



# Privacy Policy

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## Introduction

At Covetrus, we're committed to protecting the privacy and security of your information. Whether you are a veterinary healthcare provider or a pet or horse owner, we know the privacy of your information is important. This policy is designed to help you understand what information we collect, why we collect it, how we use it, and how you can manage your information with us. Covetrus strives to improve the health of companion animals and horses, and to improve the experience of the people involved along the way. Information you provide to us allows us to alert pet owners when their pet's medication is running out, to notify veterinary healthcare providers when a patient is overdue for a visit, or to make sure we always stock enough of the products you rely on us to provide. In order to do these things, we collect both personal and non-personal information in a few different ways.

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## Information you provide to us

We collect information at several different points as we interact with you. This includes when you create an account, order from the online store, chat with customer service, speak with your account representative, use one of our products or services, register for our newsletter, participate in promotions, or participate in surveys. The information we collect includes things like the name of a pet owner or veterinarian, a pet's name, pet health updates, mailing addresses, email addresses, telephone numbers, payment information, and passwords.

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## Information we collect when you use our product and services

When you use our products and services, we collect information about how you are using them and how well those products and services are working. For example, this can include usage data, device data, or patient information management systems (PIMS) data. Our products, websites and emails utilize technology to collect information. This includes things like web beacon data in emails, and via cookies and flash cookie data and device data such as IP addresses, operating system types, and browser types when you use our website. You can adjust your settings in your device browser to disable some of these if you prefer not to share this information. We also collect data when you use our veterinary healthcare products, including information in user accounts. Each of our veterinary healthcare products is subject to your consent when you subscribe to the product, and each product has its own terms and conditions. You can withdraw your consent at any time by unsubscribing from the product and discontinuing use.

## What we do with data — Veterinary healthcare providers

For veterinary healthcare providers accessing our website, platform, PIMS systems, or other products, or downloading apps from our websites, we collect data in user accounts, and we may access, use and archive information, including to ensure that digital prescriptions and patient records are always consistent, and that you have a complete view of your patient records. We may share your clinic's name, sales volume, and products sold with manufacturers and other industry partners in order to comply with contractual obligations, such as providing information to our manufacturers as an authorized distributor of a product subject to drug supply chain security and transparency reporting requirements, or for manufacturer marketing purposes. Our websites, platforms, products, and apps may also each be subject to additional terms and conditions. In addition:

- We do not share personally identifiable information from your customers (including pet owner names, addresses, emails, telephone numbers, or health information on an individually identifiable animal), with any other veterinary healthcare providers, corporate veterinary groups, industry partners, manufacturers, or anyone else, without your express consent to share that information.
- We may share your own data with you, as a veterinary healthcare provider, so you can use that information to deliver the best possible care to your patients.
- We share data analytics, based on de-identified information, with manufacturers and industry partners. For example, this may include data such as total sales of a medication in a certain region or overall compliance percentages of animals with a particular disease, in order to identify trends in the market and inform overall animal care outcomes.
- We work with manufacturers on targeted manufacturer marketing programs. Your participation in any targeted manufacturer marketing program is on an opt-in basis, and any non-de-identified data would only be shared with manufacturers with your consent.

## What we do with data — Pet and horse owners

For pet and horse owners accessing veterinarian storefronts or otherwise using our services, we collect data to help improve your user experience, and help identify and close gaps in your animal's care. Information we collect provides insights, which we help turn into action, which means healthier and happier pets and horses!

- We share information with your veterinarian, including any medication or prescription diet purchases you make, so that it can be added to your animal's medical records.
- We use your information to provide customer service to you, like checking order status or working with your veterinarian to confirm your prescription.
- We do not share your personal information in any way that is not covered in this policy without getting your consent first

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## What we do with data — All users

When you use our products and services, we may also use your information:

