

## **COMPLAINANT v PFIZER**

### **Access to 'hidden' page on company website**

A complainant, who described him/herself as a concerned UK health professional, provided a screenshot of a page from the Pfizer Limited website (Pfizerpro) about Sayana-Press (medroxyprogesterone acetate suspension for injection). The screenshot showed options to click for two 'Useful Resources', ie 'Order materials' or 'Sayana-Press Patient website'. The complainant noted that there was no link to the prescribing information on the page. Sayana-Press was indicated for long-term female contraception.

The detailed response from Pfizer is given below.

The Panel noted Pfizer's submission that, when accessed as intended, all elements of the Sayana-Press microsite on the Pfizerpro website met the requirements for provision of prescribing information as set out in the Code. The Panel noted that the Sayana-Press microsite homepage provided by Pfizer stated 'Product information and a link to the SPC is available at the bottom of the page' and the prescribing information was provided at the bottom of each of the four pages of the microsite by way of the cost, legal category and a link to the summary of product characteristics. The Panel noted that the two 'Useful Resources' links identified by the complainant could be seen populating a tile at the bottom right of the Sayana-Press microsite homepage and, according to Pfizer, these links pointed to an external material ordering site and a standalone Sayana-Press patient support website.

The Panel noted Pfizer's explanation that a hidden list page for 'Useful Resources' was automatically created and populated by the website for the eventuality that there were more than four links added to the 'Useful Resources' tile and a 'See All' option was required to view all of the links. As the Sayana-Press 'Useful Resources' list comprised only two links, no 'See All' option was included within the tile and the hidden list page was not accessible within the website. Therefore, given the hidden page highlighted by the complainant could not be accessed from anywhere within the Sayana-Press microsite on the Pfizerpro website, the page did not include prescribing information. The Panel noted Pfizer's submission that prior to this complaint, it was not aware that Google could access the hidden list page for the Sayana-Press 'Useful Resources' and provide a direct link to that hidden page in its search results, instead of linking to the Sayana-Press homepage which included the 'Useful Resources' tile and prescribing information.

The Panel considered that, on the balance of probabilities, the complainant had not shown that the page he/she had accessed was intended for health professionals. Although the Panel was concerned that material that did not appear to meet the

requirements of the Code could be accessed directly via a Google search, it seemed reasonable in this case to consider it as material on a hidden company page rather than that which was intended for UK health professionals. The Panel decided that the lack of prescribing information on the hidden page did not amount to a breach of the Code as alleged. No breach was ruled.

The Panel noted that since receiving this complaint and learning of Google's ability to return hidden list pages within its search results, Pfizer had limited the 'Useful Resources' list within the homepage tile to four links and had deleted all hidden list pages within the backend of the website. Pfizer had also re-indexed the website on Google to ensure that any historical links to the deleted pages were also removed. In the Panel's view, this case illustrated that companies should exercise extreme caution and wherever possible ensure that pages which were not intended for viewing on their websites were either deleted or securely hidden from view and thus inaccessible.

Given its comments and ruling above, the Panel did not consider that Pfizer had failed to maintain high standards. No breach of the Code was ruled.

A complainant, who described him/herself as a concerned UK health professional, complained about the absence of a link to the prescribing information for Sayana-Press (medroxyprogesterone acetate suspension for injection) on a Pfizer Limited website (Pfizerpro).

Sayana-Press was indicated for long-term female contraception.

## **COMPLAINT**

The complainant provided a screenshot from which it appeared that he/she had searched Google for 'pfizer pro' and was presented with the PfizerPro website and a list of sections from the site; he/she clicked on the option 'Using Sayana-Press' and after selecting that he/she was a health professional, he/she was sent through to a promotional page. A screenshot of the page, provided by the complainant, showed options to click for two 'Useful Resources', ie 'Order materials' or 'Sayana-Press Patient website'. The complainant noted that there was no link to the prescribing information on the page.

When writing to Pfizer, the Authority asked it to consider the requirements of Clauses 4.1 and 9.1 of the Code.

## **RESPONSE**

Pfizer explained that the Sayana-Press microsite consisted of four pages of product information hosted within the Pfizerpro promotional website. An annotated screenshot of the homepage for the Sayana-Press microsite was provided. Prescribing information for Sayana-Press was provided at the bottom of the homepage page where the price and legal category of the product were stated, and a link was provided to the Sayana-Press summary of product characteristics (SPC) (copy provided). Prescribing Information was provided in that format at the bottom of all four pages of the Sayana-Press microsite. Pfizer submitted that provision of prescribing information in that way was consistent with the requirements set out in the company's relevant policy documents (copies provided).

Pfizer stated that the two 'Useful Resources' links identified by the complainant could be seen populating a tile at the bottom right of the Sayana-Press microsite homepage (copy provided). These links pointed to an external material ordering site and a standalone Sayana-Press patient support website. A hidden list page for 'Useful Resources' was automatically created and populated by the website for the eventuality that there were more than four links added to the 'Useful Resources' tile and a 'See All' option was required to view all of the links. As the Sayana-Press 'Useful Resources' list comprised only two links, there was no 'See All' option included within the tile and the hidden list page was not accessible within the website. Given that this page could not be accessed from anywhere within the Sayana-Press microsite, the page did not include prescribing information.

