

POLICY UPDATE

February 6, 2017

PTM HCP Email Marketing Policy

Further to consultations with clients, agencies and PAAB, and in an effort to assist in the optimal use of the email channel, PTM has made the following updates to its HCP Email Marketing Policy:

Direction

The PTM review committee will provide direction and suggestions following each review in order to ensure an efficient process, both in terms of cost and time.

Guidance

In response to requests for further guidance, we have provided examples in the attached policy of content that would not be approved for the email channel.

Research

PTM is continuing to conduct research with physicians to fine tune our recommendations for effective email communications.

PTM Policy on HCP Email Marketing

As of February 1, 2017

PTM continues to update its policy on email marketing. From the period of September to December, 2016, the number of unsubscribes was significantly increasing, which led to the review of PTM's email policy. PTM noted a direct correlation between the nature of a communication and the unsubscribes it received.

The policy changes are intended to optimize the impact and longevity of email marketing communications, with efforts to reduce the number of unsubscribes.

PTM considers this to be a transition period and welcomes the chance to meet with clients in person or on the phone for discussion and further input.

Since implementing the policy at the end of December 2016, we have noticed a significant reduction in unsubscribes per email. PTM will continue to monitor the situation and provide updates as they become available.

EMAIL POLICY

The Right to Decline an Email

PTM reserves the right to decline communications which are expected to result in a large number of unsubscribes. All emails are to be submitted to PTM's review committee. We recommend emails be submitted during the development stage (post concept/pre-execution) and **prior to a submission to PAAB.**

Where applicable, suggestions/direction will be provided with every submission to expedite the approval process.

BACKGROUND

CASL (Canadian Anti-Spam Legislation) - Why the Email Channel is Unique

- Emails are regulated by CASL which mandates unsubscribe options and allows email recipients to 'unsubscribe', permanently closing the channel.
- Emails arrive in a recipient's personal inbox on various platforms e.g. mobile, tablet, etc.
- Advertisements and communications that are appropriate for journals, websites, etc. are not necessarily welcome by HCPs in email format on personal digital devices.

The Losses of an Unsubscribe

- CASL policy on email marketing mandates that each email must have an unsubscribe option from both the sender/broadcaster and client/producer of the email. Therefore, PTM must allow recipients to unsubscribe from:
 - The product
 - The company/client
 - All communications
- If they select your product, this is a major loss for your brand as this channel is now closed for brand email communications.
- If they select your company, this is a greater loss as this channel is now closed for email communications for all products and divisions within your company.
- If they select from "All communications", this closes the email channel to this individual for both PTM and its clients.
- PTM has reviewed this situation with a committee of HCPs prior to setting this policy and they continue to act as consultants in the review process.

BEST PRACTICES – In Development

Subject Line

Subject lines are expected to convey an informative/clinical/educational message. They are to focus on the value of the content within the email, while not triggering SPAM filters.

EXAMPLES OF NON-APPROVABLE CONTENT

- A subject line that reads "Get your samples now" will not be accepted, whereas the subject line 'Product Samples Available' will be approved.
- Subject lines with too many SPAM words will be refused e.g. 'free,' 'order now', etc.
- Subject lines that are too consumer oriented/personal in tone e.g. 'What do you think about x?,' 'Have you heard of x?' or "Doctor, are you aware that?"

Graphics/Visuals

Graphics/visuals will be reviewed for the following:

- Placement
- Size & Proportions
- Nature

Visuals, graphs, photographs as part of branding are welcome. However, they may need to be adapted to an email environment. Creative that is suited for journal ads, websites, etc. may not be appropriate for an email environment, where an HCP may view it as simply an “ad.”

EXAMPLES OF NON-APPROVABLE CONTENT

Placement

- A large visual appearing at the top of the email fills the viewing pane with little/no text

Size & Proportion

- Content of the email is significantly overshadowed by the visual
- The visual takes up a disproportionate amount of space in the email in relation to text

Nature

- An image of people hugging in a communication to a Specialist that may overshadow the clinical content

Engagement (Value Added) Elements

Engagement elements are recommended e.g.:

- Patient support resources
- HCP support and resources
- Clinical information
- Webinars
- A sample offer

These elements need to be made clear, prominent and easily accessible within the email. Ideally they should be visible in the viewing pane in order to give an HCP further reason to open/read the email. If there is a reason to engage with the sender of the email, it is recommended that it be a focus for the content and layout.

Specialist Audience

In most cases a Specialist audience will be small in number i.e. 200-500 physicians and it becomes critical to ensure unsubscribes are minimal as they have great impact for future communications.

The vast majority of Specialists are affiliated with medical schools and are responsible for teaching undergraduates/residents. In particular, emails that try to engage them with a “did you know?” approach are not recommended. Reminder communications may be acceptable if the purpose is clear and the tone is appropriate. Emails that are suitable for GP/FMs may be inappropriate for Specialists.

For these reasons, PTM's review of emails for Specialists will be highly rigorous.

EXAMPLES OF NON-APPROVABLE CONTENT

- An email with the question "Are you aware?"
- Content with language/visuals that are more suited to a consumer/personal environment

Considerations Before Submitting an Email to PTM

- Consider whether the HCP receiving your email in their inbox will find the information of value in this channel or whether it will be a quick delete. Value is challenging to ascertain, however, areas to consider are whether it is educational, clinically relevant, informative and engaging.
- Take into account the personal environments where the email will be opened, for example, during dinnertime, between rounds, between patients etc. and assess whether an unsubscribe will be likely.
- Images and content which was approved by PAAB may still be inappropriate for the email channel.
- Consider that some changes, such as a decrease in the size of an image will only require a note to PAAB, rather than approval. (Confirmed by PAAB)

The Difference Between a PAAB and PTM Review Process



Assesses whether promotional materials meet PAAB's code.

PAAB checks:

- References
- Claims
- Balancing copy
- Misleading copy/images

Gives recommendations/ requirements on visuals, copy, etc.



Only concerned with whether an email will cause an HCP to unsubscribe.

PTM considers:

- Is there a clinical value to the HCP?
- Is there a value-add/engagement element?
- Is the most important clinical information in the viewing pane?
- What are the proportions of the photo in relation to the text?

We take this opportunity to thank our partners, agencies and clients for their understanding and support as we collaborate to create a streamlined process and improve communications to HCPs .