

# Our Commitment to Your Privacy

PlutoRx Inc. ("PlutoRx", "we", "us" or "our") is committed to protecting the privacy and security of your Personal Information (defined below).

PlutoRx is an online marketplace that allows licensed veterinarians ("Vets") to provide veterinary telemedicine consultations to owners ("Clients") of pets. Both Vets and Clients will be referred to as "user", "you" or "your" throughout this Privacy Policy.

This Privacy Policy describes how PlutoRx may collect, use and disclose your Personal Information. It applies to any Personal Information that is collected by us, whether it is collected in person, over the telephone, in writing, electronically via email messages that link to this Privacy Policy, or via your use of our website, mobile applications or social media pages (each referred to as a "Site") on which this Privacy Policy appears.

For the purpose of this Privacy Policy, "Personal Information" (also referred to as "Personally Identifiable Information" in some jurisdictions) means any information about an identifiable individual, in accordance with applicable privacy and data protection laws. Aggregated, de-identified or anonymous information that does not identify an individual is not considered to be Personal Information.

By using the Site or otherwise providing us with your Personal Information, you consent to our collection, use and disclosure of your Personal Information in accordance with the terms of this Privacy Policy. This Privacy Policy should be read together with our [Terms of Use](#), which incorporates this Privacy Policy by reference. If you do not agree with this Privacy Policy or our [Terms of Use](#), please do not use our Site.

We encourage you to read this Privacy Policy carefully, and to watch for and read any updates that might be made from time to time, as explained below under "Changes to this Privacy Policy". Your continued use of the Site or provision of Personal Information to us, after we post or communicate a change to the Privacy Policy signifies your consent to the revised Privacy Policy.

## What Information Do We Collect?

We collect Personal Information that you voluntarily provide to us in order to use our services. This Personal Information is collected for the purpose of providing you with the services you request or choose to interact with and responding to inquiries you make, as described below.

For Clients – we collect the following Personal Information when you register an account on our Site:

- First and last names
- Residential address
- Email address(es)
- Mobile phone number(s)
- Details about your Pet
- Transactional and payment information
- Technical information related to your use of our services

For Vets – we collect the following information when you subscribe to our service and post your listing on your Site. This information largely consists of business contact information, which may not constitute “Personal Information” under applicable privacy laws:

- First and last names
- Veterinary licence information
- Veterinary clinic information
- Mobile phone number
- Banking information (for deposit of patient consultation fees)
- Signature for use in prescription writing

In addition to the above, we may collect additional Personal Information in the following circumstances:

- **Customer Service:** We will collect any Personal Information you choose to provide when engaging with our customer service for the purposes of responding to your inquiry or resolving your issue.
- **Marketing Communications & Email Correspondence:** When there is a separate sign-up for marketing communications, we may ask for your contact information such as your name and email address. We may also collect Personal Information if you choose to disclose it in your email correspondence with us.
- **Professional and career-related information** and other information you submit to us when applying for a career opportunity, which may include your education and employment history, your resume, letters of reference, references, and any additional information provided by you in an application form or correspondence.

## Payment information

**Payment Information for Clients:** PlutoRx does not collect payment information for Clients. All Patient payments are made through our third-party payment processor, Stripe Inc., and all payment information will be processed in accordance with Stripe Inc.'s [terms and conditions](#) and [privacy policies](#). Clients should familiarize themselves with those policies.

**Payment Information for Vets:** As set out in our [Terms of Use](#), as a condition of PlutoRx enabling payment processing services through Stripe Inc., you agree to provide PlutoRx with accurate and complete information about you and your business, and you authorize PlutoRx to share it and transaction information related to your use of the payment processing services provided by Stripe Inc. All payment information will be processed in accordance with Stripe Inc.'s [terms and conditions](#) and [privacy policies](#). Veterinarians should familiarize themselves with those policies.