Pfizer stated that it believed that all elements of the Sayana-Press microsite, when accessed as intended, met the requirements for provision of prescribing information as set out in Clause 4.1.

Pfizer stated that it did not control which specific pages of the published Pfizerpro website were highlighted in the results of a Google search for 'pfizer pro' as carried out by the complainant. This was instead determined by the volume of traffic to each page within the site. During the recent lockdown Pfizer had noted a more than 300% increase in health professional visits to the Sayana-Press microsite, as the NHS had recommended use of self-injectable contraception as a way of reducing patient visits to GP practices and clinics. Pfizer believed this increased microsite traffic might have caused Google to highlight the Sayana-Press microsite in the complainant's results when searching for 'pfizer pro'. Pfizer understood, before receiving this complaint, that a Google search would only return links to the public pages of its website. If there had been increased usage of the 'Useful Resources' links within the Sayana-Press microsite, Pfizer expected the Google search results to have included a link to the Sayana-Press microsite homepage containing the 'Useful Resources' tile. Pfizer had now learnt that Google was able to access the hidden list page for the Sayana-Press 'Useful Resources' and provide a direct link to that hidden page in its search results, instead of linking to the Sayana-Press homepage and the 'Useful Resources' tile. Pfizer had not previously known that Google could do that and so it believed that the company had taken all reasonable steps to ensure that the intended pages of the Sayana-Press microsite complied with the requirements of Clause 4.1.

Pfizer stated that all pages of the Sayana-Press microsite sat behind the Pfizer self-validation pop-up which required visitors to confirm their health professional status before accessing the content of the site. If visitors did not confirm that they were health professionals, they were redirected to the Pfizer.co.uk general public website. Details of the self-validation pop-up box were provided.

In terms of corrective action, Pfizer stated that since receiving this complaint and learning of Google's ability to return hidden list pages within its search results, it had limited the 'Useful Resources' list within the homepage tile to four links and had deleted all hidden list pages within the backend of the website. Pfizer had also re-indexed the website on Google to ensure that any historical links to the deleted pages were also removed. Pfizer believed that these actions would ensure that no further issues of this nature could occur in the future.

In conclusion, Pfizer stated that it had taken all reasonable steps to ensure that all of the accessible pages of the Sayana-Press microsite contained and linked to the relevant prescribing information and thus met the requirements of Clause 4.1. On receipt of this complaint and learning that the Google search function could return links to hidden pages of the website, Pfizer

acted quickly to remove the hidden list pages from the site. Pfizer believed that its management of the Sayana-Press microsite and its actions on receipt of this complaint maintained high standards and it did not believe that this situation represented a breach of Clause 9.1.

## **PANEL RULING**

The Panel noted Pfizer's submission that, when accessed as intended, all elements of the Sayana-Press microsite on the Pfizerpro website met the requirements for provision of prescribing information as set out in Clause 4.1. The Panel noted that the Sayana-Press microsite homepage provided by Pfizer stated 'Product information and a link to the SPC is available at the bottom of the page' and the prescribing information was provided at the bottom of each of the four pages of the microsite by way of the cost, legal category and a link to the SPC. The Panel noted that the two 'Useful Resources' links identified by the complainant could be seen populating a tile at the bottom right of the Sayana-Press microsite homepage and, according to Pfizer, these links pointed to an external material ordering site and a standalone Sayana-Press patient support website.

The Panel noted Pfizer's explanation that a hidden list page for 'Useful Resources' was automatically created and populated by the website for the eventuality that there were more than four links added to the 'Useful Resources' tile and a 'See All' option was required to view all of the links. As the Sayana-Press 'Useful Resources' list comprised only two links, there was no 'See All' option included within the tile and the hidden list page was not accessible within the website. Therefore, given the hidden page highlighted by the complainant could not be accessed from anywhere within the Sayana-Press microsite on the Pfizerpro website, the page did not include prescribing information. The Panel noted Pfizer's submission that prior to this complaint, it was not aware that Google could access the hidden list page for the Sayana-Press 'Useful Resources' and provide a direct link to that hidden page in its search results, instead of linking to the Sayana-Press homepage which included the 'Useful Resources' tile and prescribing information.

The Panel considered that, on the balance of probabilities, the complainant had not shown that the page he/she had accessed was intended for health professionals. Although the Panel was concerned that material that did not appear to meet the requirements of the Code could be accessed directly via a Google search, it seemed reasonable in this case to consider it as material on a hidden company page rather than that which was intended for UK health professionals. The Panel decided therefore that the lack of prescribing information on this hidden page did not amount to a breach of the Code as alleged. No breach of Clause 4.1 was ruled.

The Panel noted that since receiving this complaint and learning of Google's ability to return hidden list pages within its search results, Pfizer had limited the 'Useful Resources' list within the homepage tile to four links and had deleted all hidden list pages within the backend of the website. Pfizer had also re-indexed the website on Google to ensure that any historical links to the deleted pages were also removed. In the Panel's view, this case illustrated that companies should exercise extreme caution and wherever possible ensure that pages which were not intended for viewing on their websites were either deleted or securely hidden from view and thus inaccessible.

Given its comments and ruling above and the specific circumstances of this case, the Panel did not consider that Pfizer had failed to maintain high standards. No breach of Clause 9.1 was ruled.

**Complaint received**      **12 August 2020**

**Case completed**        **29 March 2021**