

## Vetsource® Privacy Policy

Last Updated: January 17th, 2019

This privacy policy (“**Policy**”) explains how Strategic Pharmaceutical Solutions Inc., dba Vetsource (“**Vetsource**”, “**we**”, “**us**”) collects, uses, and discloses information through its websites, platform, mobile applications and other online services that link to this Privacy Policy (collectively, the “**Services**”) or when you otherwise interact with us, including in an individual capacity or on behalf of another entity. If you obtain your use of the Services in connection with the services offered by a third party, the individual terms of that third party’s contract with us and its own privacy policy may differ from what is described in this Policy.

### Changes to our Privacy Policy.

We may update this Policy from time to time. If we make updates to this Policy, we will notify you by revising the date at the top of the Policy and, in some cases, we may provide you with additional notice (such as adding a statement to our homepage or sending you a notification). We encourage you to check this Policy whenever you use any of our Services or otherwise interact with us to stay informed about our Policy and the choices available to you.

### What information do we receive?

We receive information from you in various ways when you use our Services.

**Information You Give Us.** We receive information from you through our Services, and when you register for and use our Services. Examples include the following:

- **Registration and Practice Information.** When you register to use our Services or update your profile, you provide us various kinds of information about you including your name, email address, license number, company name, company title as well as other information you provide.
- **Client Information.** You or your clients provide us information in order to integrate your client management database, fulfill orders and perform our obligations under the Services. Such information may include client contact information, address, billing information, pet information (such as breed, age, weight, etc.), prescriptions, order history, appointments and other such information in connection with the Services.
- **Submissions and Vetsource Surveys.** From time to time we may request your participation in surveys, contests or sweepstakes that may request personal or demographic information and customer feedback.

**Automatically Received Information.** We automatically receive certain types of information when you interact with our Services including:

- **Log Information:** We receive log information about your use of the Services such as the type of browser you use, app version, access times, pages viewed, your IP address and the page you visited before navigating to our Services.
- **Device Information:** We receive information about the computer or mobile device you use to access our Services such as the hardware model, operating system and version, unique device identifiers and mobile network information.
- **Information from Cookies and Other Tracking Technologies:** Like most online services and mobile applications, we may use cookies and other technologies, such as web beacons, web storage, and unique advertising identifiers, to collect information about your activity, browser and device. This information helps us improve our Services and your experience, see which areas and features of our Services are popular, count visits, personalize and improve your experience, record your preferences, understand usage and campaign effectiveness and allow you to use our Services without re-entering your member ID and/or password. For more information about cookies and how to disable them, please see "**Your Choices**" below.

### How do we use your information?

We use your information to process your requests or transactions, to provide you with information or services you request, to inform you about other information, events, promotions, products or services we think will be of interest, to facilitate your

use of, and our administration and operation of, the Services and to otherwise serve you and your customers. For example, the information we receive from you may be used in the following ways:

- Populate your customer database for you to easily write prescriptions, place orders, track order history, and provide other services;
- Send you technical notices, updates, security alerts and support and administrative messages and to respond to your comments, questions and customer service requests;
- Communicate with you about products, services, offers, and events offered by Vetsource and partners, and provide news and information we think will be of interest to you;
- Monitor and analyze trends, usage and activities in connection with our Services;
- Detect, investigate and prevent fraudulent transactions and other illegal activities and protect the rights and property of Vetsource and others;
- Personalize and improve the Services and provide content or features that match user profiles or interests;
- Facilitate contests, sweepstakes and promotions and process and deliver entries and rewards; and
- Process your transactions.

#### **When is information shared and to whom?**

We will not share information about your clients or pet owners unless we have your consent to do so, for example, to provide the Services, or as necessary to protect the rights, property, or safety of others.

We may share information about you as follows or as otherwise described in this Policy:

- With distributors and manufacturers who track your purchases in order to count these sales towards your purchase goals, pay commissions to their representatives and for their own services and marketing purposes;
- With vendors and other service providers who need access to such information to carry out work on our behalf in connection with the Services including our third party payment processors;
- In response to a request for information if we believe disclosure is in accordance with, or required by, any applicable law or legal process, including lawful requests by public authorities to meet national security or law enforcement requirements;
- To protect the rights, property and safety of Vetsource or others, or if we believe your actions are inconsistent with our user agreements or policies;
- In connection with any merger, sale of company assets, financing or acquisition of all or a portion of our business by another company;
- Between and among Vetsource and our current and future affiliates, subsidiaries and other companies under common control and ownership; and
- With your consent or at your direction.

We may also share aggregated or de-identified information, which cannot reasonably be used to identify you or your clients.

#### **Analytics Services.**

We may allow others to provide analytics services on our behalf. These entities may use cookies, web beacons, device identifiers and other technologies to collect information about your use of the Services and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in apps, links clicked and conversion information. This information may be used by Vetsource and others to, among other things, analyze and track data, determine the popularity of certain content, deliver content targeted to your interests on our Services, and better understand your online activity.

#### **Security.**

Vetsource takes reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

**Data Retention.**

We store the information we receive about you for as long as is necessary for the purpose(s) for which we originally received it. We may retain cached or archived copies of information about you for a certain period of time for legitimate business purposes, for example as backups, or as required by law.

**Data Transfers.**

Vetsource is based in the United States and we process and store information in the U.S. Therefore, we and our service providers may transfer your information to, or store or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction. We will take steps to ensure that your personal data receives an adequate level of protection in the jurisdictions in which we process it.

**Your Choices.***Updating Personal Information*

You may update, correct or delete information or deactivate your account at any time by logging into your online account to the extent such feature is available or by contacting us. If your personal information changes in any way, you must correct or update your information in order to utilize the Services.

*Cookies*

Most web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove or reject browser cookies. Please note that if you choose to remove or reject cookies, this could affect the availability and functionality of our Services.

*Communications*

You may opt-out of receiving promotional communications from Vetsource by following the opt-out instructions provided in those messages, logging into your online account or by contacting us. If you opt out, we may still send you non-promotional emails, such as those about your account or the Services.

*Push Notifications/Alerts*

We may send promotional and non-promotional push notifications or alerts to your computer or mobile device. You can deactivate these messages at any time by changing the notification settings on your computer or mobile device.

*Your California Privacy Rights*

California law permits residents of California to request certain details about how their information is shared with third parties for direct marketing purposes. If you are a California resident and would like to make such a request, please contact us at the contact information below.

**Contacting Us**

If there are any questions regarding this privacy policy, you may contact us using the information below.

[www.vetsource.com](http://www.vetsource.com)

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