

Privacy Policy

Group Vétéri-Médic Inc regroups the Canadian operations of affiliated animal hospitals located throughout Québec (“GVMI”). At GVMI, we know that the protection of your privacy is important to you. For this reason, we have taken steps to ensure that any personal information that you provide to GVMI is protected by a range of robust business procedures and rigorous security safeguards to ensure that your information is kept confidential and used only for the purposes detailed in this Privacy Policy. This Privacy Policy is intended to establish responsible and transparent practices for the management of personal information and to satisfy the requirements of rules established by the *Personal Information Protection and Electronic Documents Act* (PIPEDA), as well as other applicable provincial privacy laws that may apply.

Application and Scope

This Privacy Policy generally applies to any personal information (as defined below in the section entitled Definition of Personal Information) collected or generated by GVMI, including any of our hospitals or anyone acting as an agent on our behalf, from or about our customers, in any form. This Privacy Policy also governs personal information collected about GVMI websites visitors and explains how we use and disclose personal information that we collect from people who interact with us through <http://www.associatevets.com/> or any of our affiliated hospitals’ websites, a list of such hospitals is available at <http://associatevets.com/hospitals/> (“website” or “websites”). It also explains how we use cookies and similar technologies.

Definition of Personal information

When used in this Privacy Policy, personal information means “any information about an identifiable individual”. This may include, for example, your name, contact information, email-address, information relating to your pet and its health history, as well as billing information and any complaints documented in a file. It may also include other types of more technical information such as website users’ IP addresses, browser history (pages accessed, date of access, location when accessed), but only when this information can identify you as an individual. Personal information that is aggregated and cannot be associated with an identifiable individual is not considered to be personal information.

Collection of Personal Information

We collect most of our information about you directly from you, with your consent, when you visit one of our affiliated hospitals and/or complete and submit a Client Registration Form. More specifically, the type of personal information that we may collect about our customers includes:

- Information establishing your identity, such as your name and contact details, including the name of your spouse who has joint custody of your pet;

- Information allowing us to communicate with you, such as your email address and phone number;
- Information to allow us to process payments, such as your credit card information or other payment details;
- Information on your thoughts and opinions to allow us to improve services or service offerings; and
- Other information that is necessary to facilitate the delivery of services to you, including information pertaining to your pet and its health issues.

Use of Personal Information

GVMi generally collects personal information from or about its customers for the following purposes:

- to deliver services and products which you have requested;
- to process payments and to create, establish and administer customers' accounts;
- to respond to customer inquiries and complaints;
- to communicate with you, through various channels including telephone, computer or mail using the contact information you have provided and to authenticate the identity of customers contacting GVMi by telephone, electronic means or otherwise.
- for internal training and quality assurance purposes;
- to comply with legal and regulatory requirements and allow GVMi to meet contractual requirements relating to the products and services provided to customers;
- to understand and assess the interests, wants and changing needs of customers with a view to improving our products and services; and
- subject to our customers' right to withdraw consent provided in this Privacy Policy, to [conduct surveys on the quality of our products, services or customer service or to] provide our customers with offers for additional products and services that we feel may be of interest to our customers or that we believe meet our customers' changing needs.

If you have applied for employment with GVMi, the personal information submitted with your job application will be used for recruitment and other customary human resources purposes. For example, we may send you information about new job opportunities within GVMi as well as other career development resources.

For details on the type of information that we collect via our website and on how we use and share this information, please refer to the [Website Privacy](#) section of this Privacy Policy.

Your Consent

GVM I obtains consent from the individuals concerned for the collection, use or disclosure of personal information through various means: orally or through written documents, including the Client Registration Form. In general, by submitting information to us when using GVM I products and services, you are providing your consent to the collection, use and disclosure of personal information as set out in this Privacy Policy. Moreover, by visiting, interacting with and/or using our websites, you agree to benefit from, be bound by, the terms and conditions of this Privacy Policy.

