastrous: virtually no one reads them, and even if they did, the lengthy, complex documents are largely inscrutable. From the opening “We value your privacy” to the closing “These terms and conditions are subject to change,” it's never clear just what information is protected and what is fair game for outside interests to collect and analyze. Pharmaceutical and health-oriented websites, handling sensitive information as they do, should be held to the highest privacy standards. And users of these sites should be able to find clear, direct answers to the basic privacy questions: What kinds of data are collected? How is this information used? How can I affirmatively decide to avoid these practices altogether before data is collected, and thus keep my information confidential?

12. Have Online Marketing Techniques Been Used to Drive Emotional Responses to Drug Ads? Direct-to-consumer drug advertising on TV has raised concerns about the use of pleasing imagery and skilled actors to promote the sales of prescription drugs. (Remember that colorful butterfly that darts across the screen as a voice-over provides you with the risk and adverse-condition information?) Digital ads are developed using techniques purposefully designed to more effectively tap into a consumer's interests and concerns, including through interactive applications that “immerse” a consumer. The webpage you may go to can be expressly created just for you as well, in order to make it more effective for marketing. Pharmaceutical and health marketers should disclose what digital ad techniques they use to target consumers.

13. Is the risk information about a drug prominent and in detail on an online pharmaceutical marketing site or application? Many pharma marketers are

trying to replace what's known as risk and "fair balance" information about a drug's side effects or shortcomings with just a link and a few words of explanation. They argue that digitally savvy consumers know they can click to learn more about a product. But given all the techniques used online by medical advertisers to encourage a consumer to pay attention to engaging and interactive marketing, ensuring the risk information remains