

Privacy Policy

Last Update: December 27, 2023

INTRODUCTION AND DEFINITIONS

This privacy policy (the “Privacy Policy”) constitutes an agreement between you, or if you are under the age of majority in your local jurisdiction, your parent or legal guardian (“user,” “you” or “your”) and the dispensing pharmacy licensing the “NowPills ” name and software for your local jurisdiction (as indicated in our Terms of Use) and its affiliates and subsidiaries (collectively, “NowPills ”, “us”, “our” or “we”). NowPills is dedicated to protecting the privacy rights of our users. This Privacy Policy describes how NowPills collects, protects, uses and discloses information and data created during your 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 data you disclose to NowPills through offline correspondence or personal contact with NowPills representatives.

If you have any questions or concerns after reading this, please email us at pharmacy@nowpills.ca.

For 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.

“Minor” means a person under the age of majority in the jurisdiction of the dispensing pharmacy.

“Patient Representative” means a person who is authorized to act on the patient’s behalf to manage the patient’s prescriptions and Services.

“Services” means all services made available by NowPills, including but not limited to services accessed through the Content or the Site.

“Site” means nowpills.ca, its related webpages and sites (including, without limitation, any mobile optimization website), and NowPills’ mobile applications.

“User Generated Content” or “UGC” means any Content whatsoever that a user, including you, 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 screenshots, video, audio or other Content posted in any public or private area within the Site or through the Services.

ACCEPTANCE OF TERMS AND REVISIONS

By accessing the Site, submitting information to us (regardless of whether you register an account with us) or downloading, installing or using any of the Content or Services, you consent to collecting and using your information by NowPills by this Privacy Policy. If you do not accept this Privacy Policy, you must not submit information to or register an account with us, access the Site, download, install, or use any of the Content or Services.

We reserve the right to revise this Privacy Policy at any time. We will notify you of such revisions by posting the revised Privacy Policy at www.NowPills.ca/privacy. You must ensure that you know the current Privacy Policy when you access or use the Site and/or Services. If you continue to access or use any of the Site and/or Services after any revisions to this Privacy Policy are posted, you will be deemed to have accepted those revisions.

TYPES OF INFORMATION WE COLLECT

There are two types of information we may collect through your access to and use of the Site, Content and/or Services:

- “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 Information Protection Act*, Alberta). 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), telephone number, date of birth, care card or provincial personal health number, medication and prescription information, information regarding allergies, medical history, gender, insurance information, payment card information, transaction history, other billing information, occupation, employment status, and in some cases, user name. When signing up for health-related services or ordering prescription drugs, Personal Information may also require you to provide specific physical and mental health information, including but not limited to personal and family medical history information, details of your existing medications, the existence of drug allergies, medications requested and prescription information, the name of your primary physician and his or her contact information, your provincial health number and any private health benefits number or account information.
- “Non-Personal Information” means information that does not identify you and cannot be used to contact you personally and may include your date of birth, age, gender, postal code and non-precise geolocation information (e.g., your city). Non-personal information includes “Usage Data,” which is anonymous data associated with your computer, mobile device, and/or media system platform with in-media time, activities, purchases, badges and ranks.

If you connect your Google, Apple or other third-party accounts with us, we may collect both personal and non-personal information from those accounts for providing our services. This is dependent on the privacy policies or

settings for those accounts. We will not share the data collected with any third party. You may limit what data you provide to NowPills from such third parties.

The choice to provide us with Personal and Non-Personal Information (notwithstanding Usage Data) is yours. If you wish to refrain from having NowPills collect your Personal Information through our Site, Content and/or Services, you can choose not to provide it. However, your decision to withhold particular details may limit the Services we can offer and make it more difficult for us to advise you or suggest appropriate alternatives to our Services. If we cannot accommodate your requests based on the information you have provided, we may ask for additional information to better accommodate your needs.

APPLICATION OF THIS PRIVACY POLICY

This Privacy Policy only applies to the information that NowPills collects and uses, or is supplied, through accessing and using the Site and/or Services. NowPills is not responsible for the actions of any third parties, the content of their websites, the use of information you provide, or any products or services they may offer. Any information you disclose to a third party is dealt with by the privacy policies each party adopts. Individuals are encouraged to review the privacy policies maintained by each of those third parties to understand how those entities will use their information to process requests. For example, we partner with third-party service providers and vendors to provide access to existing payment gateways and your credit card, banking and other billing information is kept with our payment processor, Moneris; you can read about its privacy policy at the following link: <https://www.moneris.ca/en/Privacy-Policy>