For more information on how GVM I may share your personal information, please refer to the [Sharing of Personal Information](#) section of this Privacy Policy.

Right to Withdraw Consent

Consent may be withdrawn at any time, subject to legal or contractual restrictions and reasonable notice; however, without such consent, GVM I may limit the services or products it is able to provide customers. You may also withdraw your consent as follows:

- **Mail marketing, Telephone marketing and Quality control communications.** You may decide that you prefer GVM I not to use your personal information to promote new and/or additional products and/or services which may be of interest to you and refuse that we contact you by mail or telephone for marketing purposes or by email or telephone for quality control purposes. If this is the case, you may advise us by contacting us at privacy@associatevets.com.
- **Commercial Electronic Communications.** You can always limit the communications that GVM I sends to you. To opt-out of commercial emails, simply click the link labeled “unsubscribe” or “opt-out” at the bottom of any commercial electronic communication we send you. Please note that even if you opt-out of promotional communications, we may still need to contact you with important information about your account. If you have any questions about your choices or if you need any assistance with opting-out, please contact us using the contact information detailed in the How to Contact Us section below.

For information on how you can limit the type of information that we collect, use or share about you when you visit and/or use our website, please refer to the [Website Privacy](#) section of this Privacy Policy.

Sharing of Personal Information

Your information may be made available by GVM I to third-parties or service providers to fulfill the purposes for which it has been collected or as set forth in this Privacy Policy. GVM I will not

sell, rent or trade your personal information to any third party. However, we may share your personal information when authorized by law or as follows:

- **Parent Company.** We may share your personal information with our U.S.-based parent company, VCA Inc., for the purposes of delivering our services to customers, as detailed in this Privacy Policy.
- **Third party or affiliated service providers.** We may hire service providers, which may be affiliates, to perform services on our behalf. This may include, without limitation, a person or an organization retained by GVMI to perform work on its behalf. We provide them with a limited amount of information which is necessary in order for them to provide the services required. They are prohibited from using the information for purposes other than to facilitate and carry out the services they have been engaged to provide. These service providers are not permitted to disclose this information to others. GVMI will strive to protect personal information disclosed to third parties by contractual agreements requiring that those third parties adhere to confidentiality and security procedures and protections that are, at a minimum, equivalent to those employed by GVMI itself.
- **As permitted or required by law.** From time to time, GVMI may be compelled to disclose personal information in response to a law, regulation, court order, subpoena, valid demand, search warrant, government investigation or other legally valid request or enquiry. In these circumstances, GVMI will comply with applicable laws. We may also disclose information to our accountants, auditors, agents and lawyers in connection with the enforcement or protection of our legal rights. We also reserve the right to report to law enforcement agencies any activities that we, in good faith, believe to be unlawful or to law enforcement and emergency services providers, in an emergency or where required or permitted by law.
- **Business transaction.** We may disclose personal information to a third party in connection with a sale or transfer of business or assets, an amalgamation, re-organization or financing of parts of our business. However, in the event the transaction is completed, your personal information will remain protected by applicable privacy laws. In the event the transaction is not completed, we will require the other party not to use or disclose your personal information in any manner whatsoever and to completely delete such information.

Only those employees of GVMI or trusted third party contractors, who need access for business reasons, or whose duties reasonably so require, will be granted access to personal information about customers.

For information on how you can limit the type of information that we collect, use or share about you when you visit and/or use our website, please refer to the Website Privacy section of this Privacy Policy.

