

# Privacy Policy

At Pure Integrative Pharmacy, we respect your privacy and take great care to safeguard your information, which includes your personal information. We want you to understand the purposes for which we collect, use and disclose personal information about our customers and users of our website and the PurePharmacy App.

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## 1. Scope and Application

In this Privacy Policy (“Privacy Policy”), the terms “Pure Integrative Pharmacy”/ “PurePharmacyRefills.com”/“Pure Pharmacy”/“we”/“us”/“our” refer to Pure Integrative Pharmacy and our affiliates. The terms “you”/“your”/“user”/“users”/“viewers” refer to our customers, website visitors, and application users. The term the “website” refers to our website located at <http://www.purepharmacyrefills.com>. The term “app” refers to the PurePharmacy App.

“**Personal information**” is information that identifies an individual, including, but not limited to your name, mailing address, postal code, telephone number(s), and e-mail address. “**Personal Health Information**” is personal information that healthcare providers may use to identify or can identify you and relates to the state of your health or the treatment you are receiving, such as your date of birth, gender, personal health number (PHN), diagnostic, treatment and care information, and/or registration information with our healthcare services. “**Non-personal information**” is information of an anonymous nature, such as an Internet Protocol Address (IP Address), the domain used to access the website, and the type and version of browser or operating system being used by visitors to the website. Aggregate information, such as demographic statistics of our users (e.g. average age or geographical allocation of our users), number of visitors, what pages users access or visit, and average time spent on the website is not considered Personal Information. Any data collected in with all the “personal identifiers” have been removed or de-identified, making it impossible to determine the person’s identify to whom it relates is also not considered personal information. Similarly, business contact information such as the name, position or title, address, e-mail address, or telephone number of a business or professional person or an employee of an organization are not considered personal information.

- This Privacy Policy applies to personal information about website visitors 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.

- This Privacy Policy does not apply to Pure Integrative Pharmacy stores. Consent given at a Pure Integrative Pharmacy location pertains to your personal information given at that location. For information about a location's policy about personal information as well as information collected through our website, please contact that location directly.
- This Privacy Policy does not apply as per the exceptions listed below or to the practice of other entities or companies that we do not manage or control.

## 2. Your Consent:

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 Non-Personal Information, including collecting, storing, sharing, using, and disclosing your personal information as described in this Privacy Policy. We only collect personal information if we ask you, and obtain your consent to its use. **You may withdraw your consent at any time, except in limited situations, including legal or regulatory requirements. However, if you withdraw consent or choose not to provide us with certain personal information, this may result in your inability to continue using the Website, the App, or certain features of them.** Please do not provide your personal information if you do not want us to collect it. At the time of collection, we will clearly identify the information being collected and the purposes for which it will be used. Although the use of certain non-personal information collected, used or disclosed as described herein is not restricted (and to the extent that such is the case, the obligations under this Privacy Policy do not apply to such information), we provide information in this Privacy Policy about the collection of such information for the sake of transparency with respect to the operation of the Website and the App.

## 3. Why do we collect personal and non-personal information?

We collect personal and non-personal information for the following purposes:

To establish and maintain a relationship with you and to provide ongoing service, 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, processing your applications, and/or fulfilling your requests and inquiries
- We collect and use personal information to confirm your identity when you contact us. For example, if you contact us, we need some information to verify that it's really you and not someone else trying to access your information without authorization.

Some of our services invite you to provide personal and non-personal information in order to allow you to access and to use that information for the service to be provided. For example:

- 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
- If you download the App, we will 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 for to better provide our Services to you, such as helping you locate your nearest Pure Pharmacy location.

To manage and develop our business and operations. For example:

- We analyze how many customers use our services and systems and customer usage patterns to help make our systems more efficient.
- We may monitor activity to detect and prevent errors and fraud to protect both our customers and our business.
- We collect information about usage of our app and visits to our website for security purposes and to monitor and investigate incidents

To meet legal and regulatory requirements. For example:

- As per provincial and federal legislation (such as 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
- We may collect and preserve personal information by request of a court order

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.

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 other members or third parties.

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 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. Because cookies allow you to take advantage of some of Website features, we recommend you leave them turned on.

#### **4. How do we share 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 have put in place contractual and other organizational safeguards with our agents to ensure a proper level of protection of your Personal Information. We do not sell your personal information to any person or organization; the only exception is if we sell or transfer any part of our 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 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 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 Pure 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, the British Columbia's Health Professions Act (HPA), BC Personal Information Protection Act (PIPA), Pharmacy Operations and Drug Scheduling Act (PODSA), and Freedom of Information and Protection of Privacy Act (FIPPA).
- 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 members for any other purpose.