The Site, Content and/or Services may contain links to third-party websites (the “Linked Sites”) not controlled or operated by NowPills. Linked Sites are offered solely as a convenience to you and do not constitute our sponsorship or endorsement of, or affiliation with, those third parties. The Linked Sites are maintained by third parties who have their privacy policies and their terms and conditions of use. This Privacy Policy does not apply to any of the Linked Sites, and NowPills is not responsible for any information disclosed to or collected by those Linked Sites or for the privacy practices of any operators or sponsors. The fact that we link to a website is not an endorsement, authorization or representation of our affiliation with that third party. Because we cannot control the activities of third parties, we do not accept responsibility for any use of your information by such third parties, and we do not guarantee that they will adhere to the same privacy and security practices as NowPills. To determine how your information will be treated when accessing or using the Linked Sites, you must read the privacy policy, if any, that applies to each.

CONSENT

BY SUBMITTING PERSONAL INFORMATION TO **NOWPILLS**, YOU AGREE THAT **NOWPILLS** MAY COLLECT YOUR PERSONAL INFORMATION, AND YOU CONSENT TO THE USE, DISCLOSURE AND TRANSFER OF YOUR PERSONAL INFORMATION BY THIS PRIVACY POLICY AND AS PERMITTED OR REQUIRED BY LAW. Subject to legal and

contractual requirements, you may refuse or withdraw your consent to specific purposes identified herein at any time by contacting NowPills through the contact details provided below. If you refuse or cancel your permission, you acknowledge that NowPills may not be able to provide you or continue to provide you with certain Services that may be valuable to you.

COLLECTION OF INFORMATION

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

- Information You Provide to Us. When you open an account with us, request support, or in any other way take steps that require the submission of information, we may collect information such as your name, email address, telephone number, date of birth, gender, provincial personal health number, information regarding allergies, medical history, insurance and payment information, employment status, occupation and username. This information is necessary for verifying your identity, fulfilling your orders, contacting you regarding your prescription and providing you with the Services. We store your information to verify your identity with Netcare.
- Information Provided to Us by Your Patient Representative or by a User for whom you will be a Patient Representative. If a user wishes to have you act as the user's Patient Representative to manage the user's prescriptions and Services, we may collect information about you from that user, such as your name, email address, telephone number, date of birth and gender. If another user wishes to act as a Patient Representative, we may collect your name, email address, telephone number, date of birth and gender. If you are a user and you are a parent or guardian of a minor and wish to act as a Patient Representative for the minor to manage the minor's prescriptions and Services, we may collect from you the minor's name, date of birth and gender. This information is necessary for verifying your identity or your Patient Representative's identity, fulfilling your orders, contacting you regarding your prescription and providing you with the Services.
- Social Media Sites. If you choose to connect to our Site and/or Services through a third-party social network such as Facebook, Facebook Messenger or WhatsApp, we may collect information from your profile on such third-party social networks, such as your name, username, photograph, gender and date of birth.
- When you or your Patient Representative make purchases through our Site and/or Services, our payment processor will collect your credit card information. We do not collect or store your credit card information. Other information, such as your insurance information, policy numbers and group plan information will be stored and processed by us or any pharmacy software provider we may partner with.
- When you or your Patient Representative Fill prescriptions through our Site and/or Services, you or your Patient Representative will provide us with your prescription information, including the medication requested, amounts and information regarding your physician or other prescribing professional. We will use this information to fill your prescription as required. This information will be stored, processed and shared with the Netcare system, if you are resident in Alberta. We may also contact your physician or the prescribing professional if additional information regarding your prescription is required. Some additional information obtained from your physician or prescribing professional may also be Personal Information,

such as your medical history or medications. We may discuss specific medications with you or your Patient Representative on SMS, email, chat, phone call or any other communication.

