



PRO-HEALTH PHARMACY INC.

PRIVACY POLICY

Pro-Health Direct™ highly values the privacy of its customers and takes protecting your information, including your personal information, very seriously. This Privacy Policy sets out the purposes for which we collect, use and disclose personal information about our customers and users of Pro-Health Pharmacy’s website and mobile App.

PLEASE REVIEW THESE TERMS AND CONDITIONS CAREFULLY, THEY CONTAIN BINDING LEGAL OBLIGATIONS.

SCOPE AND APPLICATION

In this Privacy Policy, the terms “Pro-Health Pharmacy”/“pro-healthpharmacy.com”/ “Pro-health.ca”/“Pro-Health Direct”/ “direct.pro-health.ca”/“we”/“us”/“our” refer to Pro-Health Pharmacy Inc. and our affiliates. The terms “you”/ “your”/ “user”/“users”/ refer to our customers, website visitors, and App users. The term “website” refers to our website located at <http://www.pro-health.ca>. The term “App” refers to the Pro-Health Direct™.

Our provision of access to and use of the website and the App are referred to herein collectively as the “Services”. **DO NOT ACCESS OR USE THE WEBSITE OR THE APP IF YOU DO NOT AGREE TO THE TERMS OF THIS PRIVACY POLICY.**

British Columbia’s *Personal Information Protection Act* (“PIPA”) sets out how B.C. businesses may collect, use and disclose personal information. “Personal Information” means information about an identifiable individual, such as a user’s name, age, home address and phone number, social insurance number, marital status, religion, income, credit history, medical information, and education. Personal Information does not include business contact information such as a user’s name, business title, business address, business licence number, business telephone number, business email address or business fax number, which is not covered by PIPA or this Policy.

This Privacy Policy applies to personal information about website visitors and users and App users that is collected, used or disclosed by us. This Privacy Policy applies to personal information managed in any form, whether electronic or written.

CONSENT

Pro-Health Pharmacy will obtain user consent to collect, use or disclose Personal Information except where Pro-Health Pharmacy is authorized by law (including under PIPA) to do so without consent.

Consent can be provided orally, in writing, electronically, or through an authorized representative, or it can be implied where the purpose of collecting, using or disclosing the Personal Information would be considered obvious, and the user voluntarily provides Personal Information for that purpose.

Subject to certain exceptions (such as the Personal Information being necessary to provide the service or product, or where the withdrawal of consent would frustrate the performance of a legal obligation), users can withhold or withdraw their consent for Pro-Health Pharmacy to use their Personal Information in certain ways. A user's decision to withhold or withdraw their consent to certain uses of Personal Information may restrict Pro-Health Pharmacy's ability to provide a particular service.

By using the Website or the App and/or subscribing to receive notifications through the Website or the App and/or submitting information to us in connection with using our programs, products, and services, you consent to the use of your Personal Information and of information provided which does not constitute Personal Information, including collecting, storing, sharing, using, and disclosing your Personal Information as described in this Privacy Policy.

COLLECTION

Pro-Health Pharmacy will limit the collection of Personal Information to information that is necessary to provide the Services or that is necessary for the purpose consented to by the user or to information that is otherwise permitted to be collected by PIPA or other law.

By registering for Pro-Health Pharmacy's Services, users authorize Pro-Health Pharmacy to collect Personal Information for the purposes described in this Policy including any and all information or other data that users input, upload or otherwise transmit through the user's Pro-Health Pharmacy account through the website or the App (the "Account"). When you create an Account, you must provide us with your name and contact information.

PURPOSE AND USE

When collecting Personal Information, Pro-Health Pharmacy will state the purpose of collection. Pro-Health Pharmacy will not use Personal Information for purposes other than those for which it was collected, except with the consent of the user as required by PIPA or as otherwise required by law.

