

# Privacy policy

Protecting privacy and maintaining the confidentiality of personal information have always been a priority for Familiprix Inc. (hereinafter “Familiprix”) and Familiprix pharmacist-owners.

To earn and maintain your trust, Familiprix and Familiprix pharmacist-owners developed a privacy policy (hereinafter the “Policy”) that meets or exceeds the requirements of the Act respecting the protection of personal information in the private sector and its associated Regulations.

The purpose of this Policy is to demonstrate the commitment of Familiprix and Familiprix pharmacist-owners to respect the personal information and protect the privacy of customers as well as inform you how Familiprix and Familiprix pharmacist-owners collect, retain, use, communicate, transfer, and store your information. Please take time to familiarize yourself with our confidentiality practices, and let us know if you have any questions.

## Definitions

Personal information is any information that relates to an individual and exclusively enables that individual to be identified. Personal information includes in particular your name, mailing address, phone number, email address, date of birth, sex, financial information (including credit card information and loyalty program membership numbers), medical information in accordance with applicable laws, such as your medical history, medical situation, or allergies, information on the provincial drug insurance program or a private drug insurance plan, information on the prescribing physician, or any other relevant information about your health status that enables Familiprix pharmacist-owners to serve you better.

A customer is any individual who (i) buys or orders products or services from Familiprix, (ii) contacts Familiprix, (iii) enters a promotional contest organized by Familiprix, (iv) is a member of a Familiprix loyalty program and/or holds a customer account at Familiprix and/or any other account of any nature whatsoever on the Familiprix website, or (v) accesses any other customer service offered by Familiprix.

A patient is any individual who (i) buys or orders products or services at a Familiprix pharmacy and does or will do business under the names Familiprix, Familiprix Drug, Familiprix Extra, Familiprix Clinic, or any other name held, created, or acquired by Familiprix, (ii) contacts a Familiprix pharmacy, (iii) has a user account with a Familiprix pharmacy, a Refill your Prescriptions account in the Health Zone section, and/or a Health Profile account in the “My Pharmacy” mobile app, or (iv) accesses any other customer service offered by a Familiprix pharmacy.

A third party is any individual or legal entity other than a Familiprix pharmacy, Familiprix pharmacist-owner, customer, and/or patient.

## Scope of the Privacy Policy

This Policy applies to personal information that is provided freely and unequivocally by customers and/or patients or their authorized representatives either to Familiprix or Familiprix pharmacist-owners in verbal, written, or electronic form in any manner or by any means whatsoever in the course of the operation of Familiprix and Familiprix pharmacies, the Familiprix.com website (including the Health Zone section and/or the “My Pharmacy” mobile app), or social media or that is provided by third parties if customers and/or patients have given their consent to such provision or by sources available to the public.

## Collection of Information and Confidentiality

## Collection of personal information by Familiprix

When you navigate the Store Zone section of our website, Familiprix may occasionally ask you to provide personal information that enables you to be identified, particularly your name, mailing address, phone number, or email address. If you do not wish personal information about you to be collected, simply do not provide it.

Familiprix will collect personal information freely provided by customers when customers perform the following actions, without limitation:

- Buy, order, return, or exchange products
- Request information about products or services
- Enter a contest
- Take part in a survey
- Contact Familiprix
- Create a customer account

However, Familiprix may collect personal information about customers, without their consent, from third parties if permitted by law.

Furthermore, Familiprix may collect personal information from customers, without their consent, when it is in their interest and such information cannot be collected by Familiprix in a timely manner or must be collected from a third party to ensure the information is accurate.

## Collection of non-personal information by Familiprix

When you navigate the Store Zone section of our website, you acknowledge that any material or information that you send via this site becomes the property of Familiprix and you consent to Familiprix's use of such information.

When you visit our website, some information of a non-personal nature (other than your name, address, email address, or phone number) is automatically collected. As such, we may install online tools such as cookies and Web beacons on our website to improve our online security measures, evaluate the efficiency and success of our website and marketing campaigns, and offer our online users a more personalized experience.

**Online security:** The sections of our website that require authentication may use cookies to help protect your accounts against unauthorized users. Using cookies helps maintain the integrity of sessions and provides increased security, ensuring that unauthorized attempts to access your health account are blocked.

**Evaluation of the website and our marketing campaigns:** Cookies and Web beacons may be used on our site to evaluate the use and operation of our website. Information may include pages visited, the type of browser used, the level of encryption supported by your browser, your Internet Protocol (IP) address, and the website that directed you to the Familiprix website.

