

## PRIVACY POLICY

### A. Introduction

1. **Definitions:** In this Privacy Policy (the “Privacy Policy”), the terms “you”, and “your” refer to our customers, website visitors and application users. The term “we”, “our” and “us” refer to Pharmasave Drugs (National) Ltd. and our affiliates.
2. **Our Responsibility:** At Pharmasave, your wellness is our priority. We take great pride in providing you with the most complete health and wellness services, products and opportunities. The same applies to making sure that the information you pass on to us remains private. We have always safeguarded your health and personal information with utmost care. This policy outlines our procedures and guidelines that we follow to make sure we do not break this trust.
3. **Your Responsibility:** You are responsible for keeping your information safe. Be responsible and cautious whenever you offer your personal information. You should ensure that whenever you disclose personal information, that information is used in an appropriate manner and stored safely.
4. **Your Consent:** By submitting your information to us, you consent to us collecting, storing, using, sharing and disclosing the personal information submitted as indicated in this Privacy Policy.
5. **Modifications to Policy:** We regularly review all our policies and procedures, and we reserve the right to change this Privacy Policy at any time, and from time to time, by posting a modified Privacy Policy. If you disagree with any of the changes to our Privacy Policy, contact us to manage any personal information that you have already provided to us.
6. **Information from Children:** Although we do not actively solicit personal or other information from children under the age of 13, it is possible for children to disclose their personal information to us. If you are under 13 years of age and would like to participate in our programs and are eligible to participate, please ask your parent or guardian for assistance. If you are under the legal age of majority in the province/territory in which you reside and want to register for any Pharmasave account, you may only do so with the consent of your parent or guardian and that parent or guardian will have access to your information available through your account.
7. **Personal Information Collected:** We may ask for personal information about you (limited to information that is reasonable to fulfill the purposes for which it was collected) including name, telephone numbers, age-range, birth date, email, postal address, postal code, location and information about products that you purchase in our retail stores and online . From time to time, we may ask you for other information such as general demographic, family or personal health information or your interests. We only collect personal information if we ask you, and obtain your consent to its use, or if your consent is implied through your conduct with us since the purpose of the collection, use or disclosure is obvious and you voluntarily provide the information, or if our collection, use and disclosure of the personal information is required or authorized by law to be done without your consent.

We do not collect any personally identifiable information unless you provide it to us or authorize a third party to provide it to us. If you do not want us to collect your personal information, please do not provide it.
8. **Profile Information:** If you register with our website or any of our applications, such as to receive newsletters, eFlyers, health and wellness information, news updates or other information from us, or if you register with our website or application for an

eCare account, such as to have access to your medication records, request online prescription refills or view your current and historical prescriptions, or if you register with an ecommerce account, you will receive a password and account designation when you have completed the profile information. You agree to provide true, accurate and complete information about yourself. You are responsible for managing your account, including but not limited to maintaining the confidentiality of passwords and/or any of your account information. You are also responsible for maintaining and promptly updating your account information to keep it true, accurate, current and complete. You are responsible for all activities that occur under your password or on your account. Any person who has access to your account credentials may be able to access any of the personal information available in your account, including if you share your account credentials with a health care provider. In the case of your eCare account, your registration code should also be treated as your account credentials, as it may be possible for someone to use your registration code to access your personal information available in your eCare account.

## B. Scope and Application

1. This Privacy Policy applies to personal information, including personal health information, about Pharmasave customers, website visitors and application users that is collected, used or disclosed by us.
2. This Privacy Policy applies to the management of personal information in any form, whether electronic or written.
3. This Privacy Policy does not apply to information regarding our corporate customers. However, such information is governed by other Pharmasave policies, practices and contractual arrangements.
4. Each Pharmasave store is independently owned and operated under license. This Privacy Policy does not apply to independent Pharmasave stores or to regional Pharmasave licensors. Consent given at a Pharmasave store pertains to your personal information given at that store. From time to time, Pharmasave stores participate in nationally managed promotions or programs (such as eCare or eCommerce programs) and personal information may be transferred to Pharmasave Drugs (National) Ltd. and/or our regional Pharmasave licensors, in which case this Privacy Policy will apply to the information transferred. For information about any store's policy about personal information pertaining to you, including information collected through a store's website, kindly contact that store directly.
5. This policy does not apply to the practices of companies or other entities that we do not manage or control. This policy does not apply to information regarding corporations or other non-individuals.