## Technical Information Collected by Automated Means

In addition to the above information provided to us directly by you, we may also collect the following information that is automatically generated by your use of the Site ("Technical Information").

Technical Information is generally non-identifying, but if we associate it with you as an identifiable person, we will treat it as Personal Information in accordance with this Privacy Policy.

- **Log Files:** Log files make a record of each visit to our Site and log a number of details, including: your operating system; the date, time and duration of the visit; the pages and documents accessed; and the previous site accessed by you (such as, the search engine that referred you to our Site). Such information is collected for aggregated statistical purposes only, such as to track the number of visits to our Site, the number of views to particular pages, time-based traffic patterns, and the proportion of visitors using certain devices. PlutoRx will not make any attempt to identify users according to their browsing activity through such records.
- **Device Identifiers:** A device identifier, such as an IP address, is a distinctive number associated with a device. We may use your device identifier to identify you when you visit our Site to determine repeat visitors and detect and prevent fraudulent activity. By using device identifiers to approximate geographic location (to a city level), we can determine your approximate time zone, and better understand the locations of our customer base.
- **Cookies:** Cookies are small text files stored on your computer that identify your IP address to our computers each time you visit our Site. We may use both session cookies (which expire once you close your web browser) and persistent cookies (which stay on your computer until you delete them). We may use cookies to collect and store certain information that details your preferences, in order to facilitate a more personalized browsing experience. We may also use cookies to collect aggregated statistical information, similar to that collected through log files. You can choose to disable or block cookies on your browser, as described below under the heading "Your Privacy Preferences".
- **Web Beacons:** We may use web beacons, also known as pixel tags, clear GIFs or other similar technologies in connection with some of our Site pages, social media pages and HTML-formatted email messages to, among other things, track the actions of users and email recipients, measure the success of our marketing campaigns, and compile statistics about our Site and social media usage and email response rates. These technologies usually work in conjunction with cookies. If you do not want your cookie information to be associated with your visits to these pages, you can disable or block cookies as noted below under the heading "Your Privacy Preferences". If you turn off cookies, web beacons (or similar technologies) will still detect visits to these pages, but the notices they generate cannot be associated with other cookie information and are disregarded.
- **Analytics:** PlutoRx uses Google Analytics to provide statistics about the visitors to our Site. Google Analytics tracks and analyzes non-personally identifiable statistical information, including, without limitation, search engines, display advertising, pay-per-click networks, email marketing and digital collateral such as links within PDF documents.
- **Geo-location:** If you have activated the GPS location feature on your mobile device when using one of our apps or permit us to identify your location when using our website, we will have access to your location in order to match Clients with eligible Vets in the closest eligible locale.

# How We Use Your Information

Personal Information - PlutoRx generally collects and uses your Personal Information for the following purposes:

- To register and set-up your account on our Site;
- To best match Clients with Vets in order to provide veterinary telemedicine consultations and other services for their Pets;
- For administration, billing, accounting and collection of fees owing to us for our services;
- To deposit payment to Vets for patient consultations;
- To respond to your inquiries and provide you with customer support at your request;
- To send you marketing communications with your express or implied consent, as permitted by applicable law;
- To prevent prohibited or illegal activities, protect against fraud and enforce our [Terms of Use](#); and
- To fulfill other purposes disclosed at the time you provide us with your Personal Information or which are reasonably necessary to provide products and/or services requested by you.

Technical Information - We use Technical information as described above:

- To monitor and analyze usage of our Site and identify trends in order to improve our Site;
- To tailor content on the Site to your interests, and
- To send you advertisements from third parties targeted to your interests. To opt-out of receiving targeted advertising, please follow the steps in the section below titled “Your Privacy Preferences”.

## Disclosure of Your Information

**PlutoRx does not trade or sell Personal Information to others.** As described in greater detail below, PlutoRx may generally disclose Personal Information to respond to legal requirements, enforce our policies, respond to claims that content violates the rights of others, or protect anyone’s rights, property, or safety. Such information will be disclosed in accordance with applicable law.