**Personalized online experience:** Cookies may be used on our website to collect information on online activities and preferences, e.g., Web pages visited, length of visits, and successful downloads. Such information may be used with other information to help us better understand your interests and needs, offer you a personalized online experience, and present new products and services.

You may delete or disable cookies and Web beacons at any time using your Web browser's security settings. If you have disclosed information that you no longer wish to have included in our files or would like to know more about, please email our Customer Service Department at [experienceclient@familiprix.com](mailto:experienceclient@familiprix.com) or write to the following address: Customer Service Department, Familiprix Inc., 6000 rue Armand-Viau, Quebec City, Quebec, G2C 2C5.

## **Confidentiality**

Familiprix acknowledges the confidential nature of personal information and undertakes to take all reasonable measures to protect its confidentiality.

## **Collection of personal information by Familiprix pharmacist-owners**

Familiprix pharmacist-owners will collect, in accordance with the law, personal information freely provided by patients when patients perform the following actions, without limitation:

- Submit a drug prescription to be filled
- Pay for prescription drugs
- Buy, order, return, or exchange pharmacy products
- Request information about pharmacy products
- Contact the pharmacist for medical advice
- Obtain and confirm their registration in a Refill your Prescriptions account in the Health Zone section and/or a Health Profile account in the “My Pharmacy” mobile app

## **Confidentiality**

Familiprix pharmacist-owners acknowledge the confidential nature of personal information and undertake to take all security measures required to protect its confidentiality in accordance with the law.

## **Use of personal information by Familiprix**

Familiprix may use or disclose personal information that it has collected solely for the purposes for which it was collected, notably to:

- Contact customers and answer any questions they may have
- Enable customers to register and take part in programs, resources, and communications offered by Familiprix and to personalize said resources and communications
- Offer customers products, services, functions, and resources that they request, e.g., literature and information on activities, quizzes, promotional contests, surveys, promotions, and online purchases
- Understand customer needs
- Protect customers against fraud
- Verify whether products are suitable for customers
- Better manage the relationship between Familiprix and its customers
- Manage customer accounts on the website
- Comply with and fulfill the requirements of legislation, regulations, or other terms and conditions authorized by law

## **Use of personal information by Familiprix pharmacist-owners**

Familiprix pharmacist-owners undertake to use or disclose personal information that they have collected solely for the purposes for which it was collected, notably to:

- Fill a prescription
- Contact patients in pharmacy and/or via the Health Zone section of the Familiprix.com website and/or via the “My Pharmacy” mobile app and answer questions they may have about their healthcare needs
- Render pharmaceutical services to patients that meet their needs with respect to their patient records, either in pharmacy and/or via the Health Zone section of the Familiprix.com website and/or via the “My Pharmacy” mobile app
- Provide the followup required for pharmaceutical services rendered to patients in pharmacy and/or via the Health Zone section of the Familiprix.com website and/or via the “My

Pharmacy” mobile app

- Provide patient medical followup with other health professionals, such as patients’ prescribing physicians or pharmacists in the case of prescription transfers
- Contact an agency responsible for the provincial drug plan or a private drug insurance plan to process prescription drug claims
- Contact and share personal information with third parties designated by patients as their representatives for their health care
- Modify and update patients’ health information in their pharmacy records and/or in their Refill Your Prescriptions accounts in the Health Zone section of the Familiprix.com website and/or via the “My Pharmacy” mobile app
- Offer patients improved products and services in pharmacy and/or via the Health Zone section of the Familiprix.com website and/or via the “My Pharmacy” mobile app

## **Limitations regarding use and disclosure**

Familiprix and/or Familiprix pharmacist-owners will use or disclose personal information about you solely for the purposes for which it was collected unless you provide consent or the law requires it.

In certain circumstances permitted by law, Familiprix may disclose personal information to third parties without a customer’s consent, notably (i) to legal and regulatory authorities in the case of criminal activities or alleged violations of the law in order to detect and prevent fraud, when this is required to meet the legal and regulatory requirements of governments, regulatory bodies, or other self-regulating bodies, (ii) to an individual or body to comply with a court order, (iii) to another individual because of an emergency that puts the patient’s life, health, or safety in danger, (iv) to protect the property of Familiprix and Familiprix pharmacist-owners (e.g., collection of an outstanding debt), or (v) to an individual exposed to danger, to his/her representative, or to any other person who could provide assistance to prevent an act of violence, including suicide, when there are reasonable grounds to believe there is imminent danger of death or serious bodily injury to a person or identifiable group of people.

