



MEDDS PRIVACY POLICY

INTRODUCTION AND DEFINITIONS

This privacy policy (the "Privacy Policy") constitutes an agreement between the pharmacy "PHARMACY" (collectively, "PHARMACY", "you", "your") and MEDDS Delivery "MEDDS" name and software for your local jurisdiction (as indicated in our Terms of Use) and its affiliates and subsidiaries (collectively, "MEDDS", "us", "our" or "we"). MEDDS is dedicated to protecting the privacy rights of PHARMACY and their clients. This Privacy Policy describes how MEDDS collects, protects, uses and discloses information and data created in the course of PHARMACY access to and use of the Site, Content and/or Services (each as defined below). Please note that this Privacy Policy applies only to information collected through the Site, Content and/or Services – it does not apply to information PHARMACY discloses to MEDDS through offline correspondence or personal contact with MEDDS dispatch/representatives.

If you have any questions or concerns after reading this, please email us at: MEDDSPrivacy@ats.ca.

For the purposes of this Privacy Policy:

"Content" means any expression fixed in a tangible medium and includes, without limitation, ideas, text, comments, video, audio, images, graphics, designs, drawings, animations, logos, trademarks, copyrights, information, data, software, scripts, tasks, activities, badges and ranks, and any intellectual property therein, any of which may be created, submitted, or otherwise made accessible on or through the Site and/or Services.

"Services" means all services made available by MEDDS, including but not limited to services accessed through the Content or the Site in which the PHARMACY at their request have MEDDS pickup from location and deliver to location in accordance with the instructions received from the PHARMACY.

"Site" means www.atsmedds.ca and MEDDS's mobile applications.

"User Generated Content" or "UGC" means any Content whatsoever PHARMACY submits, creates, uploads, transfers, or otherwise makes available by access to the Site or through the Services, including but not limited to messages, information, images, data or in-media screen shots, video, audio or other Content posted in any public or private area within the Site or through the Services.



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ACCEPTANCE OF TERMS AND REVISIONS

By accessing the Site, submitting information to MEDDS or downloading, installing or using any of the Content or Services, PHARMACY consents to the collection and use of information by MEDDS in accordance with this Privacy Policy. If PHARMACY does not accept this Privacy Policy it must not submit information to or register an account with MEDDS, access the Site or download, install or use any of the Content or Services.

MEDDS reserves the right to revise this Privacy Policy at any time. MEDDS will give you notice of such revisions by posting the revised Privacy Policy at www.atsmedds.ca/Home/Privacy. It's the PHARMACY's responsibility to ensure awareness of the current Privacy Policy when it access or use the Site and/or Services. If PHARMACY continues to access or use any of the Site and/or Services after any revisions to this Privacy Policy posted, you will be deemed to have accepted those revisions.

TYPES OF INFORMATION WE COLLECT

There are two types of information MEDDS collects through the PHARMACY's access and use of the Site, Content and/or Services:

(a) "Personal Information" means information about an identifiable individual (including any "Personal Information" as such term is defined in the *Personal Information Protection and Electronic Documents Act*, Canada or the *Personal Health Information Protection Act*). Personal Information may include, but is not limited to, a person's name, email address, residential address, precise geolocation information (i.e., your specific location) and telephone number.

(b) "Non-Personal Information" means information that does not identify you and cannot be used to contact you personally and may include postal code, non-precise geolocation information (e.g., your city/town) and user login history.



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The choice to provide MEDDS with Personal Information and Non-Personal Information is at PHARMACY's discretion. If PHARMACY does not wish to have MEDDS collect Personal Information through the use of our Site, Content and/or Services, PHARMACY can choose not to provide it. However, the decision to withhold particular details may limit the Services MEDDS are able to provide and make it more difficult for MEDDS to advise PHARMACY appropriate alternatives to our Services. If MEDDS are unable to accommodate the requests based on the information provided, MEDDS may ask for additional information to better accommodate PHARMACY's needs.

APPLICATION OF THIS PRIVACY POLICY

This Privacy Policy only applies to the information that MEDDS collects and uses, or is supplied, through the access to and use of the Site and/or Services.