**Third Party Service Providers:** PlutoRx may from time to time disclose Personal Information about users to third parties who provide services to PlutoRx (“Third Party Service Providers”), including, but not limited to, our web development teams/designers and our email marketing providers and our pharmacy distributors. We will limit this disclosure to only the Personal Information that is reasonably necessary for the purpose or service for which the Third Party Service Provider is engaged. We will use contractual and other means to provide a comparable level of protection while the information is being processed by these Third Party Service Providers, including limiting such providers to using your Personal Information solely to provide PlutoRx with the specific service for which they were engaged, and for no other purpose.

**Pharmacy Partners:** We may disclose your personal information to a veterinary pharmacy for the purposes of providing our services, including to facilitate the fulfillment of your order for prescription pet medication or non-drug veterinary or pet-related products, and to provide you with the opportunity to purchase additional non-drug veterinary or pet-related products.

**Advertising and Marketing:** We may collect and use your personal information to provide you with customized information, offers, and promotions regarding our services and other products and services that might be of interest to you, through our website and other websites, social media, and online services.

We may engage third-party advertising and social media companies to display advertisements for our services on websites, social media, and other online services. Those companies may use cookies and similar technologies to collect information about you and your interaction over time on their websites and online services and other websites and online services, and use that information to display advertisements that might be of interest to you. We may also share information about our customers with those companies to facilitate interest-based advertising to our customers and similar users on other websites and online services.

**Law Enforcement:** We may share your Personal Information with law enforcement, national security agencies or other governmental officials, as required or permitted by law, such as in response to a court order or a verified request relating to a criminal investigation or alleged illegal activity.

**Sale or Business Transaction:** Subject to applicable law, we may share or transfer your Personal Information where reasonably required in the context of a prospective or completed sale, merger, amalgamation or other business transaction involving all or part of our business. In any such case, the recipient parties will be contractually required to keep the information confidential and use it only for the purposes of the transaction, or proposed transaction, in question. In the event a business transaction is concluded, assignees or successors of PlutoRx or our business or assets may use and disclose Personal Information only for the purposes as set out this Privacy Policy, unless further consent is obtained from you.

**Technical Information:** As described above, we share your Technical Information with the Google Analytics analytical platform to help us understand how you use our Site so that we can enhance your user experience. We may also share your Technical Information with third parties, which will allow those third parties to send you advertisements targeted to your interests.

**Aggregated, Anonymous Demographic Information:** PlutoRx may share with third parties aggregated, anonymous demographic information, which cannot reasonably be used or linked to any Personal Information to identify any individual person.

## Personal Information of Minors

We do not knowingly collect Personal Information of minors; however, we cannot always determine the age of persons who access and use our Site. If a minor (as defined by applicable law) provides

us with his/her data without parental or guardian consent, we encourage the parent or legal guardian to contact us to have this information removed from our records.

## Third-Party Platforms

The Site may contain links to other third-party platforms. While we try to link only to platforms that share our high standards and respect for privacy, please understand that we are not responsible for the content of, or the privacy practices employed by other platforms. We encourage you to review the privacy policies of each platform you visit.

## Processing, Retention and Storage of Personal Information

We will retain your Personal Information for only so long as is necessary to fulfill the purposes for which it was collected, and for such periods of time as may be required to comply with applicable law.

When your Personal Information is no longer required, we will make all reasonable efforts to ensure all electronic and hard copies of such information are securely destroyed or de-identified. However, where your information has been provided to third parties for certain purposes, such as payment processing, those third parties, such as payment processors and financial institutions, may retain the information according to their own retention and privacy policies.

