

## Remedy Holdings Inc. – Privacy Statement

LAST UPDATE: February 12, 2020

Remedy Holdings Inc. and its pharmacies and affiliates operating under the Remedy'sRx™ brand respect the privacy rights of our customers and employees. For the purpose of this Privacy Statement, unless stated otherwise, all references to “Remedy'sRx”, “Remedy'sRx Specialty Pharmacy” “RHI” or “we” include Remedy Holdings Inc., as well as its affiliates and subsidiaries that are operators of retail and specialty pharmacies in Canada.

This Privacy Statement provides answers to common questions regarding our practices and our relationships with the third parties who may have access to your personal information. If you do not see an answer to your question, please contact our Privacy Officer by one of the means listed below.

This Privacy Statement applies to the collection, use and disclosure of personal information in the course of all commercial dealings with RHI and applies to the use of any website or mobile application maintained by RHI. Websites include the [remedyrxsp.ca](http://remedyrxsp.ca) website, and any other websites and applications that may be developed in the future on which this Privacy Statement is posted with our permission.

If we alter our Privacy Statement, any changes will be posted on the company webpage [remedyrxsp.ca](http://remedyrxsp.ca) so that you are always informed of the personal information that we collect about you, how we use it and the circumstances under which we may disclose it. Please check back from time to time to ensure you are aware of our current policies.

### What is personal information?

Personal information is information about an identifiable individual. This includes your name, date of birth, email address, purchase history as well as your personal health information. Personal health information includes information about your health, who your healthcare providers are, what prescriptions you have filled and other health information collected and created by your pharmacist.

### Why does RHI collect personal information?

RHI uses personal information for a number of purposes, including as follows:

**Treatment:** We collect personal information to provide you with pharmacy or health-related services. We may use your information to co-ordinate care your care. Health professionals such as pharmacists, using their professional judgment, may disclose to your health care provider or representative that is involved in your care. For example, we may need to speak with your doctor regarding your prescription for clarification purposes or with your substitute decision-maker if you are not capable of providing consent.

**Compliance and Safety:** In order to provide you with quality health care and in compliance with existing federal and provincial legislation, we keep a record of the medications dispensed to you and the health services provided to you by our pharmacy. We also include in our records any relevant health information that we require to ensure that you are not given, or advised to take, a medication that is not appropriate for you.

**Payment & Accounting:** We use your personal information to process payments for the medications and other products you receive. For example, we need to give information about prescriptions we have filled for you to your health plan, to obtain payment. We also keep records of purchases to satisfy accounting and tax obligations.

**Pharmacy Communications:** We need your personal information to send you refill reminders such as e-mail reminders or information about treatment alternatives, events with our partners, or other health-related benefits and services that may be of interest to you.

**Product and Services Communications:** Unless you opt-out, we use your personal information to tell you about or recommend other products and services that may be of interest to you.

**Incident Reporting:** If you contact us regarding your experience in using one of our products or services, we use the information you provide in submitting reports to applicable authorities such as Health Canada (if required), and as otherwise required of us by law. We also use the information to contact your pharmacist or prescribing physician to follow up regarding an unexpected event involving use of a product dispensed by, or purchased at, a Remedy'sRx pharmacy.

**Video Surveillance:** Our pharmacies may be equipped with video surveillance that will collect your image. We use video surveillance for security purposes and to understand foot and vehicle traffic patterns at our locations.

## **Is your personal information safe?**

Physical, electronic, and managerial procedures to safeguard and help prevent unauthorized access, maintain data security, and correctly use your personal information and have clearly defined internal policies and practices. We apply security safeguards appropriate to the sensitivity of the information, such as retaining information in secure facilities and making personal information accessible only to authorized employees on a need-to-know basis.

Your personal information is stored on our database servers or hosted by third parties who have entered into agreements with us that require them to safeguard your personal information. We have implemented technological measures to prevent individuals from accessing personal information without authorization. Data centers are designed to be physically secure and protected from unauthorized access by unauthorized persons.

Although we will make reasonable efforts to protect personal information from loss, misuse, or alteration by third parties, you should be aware that there is always some risk that an unauthorized third party could find a way to thwart our security systems. Where you use passwords, ID numbers, or other special access features, it is your responsibility to safeguard them.

## **What personal information does RHI collect and use?**

If you use our pharmacy services, we collect include such as prescription information (e.g. patient, medication and prescriber information), health information (e.g. allergies and medical conditions) and insurance information. In order to provide you with quality health care and in compliance with existing federal and provincial legislation, we keep a record of the medications dispensed to you or services provided to you at our pharmacy. We also include in our records any relevant health information that we require to ensure that you are not given, or advised to take, a medicine that is not appropriate for you.