- In order to maintain and improve our products and services by making sure they are working well. For example, knowing which pages of our website frequently result in calls from confused customers helps us know where we need to improve our site design.
- To help develop new products and services. For example, tracking the number of calls for basic pharmacy refills enabled us to develop a Refill App to make things easier on our pet owners.
- In order to personalize your experience with our products and services according to the information we collect. This means we talk to cat owners about cats, and dog owners about dogs — or we remind you when your prescription needs to be refilled so that it arrives before your current medication runs out.
- To provide services to you, including through our contractors. This includes sharing your address with providers of delivery services like UPS or FedEx, or sharing information with third parties that provide Covetrus with email solutions, cloud hosting services, payment processing, website support and maintenance, and legal, regulatory, or audit services.
- For regulatory compliance. We maintain prescription records as required by state and federal law, and we may share your personal information to comply with state boards of pharmacy, DEA, FDA, and other regulatory agency laws, rules, and regulations. This can include providing required personal information in connection with mandatory controlled substance prescription disclosures to state regulatory agencies, and providing disclosures of prescription records in response to state or federal regulatory agency request.
- For legal reasons. We may share your personal information to comply with inquiries from governmental authorities, or to protect, defend, exercise legal rights or claims, in connection with end user license agreements, terms of service or other applicable agreements, or as otherwise required by law. If we are legally required to share your information, we will attempt to notify you, unless such notification would violate law or court order.
- In the event of business transfer. If Covetrus is involved in a sale of assets, merger, acquisition, business transfer, or other change of control, we may share your information with other entities involved. We will require any such successor business entity to honor this Privacy Policy, and we will notify you of any changes that could affect your information. In the event of a business transfer, unless we are otherwise required by law to retain or provide your information to the other entity, you may request that your information be deleted from our records.

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## Managing your data

- Websites. You can adjust and manage the privacy of your information via our websites, which allow you to opt out of certain features that we offer. By adjusting your device or

browser settings, you can manage information by adjusting your personal profile, your subscriptions, your cookies, and your location services.

- Email. You can opt out of emails through links in the emails you receive from us. Every email you receive from us will give you the ability to unsubscribe from receiving future emails.
- Products. All use of products is subject to the user consent in the product's subscription terms and conditions for each product. You can withdraw your consent at any time by unsubscribing from the product and discontinuing use.
- By Contacting Us. You can also contact us anytime at [support@Covetrus.com](mailto:support@Covetrus.com) if you would like to change or update your personal information. In some cases, we may have to keep certain information for legal or business reasons (like prescription records).

## How we protect your data — Technical safeguards

The security and confidentiality of your information is extremely important to us. We have implemented technical, administrative, and physical security measures to protect your information. As part of our efforts to protect your information, we have technical safeguards in place across our products and services, which may include the following:

- Requiring a password or a unique token in order for you to access your personal information;
- Using firewalls to protect information held in our servers;
- Utilizing Secure Socket Layer (SSL) encryption in transmitting personal information to our servers;
- Limiting the number of personnel who have potential access to personal information; and
- Routinely backing up the systems to protect the integrity of personal information.

There is always some risk that an unauthorized third party may find a way around our security systems. In the event of a security breach, the first thing we would do is notify you. This notice would include what happened, what information was breached, what Covetrus is doing to respond, and who to contact with questions.

## Protecting children's privacy

Covetrus does not knowingly sell products to, solicit, collect or retain personal information about children under the age of 18 without parental consent. If we learn that a child under 18 has submitted information to us without parental consent, we will take all reasonable measures to delete it from our databases and not use the information for any purpose (except where necessary to protect the child or others). If you become aware of any personally identifiable information we have collected from children under 18, please contact us at [legal@Covetrus.com](mailto:legal@Covetrus.com).

## About this policy

We comply with data privacy regulations applicable in the jurisdictions in which we operate. We review and may revise this policy from time to time as we add new features and services, as laws change, and as industry best practices evolve. We indicate the date the most recent changes were published on this page. If we update the privacy policy with significant changes, we will let you know, for example by placing a note on our website. Please review this policy periodically, and especially before you provide any information to us.

This Policy applies to website visitors, veterinary healthcare providers, pet and horse owners, application and product users, and other customers of Covetrus, Inc. and its affiliated entities and business units in the United States including Covetrus North America; Covetrus Software Services including Covetrus Connect and VetData; and Covetrus Global Prescription Management, including the former Vets First Choice business and all Covetrus pharmacies and outsourcing facilities including Covetrus TX, Covetrus Maine, Covetrus NE, Roadrunner Pharmacy, and Atlas Pharmaceuticals. By using our website, downloading any application from our web site, or using our products or services, you signify your acceptance of this privacy policy.

This Privacy Policy doesn't apply to other companies that advertise our services, or to services offered by other companies, including those that may be linked to from our services.

## How to contact us with questions

If you have any questions about this policy or our practices at Covetrus, please contact us.

Covetrus, Inc.  
7 Custom House Street  
Portland, ME 04101

Policy Updated: December 31, 2019

**covetrus** 

# California Privacy Supplement

This CALIFORNIA PRIVACY SUPPLEMENT (“Supplement”) is in addition to the information contained in the Covetrus Privacy Policy and applies to California residents. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other related privacy laws. Any terms defined in the CCPA have the same meaning when used in this supplement.

