

## PetPoint Privacy Policy

At Pethealth Inc., we have been, and continue to be dedicated to protecting your privacy and insuring your personal information is kept current, confidential and secure. With our PetPoint Data Management System (the “**Services**”), we are committed to using your personal information responsibly and follow strict guidelines of confidentiality and security to safeguard your information.

In the course of providing our Services, it is necessary to collect, record, store, process, transmit and otherwise handle your personal information. We take privacy responsibilities seriously and seek to provide fair, secure and appropriate methods for the handling of your personal information. Our policies are consistent with generally accepted privacy and business practices. This Pethealth Privacy Policy (“**Policy**”) complies with applicable laws. We have designated a Privacy Officer to ensure our compliance with Canadian legislation; to receive and respond to any of your questions and complaints, and to deal with any of your requests for access and changes to our files.

By using our Services with PetPoint you consent to Pethealth Inc., its subsidiaries, affiliates, trademarks, brands, and partners contacting you and collecting using and disclosing your personal information for its own use and to third parties/service providers.

### Pethealth’s ten privacy principles

1. **Accountability** At Pethealth we mandate to maintain and protect the personal information under our control and have designated an individual within the company to be accountable for compliance with these principles.
2. **Identifying purposes** We shall identify the purpose of the personal information collected prior to or at the time the information is collected.
3. **Consent** Individual’s consent will be obtained for the collection, use or disclosure of personal information, except where the law provides an exemption.
4. **Limiting collection** The personal information we collect shall be limited only to that which is necessary for the purposes identified.
5. **Limiting use, disclosure and retention** Personal information shall only be used or disclosed for the purposes for which it was collected, unless an individual has otherwise consented or when it is required or permitted by law. Personal information shall be retained only as long as necessary for the fulfillment of these purposes.

6. **Accuracy** Pethealth shall keep personal information as accurate, complete and up-to-date as may be necessary to fulfill the purposes for which it is to be used.
7. **Safeguards** We use the most current electronic and physical safeguards appropriate to the nature of your personal information to insure the privacy and confidentiality of your personal information.
8. **Openness** We will provide information to individuals about our policies and procedures relating to the management of personal information that is under our control.
9. **Individual's access** On written request to our Privacy Officer, an individual will be informed of the existence, use and disclosure of their personal information that is under our control, and may be given access to that personal information as required and permitted by law. Individuals are entitled to challenge the accuracy and completeness of that personal information and request that it be amended, if appropriate.
10. **Handling enquires or complaints** Any questions or enquires concerning compliance with our privacy policies and procedures may be addressed to our Privacy Officer.

### **Why we collect and use personal information**

Collecting personal information about you is essential to our being able to provide you with the products and services that best meet the needs of you and your pet. While the personal information we collect may come directly from you, by registering with our Services, you authorize Pethealth to collect information provided by our affiliates or other third parties (such as employers, insurance brokers or agents, credit organizations, veterinarian professionals, etc). Your decision to withhold information may limit or affect the quality of Service that we can provide to you.

Pethealth limits the collection of your personal information to that which is necessary for the Services that we provide, to market other services that may be of interest to users, and to comply with our regulatory and legal obligations. Pethealth will not disclose your personal information to any third party for any other purpose except as identified in the Policy. In the event that your personal information is used or disclosed for any purposes not reasonably related to the Services, we will first obtain your consent for such purpose, except where prohibited by law. The personal information that we collect may be used:

- To verify your identity
- To carry out the Services requested by you

- To determine your eligibility for products and services
- To understand and access your ongoing needs and offer products and services to meet those needs
- For billing and accounting services relating to our products and services
- For customer communication, service and administration
- For internal, external and regulatory audit purposes
- To comply with legal and regulatory requirements

### **Consent to use personal information**

Your consent may be obtained in various ways. We may obtain your express consent or we may determine that consent has been implied by the circumstances. Express consent could be in writing, or verbally in person or over the phone. When we receive personal information from you through our website, by phone or by mail that enables us to provide you with a requested product or service, you consent to allow us to deal with that personal information in a reasonable manner.