Your Personal Information may be stored or processed by PlutoRx or Third Party Service Providers outside of your jurisdiction of residence, including in Canada, the U.S. or another foreign jurisdiction outside of Canada. When this occurs, your Personal Information may be accessible without notice to you by the courts, law enforcement and national security authorities of that jurisdiction. You can obtain more information about our policies and practices with respect to the use of Third Party Service Providers outside of Canada by contacting us as described below, under “Contact Us”.

## Safeguarding Your Personal Information

We take all reasonable measures designed to safeguard your Personal Information against unauthorized access, use, disclosure, copying or modification. Such measures, which may necessarily evolve over time as the availability and effectiveness of methods vary, include physical, organizational and technological safeguards, such as:

- Restricting access to Personal Information to employees and Third Party Service Providers who need such information for a legitimate business purpose, and who are required to abide by this Privacy Policy and PlutoRx’s internal privacy and security practices.

- Restricting access to our systems, accounts and electronic databases or other electronic formats that may contain Personal Information through password protection and internal security policies.
- Implementing technical security measures such as firewall technology, anti-malware screening and data encryption technology.

While PlutoRx employs advanced data encryption technology when interfacing with our users, Third Party Service Providers and other partners, you should be aware that there is a residual risk in transmitting any data electronically. Despite our efforts, no security measures are perfect or impenetrable and no method of data transmission can be guaranteed against any interception or other type of misuse. This risk is inherent in all Internet dealings.

## Your Privacy Rights

Where you have provided your consent to the collection, use or disclosure of your Personal Information, you may have the legal right to withdraw your consent under certain circumstances by contacting us as set out below under the “Contact Us” heading.

We will take all reasonable steps to ensure that all Personal Information we collect, use or disclose is accurate, complete and up-to-date. Please contact us if your Personal Information changes or if you believe the information we have about you is not accurate or complete.

Subject to applicable privacy laws, we will, on request, provide you with reasonable opportunity to access the Personal Information about you that we retain, and, as appropriate, have it corrected or updated. All such requests must be received in writing. We will make the information available within a 30-day time frame, or provide written notice of extension, where additional time is required to fulfill the request.

Please note that your right to access your Personal Information may be limited by applicable privacy laws. In order to verify your identity, we may also request that you provide certain Personal Information to us to match against our records.

## Your Privacy Preferences

If you are receiving our marketing communications, you may unsubscribe at any time by clicking on the “unsubscribe” option in any marketing email or text you receive or by contacting us as set out below under the “Contact Us” heading. Please note that if you unsubscribe from marketing communications, we may still send you transactional emails or emails about your use of our Site.

You can disable or block cookies by following the instructions on your web browser. While you do not need to enable cookies to visit our Site, certain features of our Site depend on the use of cookies. Accordingly, if you choose to block cookies, you may not be able to use those features or may lose preferences based on those cookies.

If you prefer not to receive targeted advertising, you can opt-out of some network advertising programs that use your information.

## Changes to this Privacy Policy

We may amend this Privacy Policy from time to time as our business evolves, in response to legal developments, as new technologies become available, or as we introduce new features, products or services.

When we make changes to this Privacy Policy we will revise the “Last Updated” date at the top of the policy. You should check back here periodically to find out if any changes have been made to this Privacy Policy. If we make substantial changes, we will, as appropriate, prominently post these changes to our Site and notify registered users of the Site.

If you disagree with any change to the Privacy Policy, please refrain from using our Site or otherwise providing us with your Personal Information. By continuing to use our Site or by providing us with Personal Information after we post or communicate a change to the Privacy Policy, you signify your consent to the revised terms of the Privacy Policy.

## Data Requests

For any data deletion requests, please send an email to **[support@plutorx.ca](mailto:support@plutorx.ca)** to get the process started.

## Contact Us

If you would like to exercise your privacy rights or preferences, or if you have any questions or complaints about this Privacy Policy, or how your Personal Information has been collected or handled by PlutoRx, please contact us at **[support@plutorx.ca](mailto:support@plutorx.ca)**.