CONSENT

BY SUBMITTING PERSONAL INFORMATION TO MEDDS, THE PHARMACY AGREES THAT MEDDS MAY COLLECT PERSONAL INFORMATION AND CONSENTS TO THE USE OF INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND AS PERMITTED OR REQUIRED BY LAW. Subject to legal and contractual requirements, the PHARMACY may refuse or withdraw consent to certain of the purposes identified herein at any time by contacting MEDDS through the contact details provided below. If PHARMACY refuses or withdraw consent, they acknowledge that MEDDS may not be able to provide or continue to provide Services which may be of value.



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COLLECTION OF INFORMATION

MEDDS may collect information (including Personal Information) as follows:

- (a) Information Provided to MEDDS. When an account is opened with MEDDS we may collect information such as name, email address, telephone number and address. This information is necessary for verifying identity and contacting PHARMACY in regards to Services. If you choose to submit information to MEDDS for any other reason in any other form, MEDDS will collect such information and use it for the purposes for which it was submitted. Data is stored in a SQL database for 7 years after which it will be archived. Data is stored in the MEDDS Primary Data Centre and at MEDDS Secondary Data Centre (Disaster Recovery Site). All data transmission is encrypted with monthly backup tapes kept at Iron Mountain. Backup tapes are kept for 7 years from the date of backup.
- (b) In-Media Communications. If PHARMACY chooses to send messages through email or other function, MEDDS may collect any information you may disclose through such means in order to facilitate the communication and provide Services.
- (c) Visiting our Site. MEDDS will not collect any Personal Information from PHARMACY simply by virtue of visiting our Site; MEDDS will only collect Personal Information that is submitted to us. MEDDS however, collect Non-Personal Information such as login history, whenever PHARMACY uses our Site and/or Services. Such Non-Personal Information is not combined with Personal Information unless you choose to submit Personal Information to us.
- (d) Where Permitted by Law. We may also collect information, including Personal Information as otherwise permitted by law.
- (e) "Cookies". MEDDS may use "cookies" or similar technologies to gather information for Site optimization. MEDDS does not collect cookies. In connection with the foregoing collection of information, MEDDS may also use "cookies"However, please be aware that some of our Site, Content and/or Services will not function properly if you do so and you may lose access to Services you purchased.



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USE OF YOUR INFORMATION

MEDDS may use your information (including Personal Information) for administrative, analytical, security and other purposes, including, without limitation, the following purposes:

- (a) to develop, enhance services and functionality that you have requested, including the Services;
- (b) to improve our Site and/or Services, and to inform the creation of future Services;
- (c) to send you information related to our Site /or Services, including confirmations, technical notices, updates, security alerts, support and administrative messages;
- (d) to process transactions for the Services;
- (e) to manage your account with MEDDS;
- (f) to track your access to and use of our Site and/or Services to help us learn more about your Site and/or Services access and usage, Content consumption and understand your preferences and tendencies so that we can personalize your experience, provide you with offers and notifications that are tailored to you, and otherwise enhance your experience when viewing Content and using our Site and/or Services;
- (f) to respond to customer service inquiries;
- (g) to troubleshoot problems with the Site and/or Services;
- (h) to enforce our Terms of Use
- (i) to protect against unlawful activities or other misuse of the Site, Content and/or Services or for other security reasons;
- (h) for any other purpose to which you consent or that is otherwise permitted or required by law.

By providing Personal Information through the access to, or use of, our Site, Content and any of our Services, PHARMACY acknowledges and agrees that MEDDS may use the Personal Information for the purposes set out in this Privacy Policy and by accessing and using information submitted to us, you also agree that we may use the Non-Personal Information for the purposes set out in this Privacy Policy.