Familiprix does not provide, sell, or rent out personal information to any business or individual other than companies associated with Familiprix and/or companies assigned by Familiprix to manage personal information and its website. For example, Familiprix may transfer your personal information to a service provider with which it has signed a contractual agreement stipulating appropriate personal information and privacy protection standards, when such service provider assists Familiprix for the abovementioned reasons. This may include service providers that provide data storage or processing.

Furthermore, in the event of reorganization, a merger, or a sale, Familiprix may disclose all your personal information that it has collected to a third party or when otherwise permitted or required by law. In certain circumstances permitted by legal and professional rules, Familiprix pharmacist-owners may disclose personal information to third parties without a customer’s consent, notably (i) to employees who assist pharmacists and use or disclose such personal information for the abovementioned purposes, (ii) to other health professionals, such as prescribing physicians or pharmacists in the case of prescription transfers, (iii) to an agency responsible for the provincial drug plan or a private drug insurance plan to process prescription drug claims, (iv) to an individual exposed to danger, to his/her representative, or to any other person who could provide assistance to prevent an act of violence, including suicide, when there are reasonable grounds to believe there is imminent danger of death or serious bodily injury to a person or identifiable group of people, and (v) to companies assigned by Familiprix pharmacist-owners to manage personal information, e.g., they may transfer your personal information to a service provider, such as a provider of data storage or processing services, with which they have signed a contractual agreement stipulating appropriate personal information and privacy protection standards (service providers may not store, analyze, or use your personal information for purposes other than those mentioned above), and (vi) to any individual or body to comply with and fulfill the requirements of legislation, regulations, or other terms and conditions authorized by law.

## **Retention**

Familiprix and Familiprix pharmacist-owners retain the personal information of customers and patients for such reasonable time as is necessary to fulfill the purposes for which it was collected or to fulfill legal requirements. At the end of such time, personal information is supposed to be destroyed within a period of time that is determined according to record retention policies. Such period of time may vary depending on the nature of the personal information and the purposes for which it was collected.

## **Accuracy of personal information and correction of data**

Familiprix and Familiprix pharmacist-owners will ensure that your personal information is accurate, complete, and as up-to-date as possible, but will not update it on a regular basis except where necessary. You are therefore responsible for providing us with written updates of your personal information from time to time, where applicable. Failure to notify us of a change to your personal information may adversely affect the manner in which we communicate with you or offer you services.

## **Security measures**

Familiprix and Familiprix pharmacist-owners take precautions, notably physical, organizational, contractual, and technological security measures, to protect your personal information against loss, theft, and unauthorized access, disclosure, copying, use, and modifications. Access to your personal information is granted only to employees who must reasonably become aware of it for professional purposes or as part of their duties. In general, only Familiprix employees who work in the Purchasing, Advertising, Merchandising, Online Customer Service, and IT departments have access to personal information collected by Familiprix and only to the extent necessary to perform their duties.

## **Access to personal information**

By opening a session on the Familiprix.com website, you can access the personal information about you that Familiprix (in the Store Zone section) and Familiprix pharmacist-owners (in the Health Zone section) have collected and correct it if necessary. You may also submit a written request to Familiprix to examine and correct, if necessary, the personal information about you that Familiprix has collected, used, or disclosed, by email to [experienceclient@familiprix.com](mailto:experienceclient@familiprix.com) or by mail to Familiprix Inc., 6000 rue Armand-Viau, Quebec City, Quebec, G2C 2C5.

You may elect to stop receiving marketing or promotional communications in electronic form from Familiprix by unsubscribing using the mechanism indicated in such communications, as the case may be, by sending a written request to this effect to one of the abovementioned addresses, or by calling 1-866-277-1704.

We will attempt to respond to each of your written requests within ten (10) days of their receipt. If we are unable to do so within such time limit, we will notify you in writing.

Before permitting you to access, use, or disclose the personal information that we have about you, we may request that you provide sufficient identification. In such case, any information provided to identify you will be used only for this purpose.

If you have any questions regarding your personal health information, please contact the Familiprix pharmacist-owner who provided you with pharmaceutical services.

You may also submit a request to your Familiprix pharmacist-owner via the Health Zone section of the Familiprix.com website to examine and correct, if necessary, the personal information about you that the Familiprix pharmacist-owner has collected, used, or disclosed.