- Public Forums. If you choose to use any public forum, blog, comment section or chat function, we may collect any information you disclose through such means.
- In-Media Communications. If you choose to send a message to us through our message, chat, post, SMS, email or other function, we may collect any information you disclose through such means to facilitate the communication.
- Push Notifications. If you choose to enable push notifications, we may use your information, such as a device ID or email address, in order to send push notifications to your device.
- Your Location. We may collect precise geolocation information provided that, before doing so, you will either be informed of such practice or be prompted to allow or disallow such feature. If you use any of the Site, Content and/or Services or choose to allow such feature, you can disallow it at any time after that by taking the appropriate steps in the applicable settings tab.
- Information You Submit to Us. If you choose to submit your information to us for any other reason in any other form, we will collect it and use it for the purposes for which you presented it.
- Visiting our Site. We will not collect any Personal Information from you simply by your visiting our Site; we only collect Personal Information if you or your Patient Representative chooses to submit it to us. However, we collect Non-Personal Information, such as Usage Data, whenever you use our Site and/or Services. Such Non-Personal Information is not combined with Personal Information unless you choose to submit Personal Information to us.
- Where Permitted by Law. We may also collect Personal Information as otherwise permitted by law.
- Do Not Track (DNT). Do Not Track (DNT) is a privacy preference that users can set in their web browsers, allowing users to opt out of tracking by websites and online services. The World Wide Web Consortium (W3C) has not yet established universal standards for recognizable DNT signals, and, therefore, NowPills does not recognize DNT.
- "Cookies". In connection with the foregoing collection of information, we may also use "cookies" or similar technologies (small amounts of data that are stored on your computer's hard drive, mobile device or media system platform when you use or access our Site and/or Services that identify your computer, mobile device or media system platform and may store information about you such as behavioural data). Should you choose to submit Personal Information to us, we may link cookie information to such Personal Information. If you do not wish to accept cookies, you can block or disable cookies. However, please be aware that some of our Sites, Content and/or Services will not function properly if you do so, and you may lose access to the Services you purchased.

- Third Party Advertising Partners. In addition, certain advertising partners may also use cookies in connection with advertising on behalf of NowPills. Such cookies may collect Non-Personal Information, which those partners may use to serve you targeted ads within and outside our Site and/or Services.

PUBLIC INFORMATION INCLUDING USER-GENERATED CONTENT

You may disclose information about yourself while contributing User Generated Content to us or through your use of our Site and/or Services, including but not limited to our online forums, user “profiles” for public view or similar meetings on our Site. Information you disclose in any of these forums is unencrypted, general information may be accessed or recorded by NowPills, and there is no expectation of privacy or confidentiality.

You should be aware that any Personal Information you submit during these public activities can be read, collected, or used by other forum users and could be used to send you unsolicited messages. We are not responsible for the Personal Information you choose to make public in any of these forums.

Note also that in the ordinary course of Internet activity, certain information may be sent from your browser to third parties such as advertising networks and analytics companies. NowPills has no control over the information sent from your browser to those networks or other third parties and recommends that you ensure that your browser settings prevent the disclosure of information you would not like to share.

If you post a video, image or photo on our Site for public view, you should know that these may be viewed, collected, copied and/or used by other users without your knowledge or consent. We are not responsible for the videos, images or photos you submit to our Site. Please see our Terms of Use at [Terms of Use](#) on this point and other guidelines about posting content on any of our Sites.

USE OF YOUR INFORMATION

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

- to develop, enhance, market, sell or otherwise provide information, products, services and functionality that you have requested, including the Services;
- to improve our Site and/or Services and inform future Service creation.
- to send you information related to our Site /or Services, including confirmations, technical notices, updates, security alerts, information related to product safety or recall issues and support and administrative messages;
- to process transactions for the Services;
- to manage your account with NowPills.

- to attempt to contact you regarding product safety or recall issues;
- 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;
- to personalize your NowPills content and offers.
- to respond to customer service inquiries;
- to troubleshoot problems with the Site and/or Services;
- to enforce our [Terms of Use](#)
- to protect against unlawful activities or other misuse of the Site, Content and/or Services or for other security reasons.
- to conduct marketing, including promotional activities such as running marketing or advertising campaigns with third-party marketing and advertising partners to promote the Site and/or the Services.
- to provide you with advertising that better suits your interests and profile and is age/gender-appropriate and targeted to your interests, general location, or both.
- to compile statistics;
- to send you push notifications (if you choose to allow that function); and
- For any other purpose, 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, you acknowledge and agree that we may use the Personal Information for the purposes set out in this Privacy Policy and by accessing, using, or installing any of our Site, Content and/or Services or submitting information to us you also agree that we may use the Non-Personal Information for the purposes set out in this Privacy Policy.

UPDATES AND PUSH NOTIFICATIONS

We may occasionally send you updates, patches and related push notifications that may be important to you. If you do not wish to receive updates, patches and notifications, you should discontinue use of our Site, Content and/or Services or disconnect your computer or device from the Internet.

If you do not wish to receive push notifications, you can disallow this function through the settings on your mobile device.

DISCLOSURE OF INFORMATION

We will not transfer your Personal Information to third parties, except for our subsidiaries, affiliates and business partners that we engage to provide services on our behalf, such as (but not limited to) web hosting services, credit card payment processing, provincial/private health plan coverage, pharmacy software providers, order processing and delivery, provided that such third parties have agreed to comply with legally required privacy standards and agree to use the information only for the purposes disclosed at the time of collection or for a use consistent with that purpose. NowPills will only provide those third parties with the Personal Information they need to deliver the services to NowPills or on NowPills' behalf.