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## **Covetrus customers, products and services**

Where a Covetrus customer interacts with Covetrus products and/or services, including, but not limited to Covetrus websites, applications, services and products, Covetrus collects information on California residents that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“Personal Information”). We may obtain data provided by veterinarian customers, directly from individuals using Covetrus products and services such as websites or applications, and from consumers purchasing goods or services from Covetrus. Covetrus has collected the following categories of Personal Information from consumers located in the State of California within the last twelve (12) months:

- Identifiers including names, mailing addresses, unique personal identifiers, ISP addresses, account names, social security numbers, driver license numbers, and other similar identifiers;
- Personal information under Cal. Civ. Code Sec. 1798.80 including names, social security numbers, telephone numbers, driver license numbers, credit card numbers, account numbers, and other financial information of Covetrus customers who have purchased goods or services;
- Commercial information such as products or services purchased, and purchasing history; and
- Internet or similar network activity such as browsing history, search history, or users' interaction with Covetrus websites, apps, or ads.

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## Job applicants and employees

In addition to Personal Information set forth above, Covetrus also collects information provided by job applicants and employees of Covetrus. Covetrus has collected the following categories of Personal Information from job applicants and employees located in the State of California within the last twelve (12) months:

- Protected classification characteristics such as age, race, ancestry, national origin, marital status, medical conditions, and veteran status; and
- Professional or employment related information including job history or performance evaluations.

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## Excluded information

Covetrus does not collect biometric information, geolocation data, audio, visual, thermal, olfactory or other sensory data, educational records, non-public Family Education Rights and Privacy Act related data, or inferences drawn from Personal Information. Personal Information does not include information that is de-identified or aggregated, publicly available in government records, and information otherwise excluded from CCPA's scope including pursuant to the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and other excluded state and federal laws.

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## Use of personal information

Covetrus uses Personal Information as set forth in the Covetrus Privacy Policy. Covetrus has not sold the Personal Information of any California resident in the last 12 months.

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## Deletion requests ('Right to Forget')

Covetrus complies with your rights regarding your Personal Information, including the right to request deletion of your Personal Information. Where Covetrus receives a validated request, and Covetrus is not otherwise legally obligated to retain such Personal Information, Covetrus will delete your Personal Information. Covetrus may deny your deletion request where it is legally required to retain your Personal Information, including as follows:

- Where Covetrus has a legal obligation to retain your Personal Information, in conformity with state or federal laws that require the storage of prescription records, records related to the

sale of controlled products, veterinary board data retention requirements, and where otherwise subject to state or federal law requiring the retention of data;

- Where it is necessary to protect you from unwanted data misuse, fraudulent activity, or to maintain the security of data, data security, and in the protection of data security incidents;
- Where retention of data by Covetrus is to comply with a legal or contractual requirement to a Covetrus customer, such as a veterinarian who is required by veterinary board rules to retain your Personal Information related to your pet's medical records; and
- To make use of any Personal Information pursuant to other recognized exceptions in the CCPA.

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## CCPA requests

Requests to access or delete Personal Information may be made by calling 888-280-2221 or by completing the form below. Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your child. You may only request access or deletion of Personal Information twice in any 12 month period. Your request must contain a valid email address and describe within sufficient detail such that Covetrus may evaluate and respond to such request. Covetrus will not respond to requests without a verifiable email address. Making a request does not require you to create an account, and Covetrus will only use information in the request form to verify your authority to make the request and verify your identity. Covetrus does not discriminate against anyone making a CCPA request, and will not deny goods or services, charge different prices, or provide a different level of quality of goods or services based on any CCPA request. Covetrus will comply with the statutory time periods in which to respond to any CCPA request, and where we require additional time to comply with a request, we shall communicate with you on that request via email. We may also respond via email stating the reasons why we cannot respond to your request, cannot verify you, or cannot comply with a request. Where data is requested, Covetrus will select a format to provide a response to allow you to transmit that information to another entity. Where requests are deemed by Covetrus to be excessive, repetitive, or unfounded, Covetrus may charge a fee for responding to your request.

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## About this supplement

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all Covetrus pharmacies and outsourcing facilities including Covetrus TX, Covetrus Maine, Covetrus NE, Roadrunner Pharmacy, and Atlas Pharmaceuticals.

### **Changes to CA supplement**

Covetrus may change or amend this supplement at any time, and any changes shall appear on the Covetrus website at [www.covetrus.com](http://www.covetrus.com).

### **Contact**

You may contact Covetrus about your rights under CCPA as follows:

**888-280-2221**

[privacy@covetrus.com](mailto:privacy@covetrus.com)

**Christopher Neumann, Data Privacy Officer**

7 Custom House St.

Portland, ME 04101

Questions or comments? Contact us at (888) 280-2221 Or visit us at [covetrus.com](http://covetrus.com)