Providing us with your personal information is always your choice. When you request services from us, we ask that you provide information that enables us to respond to your request. In doing so, you consent to our collection, use and disclosure to appropriate third parties/service providers of such personal information for these purposes. You also authorize us to use and retain this personal information for as long as it may be required for the purposes described. Once your personal information is no longer required, or on your request, we shall take reasonable steps to destroy our records.

Your consent remains valid even after the termination of our relationship with you unless you provide us with written notice that such consent is withdrawn. By withdrawing your consent, or not providing it in the first place, you may limit or even prevent us from being able to provide you with the products or services desired.

In certain circumstance, consent cannot be withdrawn such as where personal information is required for policy issuance or renewal, insurance underwriting or claims administration of current policies. There are also legal exceptions where we will not need to obtain consent or explain the purposes for the collection, use of disclosure of personal information.

### **Information sharing**

We will not sell client lists or personal information to others for direct marketing purposes. In accepting the Services, you give us authority to disclose your personal information to veterinarians, animal shelters and other emergency services personnel who have scanned your pet's microchip and have access to our Services.

We may need to disclose the personal information we collect to affiliates, subsidiaries, partners, successors and other service providers or agents who perform various functions for us. We require any third parties we deal with to implement reasonable privacy and security procedures and practices.

In certain circumstances, we may be required to provide personal information to third parties for legal or regulatory purposes.

We may also use this personal information to assess your future needs and to offer the products and services selected by us that may best meet those needs, from affiliates, reputable organizations with which we have strategic alliances or ourselves. If you do not wish to receive these offers or such information, please contact our Privacy Officer to opt-out using the form below.

### **Keeping information accurate**

It is important that your personal information is accurate and complete. Having accurate information about you enables us to give you the best possible service. We rely on you to keep us informed of any changes, such as a change of address, telephone number or any other circumstances.

You have the right to access, verify and amend the information we have about you. A nominal fee may be charged for this service and, if so, you will be given prior notice of the amount that will be charged.

### **How we safeguard personal information**

At Pethealth, we employ physical, electronic and procedural safeguards to protect our systems and all personal information under our control against unauthorized access and use. All safety and security measures are appropriate to the sensitivity level of the information collected.

Our service providers and agents are required to maintain client confidentiality, and may not use the information for any unauthorized purpose.

Employees are governed by strict standards and policies to ensure that personal information is secure and treated with the utmost care and respect.

### **Changes to this Privacy Policy**

Please note this Privacy Policy will change from time to time. We will post any changes on this page and, if the changes are significant, we will also provide a more prominent notice.

You can address any further concerns you may have regarding Pethealth compliance with privacy law requirements or this Policy to the Privacy Officer at the following address:

Attn: The Privacy Officer, Pethealth Inc.,  
710 Dorval Drive, Suite 400 Oakville, Ontario, L6K 3V7, Canada  
legalcounsel@pethealthinc.com

## PRIVACY CHOICES FORM

If you prefer that we limit disclosures of personal information about you, as described in the PetPoint Privacy Policy, please complete this form. Our records will be revised to reflect your preferences as indicated below:

- Remove my personal contact information from your marketing lists shared with affiliates in different lines of business.

In order for us to process your request, please provide the following information:

- Your name** \_\_\_\_\_
- Your username** \_\_\_\_\_
- Your email address** \_\_\_\_\_
- Your telephone number** \_\_\_\_\_

Please print this form and either or mail or email it to:

Attn: The Privacy Officer, Pethealth Inc.,  
710 Dorval Drive, Suite 400 Oakville, Ontario, L6K 3V7, Canada  
legalcounsel@pethealthinc.com

Please allow approximately 30 days from our receipt of this form for your instructions to become effective.