## **5. Exceptions:**

This Privacy Policy does not apply to personal or non-personal information provided by or about customers of <https://www.purepharmacy.com>, which has its own Privacy Policy found at <https://purepharmacy.com/pages/privacy-policy>

We may disclose your Personal Information to third parties without your consent if we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be causing injury to or interference with (either intentionally or unintentionally) our rights or property, other users of the Website or the App, or anyone else (including the rights or property of anyone else) that could be harmed by such activities. We may disclose Personal Information when we believe in good faith that such disclosure is required by and in accordance with the law. We may also disclose your Personal Information in connection with a corporate reorganization, a merger or amalgamation with another entity, a sale of all or a substantial portion of our assets or stock, including any due diligence exercise carried out in relation to the same, provided that the information disclosed continues to be used for the purposes permitted by this Privacy Policy by the entity acquiring the information.

## **6. How do we protect and store your personal information?**

The security of your Personal Information is very important to us. We use commercially reasonable efforts to store and maintain your Personal Information in a secure environment. We take technical, contractual, administrative, and physical security steps designed to protect Personal Information that you provide to us. We have implemented procedures designed to limit the dissemination of your Personal Information to only such designated staff as are reasonably necessary to carry out the stated purposes we have communicated to you.

For example, where appropriate, we use the following methods to safeguard your personal information:

- We may anonymize your information by altering your data such that it can no longer be used to identify you;
- We may encrypt your information by obscuring it so that it is unreadable without the use of a key or code;
- We may log and monitor activity related to the access and/or use of your personal information or accounts by tracking and recording related activity

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

We will keep your Personal Information for as long as it remains necessary for the identified purpose or as required by law, which may extend beyond the termination of our relationship with you. For example, healthcare providers must retain patient records in accordance with regulatory obligations. We may retain certain data as necessary to prevent fraud or future abuse, or for legitimate business purposes, such as analysis of aggregated, non-personally-identifiable data, account recovery, or if required by law. All retained personal information will remain subject to the terms of this Privacy Policy. 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.

## **7. How do I know if there are changes to this Privacy Policy?**

We reserve the right to change this Privacy Policy at any time. Any changes to this Privacy Policy will become effective on the date a modified version of the Privacy Policy is posted on this webpage. Unless stated otherwise, our current Privacy Policy applies to all Personal Information that we have about you. The date on which the latest update was made is indicated by the “Effective Date” at the top of this document. We recommend that you print a copy of this Privacy Policy for your reference and revisit this policy from time to time to ensure you are aware of any changes. Your continued use of the Website or App signifies your acceptance of any changes. If you do not agree to the changes in our Privacy Policy, it is your responsibility to stop participating in our programs, and/or use of our services, and/or purchasing our products. Additionally, it is your obligation to ensure you read, understand, and agree to the latest version of this Privacy Policy.

## **8. How do I Request Access to my Personal Information?**

Some of the personal information we hold about you is accessible through logging in to your online account on the website and/or App. You can update or correct some of your personal information by logging into your account and making updates to profile information and preferences.

To access your Personal Health Information, please contact your healthcare provider directly. To access your personal information collected by a third party, please contact the third party directly.

You have the right to access the Personal Information we hold about you in order to verify the Personal Information we have collected in respect to you and to have a general account of our uses of that information. For personal information not available through your online account, upon receipt of your written request, we will provide you with a copy of your Personal Information. In certain limited circumstances, we may not be able to make all relevant information available to you such as where that information also pertains to another user. In such circumstances we will provide reasons for the denial to you upon request. We will endeavor to deal with all requests for access and modifications in a timely manner. We will make every reasonable effort to keep your Personal Information accurate and up-to-date, and we will provide you with mechanisms to update, correct, delete or add to your Personal Information as appropriate. As appropriate, this amended Personal Information will be transmitted to those parties to which we are permitted to disclose your information. Having accurate Personal Information about you enables us to give you the best possible service.

### **9. Who do I contact with Privacy Questions?**

You can help by keeping us informed of any changes such as a change of address or telephone number. If you would like to access your information, if you have any questions, comments or suggestions or if you find any errors in our information about you, please contact us at: [info@PurePharmacy.com](mailto:info@PurePharmacy.com).