

# Range Road Veterinary Clinic Privacy Policy

Last modified: April 4, 2022

## INTRODUCTION

**2096239 ALBERTA LTD.** (“**Range Road Vet,**” “**Us,**” or “**We**”) operates a platform provides information about Range Road Veterinary Clinic and veterinary products and services (accessible at [rangeroadvet.com](http://rangeroadvet.com)) (the “**Platform**”). Range Road Vet offers veterinary services (collectively, “**Vet Services**”). Veterinary products may be purchased from the Platform (each a “**Vet Product,**” and collectively, “**Vet Products**”).

Range Road Vet respects your privacy and is committed to protecting it by complying with this policy. We take steps to ensure that the Personal Information (as defined below) that we collect about you is adequate, relevant, not excessive, and used for limited purposes. Our privacy practices are consistent with the 10 Fair Information Principles and adherent to applicable federal, provincial privacy and health privacy laws.

### **This policy describes:**

- How we collect, use, disclose, and protect the Personal Information of our customers and platform users (“**you**”).
- The types of information we may collect from you or that you may provide when you visit our Platform.
- Our practices for collecting, using, maintaining, protecting, and disclosing Personal Information.

BY ACCESSING OUR PLATFORM, YOU AGREE AND CONSENT TO THIS PRIVACY POLICY AND ANY POLICIES REFERENCED HEREIN INCLUDING OUR TERMS OF USE (ACCESSIBLE AT [RANGEROADVET.COM/TERMS](http://RANGEROADVET.COM/TERMS)). IF YOU DO NOT WANT US TO COLLECT, USE OR DISCLOSE YOUR PERSONAL INFORMATION, DO NOT ACCESS OUR PLATFORM OR SHARE YOUR INFORMATION WITH US.

## INFORMATION WE COLLECT ABOUT YOU

We collect and use several types of information from and about you, including but not limited to:

- **Personal Information**, that we can reasonably use to identify you directly or indirectly, such as your name, mailing address, e-mail address, telephone number, your animal’s name, information about your animal, Internet protocol (IP) address used to connect your computer to the Internet, username or other similar identifier, billing and account information, and any other identifier we may use to contact you. (“**Personal Information**”). Personal Information includes Personal Health Information (as defined below) but does not include de-identified or aggregated information that cannot be associated with a particular individual.

- **Non-personal information**, that does not directly or indirectly reveal your identity or directly relate to an identifiable individual, such as demographic information, or statistical or aggregated information. Statistical or aggregated data does not directly identify a specific person, but we may derive non-personal statistical or aggregated data from Personal Information. For example, we may aggregate Personal Information to calculate the percentage of users accessing a specific Platform feature.
- **Technical information**, including your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, or information about your internet connection, the equipment you use to access our Platform, and usage details.
- **Non-personal details about your Platform interactions**, including the full Uniform Resource Locators (URLs), clickstream to, through and from our Platform (including date and time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, or any phone number used to call our customer service number.

### **HOW WE COLLECT PERSONAL INFORMATION ABOUT YOU**

We use different methods to collect your information, including through:

- **Direct interactions with you when you provide it to us**, for example, by filling in forms or corresponding with us via email, electronic, phone and fax interactions.
- **User contributions**. You may also provide Personal Information for us to publish or display on public Platform areas, Range Road Vet social media, or transmit to other Platform users or third parties.
- **Payment Information**, we may collect information when you make purchases through the Platform. Our payment processor does not collect or store credit card information.
- **Cookies and Automated Technologies**, as you navigate through our Platform. Our Platform utilizes “cookies” and similar technologies thus we may automatically collect usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies. We also use marketing analytics providers such as Google Analytics to collect information regarding visitors to our Platform. Certain advertising partners may use our automated collection technologies and cookies to advertise on our behalf. These automated collection technologies and cookies may collect non-personal information which may be used to provide you targeted advertisements within and outside of our Platform.
- **Third parties or publicly available sources**, such as Google reviews, forums, social media and other publicly available sources.

### **HOW WE USE YOUR PERSONAL INFORMATION**

We use Personal Information that we collect about you or that you provide to us, including any Personal Information:

- To verify your identity.
- To present our Platform and facilitate your interactions with our veterinarians and staff.
- To fulfill the purposes for which you provided the information or that were described when it was collected, or any other purpose for which you provide it.
- To allow you to access and if applicable, purchase Vet Services and Vet Products from our Platform.
- To carry out our obligations and enforce our rights arising from any contracts with you, including for billing, payment and collection or to comply with legal requirements.
- To notify you about changes to our Platform or any products or services we offer or provide through it.
- To improve our Platform products or services, marketing, or customer relationships and experiences.
- To measure or understand the effectiveness of the advertising we serve to you and others, and to deliver relevant advertising to you.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may also use your Personal Information to contact you about our own and third-parties' goods and services that may be of interest to you, as permitted by law. If you do not want us to use your Personal Information in this way, please adjust your user preferences in your account profile or use the unsubscribe mechanism at the bottom of our e-mails. For more information, see Choices About How We Use and Disclose Your Personal Information .

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We do not sell your Personal Information to any third parties. We may disclose Personal Information that we collect, or you provide as described in this privacy policy:

- To our parent, subsidiaries and affiliates and for technical support purposes.
- To contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with Platform improvement and optimization) and who are contractually obligated to keep Personal Information confidential, use it only for the purposes for which we disclose it to them, and to process the Personal Information with the same standards set out in this policy.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your Personal Information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, in accordance with applicable law.