Website Privacy

GVMi generally collects and uses personal information from or about its websites visitors and users as follows:

- **Information you provide.** In many cases, we collect personal information directly from you when you visit or use our website. For instance, we may collect the following types of information:
 - **Inquiries.** We may collect your name, contact information, e-mail address and any information you provide us when you make an inquiry or contact us through our websites. We will only use this information to provide you with the information requested or to contact you in order to answer your questions and/or requests.
 - **Requests for a Product and/or Service.** We may collect your name, contact information, e-mail address and any other information provided to us when you sign up to receive our newsletter or when you submit a request or an order for a GVMi product and/or service. We will only use this information to process and answer your request or to manage our everyday business needs in connection with such participation or request.
 - **Communication Services.** We may collect your comments and publication when you post and use the bulletin board services and chat areas, news groups, forums or other communication facilities available through our websites and designated to enable you to communicate with the public at large or with a group.
- **Technical information.** When you visit our website, we may collect, using electronic means such as cookies, technical information. This information may include information about your visit to our website, including the IP address of your computer and which browser you used to view our website, your operating system, resolution of screen, location, language settings in browsers, the site you came from, keywords searched (if arriving from a search engine), the number of page views, information you entered, advertisements you have seen, etc. This data is used to measure and improve the effectiveness of our websites or enhance the experience for our customers. For instance, it may be used to ensure that the services advertised on our websites are available in your area or that we are not showing you the same ads repeatedly. We treat this information as personal information when it is associated with your account or contact information.
- **Your Choice with Cookies.** You can block the use of cookies by activating the settings in your browser. The “Help” feature on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you choose to withhold

consent, or subsequently block cookies, you may not be able to access all or part of the content of our websites. Additionally, you can disable or delete similar data used by browser add-ons, by changing the add-on's settings or visiting the website of its manufacturer.

- **Privacy Policies of Third Parties.** This Privacy Policy only addresses the use and disclosure of information by GVM I [and the websites of its affiliated hospitals]. Other third party websites that may be accessible through GVM I websites, including Vetstreet Inc. which may be used to deliver relevant and timely information to you have their own privacy policies and data collection, use and disclosure practices. We encourage you to familiarize yourself with the privacy statements provided by all third parties prior to providing them with your information.

Personal Information Outside of Canada

In some cases, personal information that we manage may be transferred, processed and stored outside Canada, and therefore may be available to government authorities under lawful orders and laws applicable there.

Security of Personal Information

We will use reasonable security measures to protect your personal information against unauthorized access. GVM I has implemented security measures that contain administrative, technical and physical controls that are designed to safeguard your personal information. For example, we use industry-standard technology to secure sensitive personal information when it is being collected and transmitted over the Internet as well as firewalls, site monitoring and intrusion detection software.

Retention

Personal information will be retained only as long as necessary for the fulfilment of the purposes for which it was collected and for which consent was received, unless otherwise required by law. Personal information that is no longer required to fulfil the identified purposes will be destroyed, erased or made anonymous. GVM I has developed and implemented detailed retention principles, and will ensure destruction of personal information in a method that prevents improper access.

Access and Correction

GVM I respects your right to access and correct your personal information. GVM I complies with all laws regarding access and correction. If you need assistance updating your personal information, please contact your local hospital or the GVM I hospital you have visited for any request to update or amend your personal information. To avoid delays in obtaining your information, please provide sufficient detail to permit us to identify you and the specific

information that you are requesting. Please note that there may be instances where access may be restricted as permitted or required by law. Examples may include information that:

- could threaten the life or security of another individual;
- would reveal personal information about another individual;
- would reveal the identity of someone who provided an opinion about another individual in confidence, when that person does not consent to revealing their identity;
- subject to legal privilege.

How to Contact Us

If you have questions, concerns or complaints regarding this Privacy Policy:

Brandon Zweerman, Chief Privacy Officer
Associated Veterinary Clinics
By email: privacy@associatevets.com

Change of Privacy Policy

GVMi will review and update its policies and procedures as required to keep current with rules and regulations, new technologies, standards and customer concerns. Our Privacy Policy may therefore change from time to time. We will post any privacy policy changes on our website and, if the changes are significant, we will provide a more prominent notice.

This Privacy Policy was last updated on December 1, 2016.

[Please note that both the English and French versions of our Privacy Policy have equal legal value.]

MTL01: 3956003: v3