## C. Use and Sharing of Information

### **WEBSITES AND APPLICATIONS OPERATED BY PHARMASAVE DRUGS (NATIONAL) LTD.:**

1. When you create an online account through [www.pharmasave.com](http://www.pharmasave.com), you agree that we may provide you with our newsletter, eFlyer, promotions, health and wellness information and news updates. We send you only the information you have consented to receive. You can unsubscribe to any electronic communication from our websites at any time by using the "unsubscribe" or "opt out" mechanism included with the communication.

2. In registering for an eCare account on our website or applications, your pharmacist and you will be providing us with personal information about yourself, including your personal health information, such as your prescriptions, medical history, and your requested pick-up pharmacy location. We will collect and use all information provided by you in connection with your registration for and use of the website or applications to provide you with services in accordance with the Terms of Use, and to administer, maintain and improve the functioning of our website or applications, including providing you with personalized health information. When you request a new prescription or refill or to transfer your existing prescription, we will forward this information to your selected pharmacy location and the request will be processed in the same manner and upon the same timelines as requests presented in store. Filling or transferring your prescription may require disclosure of that information to the prescribing physician, other health service providers or health insurers. In the event that technical support is required, your personal information may be accessed by authorized third parties to provide technical support. By submitting a request for a person other than yourself, you represent that you have all necessary consent and authority to make such request on behalf of the other person.
3. In registering for an eCommerce account on our website or applications, you will be providing us with personal information including personally identifiable information such as name, address, email address and phone number. We will collect and use all information provided by you in connection with your registration to provide you with services in accordance with the Terms of Use, and to administer, maintain and improve the functioning of our website or applications.
4. We will collect information from you when you make a purchase on the Pharmasave Online Store, whether or not you register for an account. This information is collected by Pharmasave to process and fulfill your online transaction(s), which ensures that your purchased goods are shipped to the correct address, in addition to contacting you as needed with connection to your order. In the event that technical support is required, your personal information may be accessed by authorized third parties. But placing an order for a person other than yourself, you represent that you have all necessary consent and authority to make such requests on behalf of the other person.
5. Pharmasave does not collect your payment or financial information. For e-commerce, our third party payment processor uses your payment information to approve or decline a purchase. At no time does Pharmasave have access to your personal credit card or payment information.
6. We may also use your personal information to generate summarized data for internal use and for tailoring the information we provide via our website or applications, newsletters, eFlyers, and updates. "Summarized data" means information which has been aggregated and analyzed to provide us with generalized, anonymous information. Your identity and personal information will be kept anonymous in summarized data.
7. We cannot guarantee the confidentiality or security of any email communications or information sent by you to us via our website or applications. If you wish to send us confidential information, please notify us first to make arrangements.
8. Our website and applications may contain links to other sites, which are not governed by this Privacy Policy. You should read the individual privacy policies of such websites and applications, and make an informed decision whether or not to use these sites based upon their privacy practices.
9. Like most other commercial websites and applications, our website and applications may monitor traffic patterns, downloads, site usage and related site information. We may automatically (i.e., not via registration) collect or compile certain information that is

not personally identifiable when you access the website or applications. Examples of this type of information include the aggregate and unique number of visitors to the website, the dates and times of visits to the website, the city, province and country of visitors, the pages of the website visited and the content accessed, the browsers, operating systems, search engines and search terms used to visit the website and HTTP errors generated. We use this information in order to optimize our website and to assess usage of our website or applications. We may provide such information to our website or application contractors for these purposes, but this information does not include any personally identifiable information.

10. We are committed to providing personalized products and services to you. In order to do so, we use cookies to store information about you. A cookie is a small amount of text that is sent to your browser from a web server and stored on your computer's hard drive. We use cookies to tell us that you have visited our site before. They are simply to help us simplify and enhance your experience on our website or applications.