- To enforce or apply our terms of use (accessible at [rangeroadvet.com/terms](http://rangeroadvet.com/terms)) and other agreements, including for billing and collection purposes.
- We contractually require third parties to keep Personal Information confidential and to use your Personal Information only for the purposes for which we disclose it to them. The use, retention, storage, and disclosure of your Personal Information will also be governed by the respective privacy policies of our third-party service providers.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Range Road Vet, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection, patient safety and credit risk reduction.
- In accordance with applicable law, to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Range Road Vet's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by Range Road Vet about our customers and users is among the assets transferred.

### **CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR PERSONAL INFORMATION**

We strive to provide you with choices regarding the Personal Information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Electronic Communications.** You can opt-out of electronic communications via phone call, SMS and email via the unsubscribe link attached to our electronic communications.
- **Cookies and Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this Platform may not be accessible or may not function properly. For further details regarding how to opt-out of cookies and tracking technologies, please read our “Cookies and Tracking” section in this Privacy Policy.
- **Promotional Offers from Range Road Vet.** If we have sent you a promotional electronic communication, you may unsubscribe by clicking the unsubscribe link we have included in the electronic communication. This opt-out does not apply to information provided to Range Road Vet as part of a product purchase, warranty registration, product service experience, or other transactions.

### **CONSENT AND WITHDRAWING CONSENT**

We generally obtain your consent prior to collecting and prior to disclosing your Personal Information. Your consent may be expressed or implied depending on the sensitivity of the information that we are interacting with. We will seek your explicit consent for uses of your Personal Information beyond what is provided in this privacy policy.

Where you have provided your consent to the collection, use, and transfer of your personal information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, contact us at [reception@rangeroadvet.com](mailto:reception@rangeroadvet.com). Please note

that if you withdraw your consent, we may not be able to provide you with a particular product or service and may delete your account. We will explain the impact to you at the time to help you with your decision.

Please note, even if you withdraw consent to the use of your personal information, certain healthcare providers and network pharmacies may be required keep your personal information on file to comply with applicable laws and regulations. Please visit their respective websites to read their privacy policies.

## **COOKIES AND TRACKING TECHNOLOGIES**

### **Information We Collect Through Cookies and Other Automatic Data Collection Technologies**

As you navigate through and interact with our Platform, we may use cookies or other automatic data collection technologies to collect certain information about your equipment, browsing actions. The information that is automatically collected by our cookies and tracking technologies is not Personal Information but it may be associated with Personal Information that is provided to us or collected by us.

We may also use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). To learn more or to opt-out of tailored advertising please visit Digital Advertising Alliance of Canada Opt-Out Tool.

### **Third Party Use of Cookies and Other Tracking Technologies**

Some content or applications on the Platform, including advertisements, are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Platform. The information they collect may be associated with your Personal Information or they may collect information, including Personal Information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioural) advertising or other targeted content.

You can opt-out of several third-party ad servers' and networks' cookies simultaneously by using an opt-out tool created by the Digital Advertising Alliance of Canada. We do not control these third parties' tracking technologies or how they are used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

## **DATA SECURITY AND STORAGE**

The security of your Personal Information is very important to us. We use physical, electronic, and administrative measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. We store all information you provide to us behind firewalls on our secure servers. Any payment transactions will be encrypted using SSL technology.

Your Personal Information is encrypted and stored on third-party cloud servers with data centers that are physically located in Canada. To ensure the availability and safety of your Personal

Information, we may store your Personal Information on third-party cloud servers with data centers outside of Canada as well but only as minimally required.

The safety and security of your Personal Information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Platform, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Platform. Any transmission of Personal Information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Platform.

### **TRANSFERRING YOUR PERSONAL INFORMATION**

We may transfer Personal Information that we collect or that you provide as described in this policy to contractors, service providers, and other third parties we use to support our business (such as analytics and search engine providers that assist us with Platform improvement and optimization) and who are contractually obligated to keep Personal Information confidential, use it only for the purposes for which we disclose it to them, and to process the Personal Information with the same standards set out in this policy.

We may process, store, and transfer your Personal Information in and to a foreign country, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to your Personal Information through the laws of the foreign country. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable Canadian privacy legislation.

### **DATA RETENTION**

Except as otherwise permitted or required by applicable law or regulation, we will only retain your Personal Information for as long as necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any medical, regulatory, legal, accounting, or reporting requirements. Under some circumstances we may anonymize your Personal Information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

### **ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION**

It is important that the Personal Information we hold about you is accurate and current. Please keep us informed if your Personal Information changes. By law you have the right to request access to and to correct the Personal Information that we hold about you.

If you want to review, verify, correct, or withdraw consent to the use of your Personal Information you may also send us an email at [reception@rangeroadvet.com](mailto:reception@rangeroadvet.com) to request access to, correct, or delete any Personal Information that you have provided to us. We cannot delete your

Personal Information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the Personal Information to be incorrect.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the Personal Information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all the Personal Information that we hold about you, or we may have destroyed, erased, or made your Personal Information anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your Personal Information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

Proper access and use of information provided on the Platform, including User Contributions, is governed by our terms of use at [rangeroadvet.com/terms](http://rangeroadvet.com/terms).

### **CHANGES TO OUR PRIVACY POLICY**

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' Personal Information, we will notify you by email to the email address specified in your account and or through a notice on the Platform home page.

We include the date the privacy policy was last revised at the top of the page. You are responsible for ensuring we have an up-to-date, active, and deliverable email address for you, and for periodically visiting our Platform and this privacy policy to check for any changes.

### **CONTACT INFORMATION AND CHALLENGING COMPLIANCE**

We welcome your questions, comments, and requests regarding this privacy policy and our privacy practices. Please contact us at:

Privacy Officer

[reception@rangeroadvet.com](mailto:reception@rangeroadvet.com)

We have procedures in place to receive and respond to complaints or inquiries about our handling of Personal Information, our compliance with this policy, and with applicable privacy laws. To discuss our compliance with this policy please contact our Privacy Officer using the contact information listed above.