The purposes for which we collect Personal Information include, without limitation, the following purposes:

1. To establish and maintain a relationship with you and to provide ongoing services, products, and programs. For example, when you request a service through the website or the App, we may collect Personal Information to verify your identity, determine your eligibility for services, products, and/or programs, process your applications, and/or fulfill your requests and inquiries.
2. Some of our services invite you to provide personal and non-personal information in order to allow you to access and use that information for the service to be provided. For example:
 - a. If you would like to request a refill of your prescription(s), you may be asked to provide your name, date of birth, gender, prescription number in order for us to provide this service
 - b. If you download the App, we may ask you if you want to give our App access to your mobile device's location. If you grant the App access to your mobile

location, we will collect location data to better provide our Services to you, such as helping you locate your nearest Pro-Health Pharmacy location.

3. To manage and develop our business and operations. For example:
 - a. We analyze how many customers use our services and systems and customer usage patterns to help make our systems more efficient;
 - b. We may monitor activity to detect and prevent errors and fraud to protect both our customers and our business;
 - c. We collect information about the usage of our App and visits to our website for security purposes and to monitor and investigate incidents.
4. To meet legal and regulatory requirements. For example:
 - a. As per provincial and federal legislation (such as PIPA, British Columbia's *Health Professions Act* (HPA), *Pharmacy Operations and Drug Scheduling Act* (PODSA), *Freedom of Information and Protection of Privacy Act* (FIPPA), and the College of Pharmacists of British Columbia bylaws), we must take reasonable steps to collect personal information to confirm your identity before providing patient-specific services;
 - b. We may collect and preserve personal information by request of a court order.
5. Transactional Notifications: We provide notifications for certain activities relating to your use of our services, products, and programs despite your indicated email preferences. For example, we may send you notices of any updates to our Privacy Policy.
6. Statistics: We also collect statistics about the use of the services, products, and programs through the website or the App. This information will be kept confidential; however, aggregate statistics that do not personally identify an individual will be kept by us, and such aggregate statistics may be made available to third parties.
7. System Logs & Cookies: Like many websites, we may use "cookies" to collect certain types of information when your web browser accesses our website. Cookies are alphanumeric identifiers that are placed on your computer's hard drive to enable our systems to recognize your browser and to provide features. Our website may use cookies to remember the information you gave us so that you don't have to re-enter the information each time you visit our website. You can prevent your computer from accepting new cookies. Most browsers tell you how to do so in their "help" section.

SHARING AND DISCLOSURE OF PERSONAL INFORMATION

We may share your personal information with our service providers and our group of companies or other third-party companies for the purposes described in this Privacy Policy. We do not sell your personal information to any person or organization; the only exception being if we sell or transfer any part of our business, in which case we may transfer and assign your personal information to a purchaser of all or part of the Pro-Health Pharmacy business.

As of the date of this Privacy Policy, we share only the relevant Personal Information about you in respect of the website and the App to our service providers, which include website hosting providers, third-party software providers, payment processors, email service providers, freight carriers, third party marketing platforms and advertising networks. We may disclose or use your personal information to provide and coordinate the treatment, services, and medications you receive. Our servers and service providers are located in Canada, and accordingly, your Personal Information may be available to the Canadian government or agencies under a lawful order, irrespective of the safeguards we have put in place for the protection of your Personal Information.

We may use and disclose your Personal Information for our healthcare operations. Healthcare operations are activities that are necessary to operate our healthcare businesses. For example:

- When you request a prescription refill on the website or the App, your personal information is communicated to our integrated pharmacy management system so that the pharmacist is notified of your request to refill your prescription;
- The prescription delivery service, which is offered through Pro-Health Pharmacy, may be provided by a third-party delivery company to which we may need to provide details such as your name, mailing address, and contact information;
- We may disclose your personal information to pharmacists, doctors, nurses, naturopaths, technicians or other third parties, such as hospitals or other healthcare facilities, to facilitate the provision of your medications you may need. This helps to coordinate care and ensure that everyone who is involved has the information that they need to meet your healthcare needs;
- We may disclose information in accordance with applicable legislation, including, but not limited to, PIPA, the British Columbia *Health Professions Act* (HPA), *Pharmacy Operations and Drug Scheduling Act* (PODSA), and the *Freedom of Information and Protection of Privacy Act* (FIPPA); and
- We may use your personal information to improve the quality and effectiveness of the services that we provide.

From time to time, we may employ third parties to help us improve the website and/or the App. These third parties may have limited access to databases of user information solely for the purpose of helping us to improve the website and/or the App, and they will be subject to contractual restrictions prohibiting them from using the information about our customers for any other purpose.