**RHI also collects personal information for various purposes, such as to:**

- provide pharmacy and other healthcare related services;
- record your instructions regarding authorized representatives or persons who may pick up your prescriptions;
- process payments, including benefits claims;
- communicate with individuals involved in your care or the payment of your care;
- provide health-related education communications;
- communicate products and services;
- manage the business;
- understand our customers' needs;
- business innovation; and
- detect and deter fraud and other contraventions of law.

We may collect personal information that you share with us on social media sites and when you interact with our websites, online/mobile applications and online advertising. Advertising networks, analytics providers and other third parties may provide information about the search terms you used, the ads provided by us that you clicked on or the pages you visited while on our sites. Although we sometimes use interest-based or personalized advertising, we do not use your pharmacy purchases or other sensitive health information for the purposes of advertising.

Our websites, online advertising and emails may contain technologies that allow us to track you across website pages or let us know when you have interacted with our advertising or emails. These technologies include cookies, web beacons, and pixel gifs. These technologies are used to help us understand what actions you take and assist us in providing you with content specific to your region and language preference. You may delete or disable certain of these technologies, such as cookies, at any time by changing your browser settings to reject cookies. You may opt-out of web beacons and pixels through third-party services such as [www.youradchoices.ca](http://www.youradchoices.ca).

**How does RHI obtain your consent?**

By using our services or visiting our properties, websites or online applications you agree that we may collect, use and disclose your personal information in accordance with this Privacy Statement.

You can withdraw your consent to allow us to collect your personal information. However, we must still comply with all the provincial laws that require us to keep records of medications we dispense to you. If you choose to not give us consent to disclose certain personal information, we may not be able to provide you with the full range of pharmacy services. For example, if you do not want us to communicate with a benefits provider, you may be required to pay for your prescription and send the information required for reimbursement directly to your pharmacy benefits plan.

**RHI may collect, use and disclose personal information without your consent in limited circumstances permitted by law. These situations include (but are not limited to) the following:**

- we receive a court order, subpoena, or search warrant or we are otherwise required by law to disclose the information;
- we are sharing your information with law enforcement or others (if permitted by law) for the purposes of reporting an actual or suspected breach of law or a contact or we are asked to do so by a governmental institution who has lawful authority to obtain this information;
- consent cannot be obtained in a timely way and the collection is clearly in your interest;
- there is an emergency that threatens the life, health or security of an individual;
- we are sharing the information with another organization, such as health benefits providers, to detect, prevent or deter fraud; and
- your next of kin or authorized representative needs to be notified that we have reasonable grounds to believe that you may be the victim of financial abuse.

**Does RHI use service providers?**

We have relationships with different agents and third-party service providers who help us provide services to you, administer our business, including designing, maintaining and improving our products, our services, our computer systems and our computer security. We also use third parties to analyze data collected on our websites and mobile applications. When we allow a third-party service provider to have access to your personal information, they will only be permitted to use it for purposes that are consistent with this Privacy Statement and the purposes for which your personal information was collected. Please contact the Privacy Officer (contact information listed below) if you have any questions.

**How long does RHI keep your personal information?**

We will retain your personal information for the period of time that is required by law or otherwise required to fulfill the purpose for which you provided it to us.

**Could your personal information be sold or transferred in a business transaction?**

In accordance with Canadian privacy laws, we may disclose your personal information in connection with the financing, sale, assignment, reorganization or other transfer or change of corporate control of all or part of our business. If your personal information is disclosed in connection with a business transaction, we will require the recipient to use and retain it in accordance with the purposes for which it was collected.

**How do you obtain access to your personal information?**

You have the right to access, update, and correct your personal information in our custody and control, subject to certain exceptions prescribed by law. You may request to access, update and correct inaccuracies in your personal information by means of a written request to the pharmacy location at which service has been received.

Our pharmacy staff may request certain personal information for the purposes of verifying the identity of any individual seeking access to their records.

## **How do you contact the Privacy Officer?**

If you have any questions about the Privacy Statement or the handling of your personal information, please contact the Privacy Officer at:

### **Privacy Officer**

Jeff May

Remedy Holdings Inc.

675 Cochrane Drive

North Tower, Suite 110

Markham, Ontario

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[privacyofficer@remedysrxsp.ca](mailto:privacyofficer@remedysrxsp.ca)