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DISCLOSURE OF INFORMATION

MEDDS does not sell or provide information to third parties. Notwithstanding the foregoing, we reserve the right to disclose information, including Personal Information, if we reasonably believe that we are required to do so by law or legal process or if we are otherwise requested by any law enforcement officer or agency acting under color of law. In addition, we reserve the right to disclose Personal Information and Non-Personal Information in order to: (a) enforce the Terms of Use; (b) investigate and/or take action against unlawful activity, suspected abuse or unauthorized use of the Site and Services; (c) protect and defend the rights or property of MEDDS; or (d) act in urgent circumstances, including medical emergencies, to protect the safety or security of the public or users of the Site and/or Services. Subject to applicable privacy laws, we may also disclose your information (including Personal Information) in connection with a corporate re-organization, a merger or amalgamation with another entity, or a sale of all or a substantial portion of our assets provided that the information disclosed continues to be used for the purposes permitted by this Privacy Policy by the entity acquiring the information and if we do so, we will notify you that such a transaction has taken place and that your Personal Information has been disclosed.

PROTECTION OF YOUR INFORMATION

As required by applicable privacy laws, MEDDS has implemented reasonable physical and technical measures to protect the information we collect. Further, while we attempt to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining access to this information. We do not warrant or represent that your information will be protected against, loss, misuse, or alteration by third parties. No method of transmission over the Internet, or method of electronic storage, is 100% secure.

TO THE MAXIMUM EXTENT PERMITTED BY LAW, WE EXPRESSLY DISCLAIM ANY GUARANTEE OF SECURITY IN CONNECTION WITH YOUR PERSONAL INFORMATION.

For further information on how we safeguard information we collect or are provided with, contact us via email at MEDDSPrivacy@ats.ca.



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RETENTION OF YOUR INFORMATION

The data and information that we collect will be stored and maintained by MEDDS or our third party service providers until you delete it or instruct us to delete it.

ACCOUNT SECURITY

If you access our Site and/or use any of our Services, you are responsible for protecting the confidentiality of your account password and elected codes, and for restricting access to your computer, device or media system platform, and you agree to accept responsibility for all activities that occur under your account. Please notify us immediately if you detect suspected breach or misuse of your account.

ACCESS AND ACCURACY

MEDDS will use reasonable efforts to provide PHARMACY access to Personal Information (to the extent we are in possession of any) if PHARMACY submits request for access via MEDDSPrivacy@ats.ca. Subject to applicable law, MEDDS reserves the right to deny access to your Personal Information on any of the following grounds:

- (a) when denial of access is required by law;
- (b) when granting you access is reasonably likely to negatively impact other people's privacy;
- (c) when granting access is, in our judgement and acting reasonably, cost prohibitive; or
- (d) when we have reason to believe that such requests are frivolous or made in bad faith.

PHARMACY is responsible for ensuring that all information created through access and use of the Site and/or Services is accurate, reliable and complete and you acknowledge and accept that the use of such information is at PHARMACY's risk. MEDDS ask that the Personal Information provided is current and correct. If you believe that the Personal Information maintained by MEDDS is inaccurate or incomplete, you may notify MEDDS by describing in detail any inaccuracies or omissions via email at MEDDSPrivacy@ats.ca. Following



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receipt of a properly submitted notice, MEDDS will, within a reasonable time period and acting in our sole discretion, use commercially reasonable efforts to either: (a) amend or correct Personal Information to reflect corrected or additional information provided by PHARMACY, or (b) in connection with Personal Information, make note of any claimed inaccuracies or omissions reported in the notice submitted by PHARMACY.

GOVERNING LAW

Those who choose to use or access the Site and/or Services from outside Canada do so on their own initiative and are responsible for compliance with local laws, if and to the extent local laws are applicable. Notwithstanding the foregoing, and recognizing the global nature of the Internet, each viewer and user shall comply with all local rules regarding online conduct and submission of acceptable materials. This Privacy Policy is governed and interpreted pursuant to the laws of the applicable province where PHARMACY is located and the federal laws of Canada applicable therein, without regard to principles of conflicts of law that would impose the law of another jurisdiction, and you accept and submit to the exclusive jurisdiction of the courts located within the province where the PHARMACY is located.

QUESTIONS OR COMMENTS

We welcome questions or comments about this Privacy Policy. Please direct any questions or comments to the individual below who oversees MEDDS compliance with privacy requirements:

ATS MEDDS
Attention: Privacy Officer
100 Vaughan Valley Blvd
Vaughan, ON L4H 3C5

MEDDSPrivacy@ats.ca