RETAINING PERSONAL INFORMATION

Users' Personal Information will only be retained for a reasonable time, as determined in the commercially reasonable opinion of Pro-Health Pharmacy, and as required to fulfill the purposes for which it was collected and to meet any applicable legal or regulatory requirements, including without limitation requirements for healthcare providers to retain patient records in accordance with regulatory obligations. If you request that your name be removed from our databases, it may not be possible to completely delete all your Personal Information due to technological and legal constraints.

If Pro-Health Pharmacy uses a user's Personal Information to make a decision that directly affects the user, Pro-Health Pharmacy will retain that Personal Information for at least one year so that the user has a reasonable opportunity to request access to it.

SAFEGUARDING PERSONAL INFORMATION

Pro-Health Pharmacy has physical and technological security safeguards and procedures in place to protect users' Personal Information from unauthorized access. Security measures include restricted access to files and databases and electronic measures such as passwords, user IDs and encryption.

You are also responsible for helping to protect the security of your Personal Information. For example, never give out your email account information or your password to third parties.

Please be aware that although Pro-Health Pharmacy endeavours to ensure the security of all Personal Information, no security system or procedures can prevent all potential security breaches. Accordingly, you acknowledge and agree that you assume all risks associated with the loss, compromise or alteration of Personal Information arising out of or relating to any act or omission, negligent or otherwise, of any third party, including without limitation the unauthorized access of Personal Information by any third party.

ACCURACY OF PERSONAL INFORMATION

Pro-Health Pharmacy will make reasonable efforts to ensure that user Personal Information is accurate and complete where it may be used to make a decision about the user or disclosed to another organization.

CORRECTIONS TO PERSONAL INFORMATION

Users may request correction to their Personal Information in order to ensure its accuracy and completeness. A request to correct Personal Information must be made in writing, including electronic means, and provide sufficient detail to identify the Personal Information and the correction being sought.

If the Personal Information is demonstrated to be inaccurate or incomplete, Pro-Health Pharmacy will correct the Personal Information as required and send the corrected information to any organization to which Pro-Health Pharmacy disclosed the Personal Information in the previous year. If the correction is not made, Pro-Health Pharmacy will note the user's correction request in its file.

LINKING

Any websites that are linked from the website or the App are not under the control of Pro-Health Pharmacy, and Pro-Health Pharmacy does not assume any responsibility or liability for any communications, information or other materials available at such linked sites. Any links on the website or the App are provided for your convenience only and do not constitute an endorsement by Pro-Health Pharmacy.

DELETION OF ACCOUNT

Users' may delete their by navigating to the 'Settings' option of the menu and select the 'Account' option. To delete your account, click the 'Delete account' link and follow the prompts.

Upon deletion of the account, data for the account will not be retained. Should the user wish to enroll again, they will be required to register again for application.

QUESTIONS AND COMPLAINTS

Pro-Health Pharmacy will provide users with access to their Personal Information upon written request to the Privacy Officer at the contact information provided below, subject to applicable legal and business restrictions. Pro-Health Pharmacy will make the requested information available within 30 business days or provide written notice of an extension where additional time is required to fulfill the request. A minimal fee may be charged for access to Personal Information and, if so, users will be given prior notice of the amount that will be charged, and Pro-Health Pharmacy will request further direction from the user on whether Pro-Health Pharmacy should proceed with the request.

Upon request, Pro-Health Pharmacy will also tell users how Pro-Health Pharmacy uses users' Personal Information and to whom it has been disclosed, if applicable.

If a request for Personal Information is refused in full or in part, Pro-Health Pharmacy will notify users in writing or by electronic means, providing the reasons for refusal and the recourse available to the user.

Users can direct any complaints, concerns, questions or suggestions they may have regarding Pro-Health Pharmacy' compliance with privacy law requirements or this Policy to its Privacy Officer as follows:

Name of Privacy Officer: Pharmacy Owner

Telephone: 604-845-8084 _____

Email: Pharmacist@Pro-Health.ca _____

If the Privacy Officer is unable to resolve a concern, users may also write to the Information and Privacy Commissioner of British Columbia.