**GENERAL:**

1. We use your information to provide you with health information, tools and resources, to fulfill an online purchase of products, to administer and build your account with us, to market new products or services that we believe will be of interest to you, for general research and opinion studies, or as required or authorized by law. We also use the information collected to monitor and improve our internal programs and operations. We may copy, distribute, display, transmit, prepare derivative works from or otherwise use the information only in accordance with this Privacy Policy, as required or permitted by applicable laws, and as directed by you.
2. We do not sell your personal information to any other third party without your permission. We take reasonable precautions regarding any sensitive information or security information, such as contact information, health information, etc.
3. We may also contract with a third party, such as TELUS Health Solutions Inc., to store, process, or host our online data, which may include your personal information for the purpose of providing services to you or to Pharmasave and you hereby consent to such storage, processing, and hosting of your personal information. We will only do so if we are satisfied that the third party is a reputable and reliable service provider, and we will not grant third parties unauthorized access to your personal information.
4. Under certain circumstances, we will disclose your personal information: when you have consented to the disclosure; to fulfill the purpose for which the personal information was collected; when the services we are providing to you require us to give information to third parties; if the information is already publicly known; in connection with an actual or proposed sale, reorganization or financing of our business or operations, including to regulatory authorities or to prospective buyers and other parties to the transaction who are bound by confidentiality obligations, and when we are required or authorized by law to do so.
5. Periodically, we may conduct surveys and contests through one of our websites or applications, email or in Pharmasave stores. You may choose to participate and provide us your name, mailing address, telephone number, email and other personal information. We collect this information for contests to select and notify the winner. Personal information obtained in a survey will be used to understand needs and preferences of our customers.
6. Personal information will be retained in accordance with this Privacy Policy only for as long as may be necessary or relevant for the identified purpose of collection, or as may be required or permitted by law, after which time it will be made anonymous or destroyed unless you further consent to its continued retention. Information that you

may provide to us that is in excess of what is necessary for the identified purpose of collection may not be retained by us.

#### D. Correcting Personal Information

You may request a copy of your personal information that is in our control and request corrections if you believe that personal information is inaccurate. If you wish to access your personal information you should contact us using the contact information at the bottom of this Privacy Policy and we will be pleased to discuss with you how we can limit collection, use or disclosure of your personal information.

#### E. Principles

To demonstrate our commitment to your privacy, we adhere to the following principles derived from the **PERSONAL INFORMATION PROTECTION AND ELECTRONIC DOCUMENTS ACT (Canada)**:

1. **Accountability:** We are responsible for personal information under our control and designate an individual or individuals who are accountable for our compliance with the following principles.
2. **Identifying Purposes:** The purposes for which personal information is collected are identified by us at or before the time the information is collected. The purpose may be identified orally or in writing.
3. **Consent:** Your knowledge and consent is required for the collection, use or disclosure of your personal information, except as required or permitted by applicable law.
4. **Limiting Collection:** The collection of personal information is limited to that which is necessary for the purposes identified by us, or as required or permitted by applicable law. Information will be collected by fair and lawful means.
5. **Limiting Use, Disclosure, and Retention:** Personal information is not used or disclosed for purposes other than those for which it was collected with your consent or as required or permitted by applicable law.
6. **Accuracy:** Personal information is maintained as accurate, complete, and up-to-date as is necessary for the purposes for which it is used.
7. **Safeguards:** We are committed to keeping your personal information safe in order to protect it from loss, theft, unauthorized access, disclosure, duplication, use by others and modification. Your personal information is protected by reasonable security safeguards appropriate to the sensitivity of the information. We use appropriate measures when disposing of the information.
8. **Openness:** We make readily available to you specific information about our policies and practices relating to the management of personal information, such as the terms of this Privacy Policy.
9. **Individual Access:** You have the right to access your personal information collected by us. Upon request, within a reasonable time, we will tell you what personal information belonging to you is stored by us, what it is being used for and who possesses access to it. You may notify us in writing at our contact address of the accuracy and completeness of the information and have it amended as appropriate.
10. **Addressing Compliance:** At Pharmasave, we want to ensure our procedures support our Privacy Policy, and our actions safeguard your privacy. If you have a concern, kindly contact us in writing at the Contact Address.

#### F. Contact Information

Pharmasave Drugs (National) Ltd.  
Attention: Privacy Officer  
8411 – 200th Street, Suite 201  
Langley, B.C.  
Canada, V2Y 0E7

Phone: 604.455.2400

Toll Free: 800.661.6106

Fax: 604.455.2493

Email: [info@bc.pharmasave.ca](mailto:info@bc.pharmasave.ca)

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