We will also provide Personal Information to Netcare if you are a resident in Alberta or such other prescription drug information system as required by applicable law in your relevant jurisdiction. We may also contact your physician or the prescribing professional if additional information regarding your prescription is needed and may disclose or obtain Personal Information through such contact.

We may need to disclose your Personal Information to a third-party licensed pharmacy and a prescribing physician to fill your prescription(s). We may also disclose your Personal Information to your provincial and/or private health plan as a matter of convenience for payment of your prescription purchases for your convenience.

We may also disclose your Personal Information to a third-party vendor whose products or services you have requested to deliver those products and services to you. Third parties may keep and use your Personal Information whether or not you purchase their products or services. Your Personal Information will be subject to their privacy policies, so you should contact them directly for information or to voice your concerns regarding their policies.

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 colour of law. In addition, we reserve the right to disclose Personal Information and Non-Personal Information to (a) enforce the Use [Terms of Use](#); (b) investigate and/or take action against the unlawful activity, suspected abuse or unauthorized use of the Site and Services; (c) protect and defend the rights or property of NowPills; 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 knowledge and if we do so, we will notify you that such a transaction has taken place and that your Personal Information has been disclosed.

We may also share aggregate or anonymized information, including Personal Information, about you with service providers, business partners, and other third parties, to the extent permitted by applicable law.

We may sell, rent or share your Usage Data and other Non-Personal Information, including, without limitation, device IDs, advertising IDs or other persistent identifiers and non-precise geolocation information or precise geolocation information (if you choose to allow us to collect it), with third parties who assist us with our operations such as administration, analytics, research, optimization, and with our business partners to, among other things, allow them to serve more relevant advertisements tailored to you.

PROTECTION OF YOUR INFORMATION

As applicable privacy laws require, NowPills has implemented reasonable physical and technical measures to protect the information we collect or are provided with from unauthorized access and against loss, misuse or alteration by third parties. 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 the information we collect or are provided with, contact us via email at pharmacy@nowpills.ca.

RETENTION OF YOUR INFORMATION

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

Currently, NowPills or our third-party service providers retain, and store information collected by, or provided to, us in the cloud and on secure servers in Canada. As some of our third-party service providers may retain and store information received from users (including Personal Information) outside of Canada and under the laws of those other jurisdictions, in certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other provinces or foreign jurisdictions may be entitled to access users’ information.

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 a suspected breach or misuse of your account.

ACCESS AND ACCURACY

NowPills will use commercially reasonable efforts to provide you access to your Personal Information (to the extent we have any) if you submit your request for access via pharmacy@nowpills.ca. Subject to applicable law, NowPills reserves the right to deny access to your Personal Information on any of the following grounds:

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

You are responsible for ensuring that all information created through your access to 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 your own risk. We ask that you keep the Personal Information you provide us current and correct. You represent and warrant that all Personal Information you provide us is true and correct and relates to you and not to anyone else. If you believe that the Personal Information maintained by NowPills about you is inaccurate or incomplete, you may notify us by describing in detail any inaccuracies or omissions via email at pharmacy@nowpills.ca. Following receipt of a correctly submitted notice, we will, within a reasonable period and acting in our sole discretion, use commercially reasonable efforts to either (a) amend or correct your Personal Information to reflect corrected or additional information provided by you or (b) in connection with your Personal Information, make note of any claimed inaccuracies or omissions reported in the notice submitted by you.

OUR POLICY REGARDING CHILDREN

NowPills recognizes the privacy interest of children, and our Site, Content and/or Services are not intended for children under the age of majority in your jurisdiction, and we do not target our Site, Content and/or Services to children under the age of majority. NowPills does not knowingly collect or use any Personal Information from children under the age of majority unless provided by a parent or guardian using the Site and/or Services on behalf of such minor. If a parent or guardian becomes aware that his or her child has provided us with information without their consent, please contact us at pharmacy@nowpills.ca. We will delete such information from our files within a reasonable time.

GOVERNING LAW

Those who use or access the Site and/or Services from outside Canada do so on their initiative and are responsible for compliance with local laws, if and to what 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 under the laws of the applicable province where your dispensing 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 your applicable dispensing pharmacy is located.

INTERNATIONAL TRANSFER

To the extent permitted by applicable law, we may transfer information we collect about you to third parties across international borders and from your jurisdiction to other jurisdictions around the world for storage on the servers that store and manage certain of the information and data we collect. To the extent applicable laws require, NowPills will maintain and store your personal information in Canada or within your jurisdiction and not transmit such information across international or jurisdictional borders. Please note that these countries and jurisdictions may not have the same personal information protection laws as your jurisdiction, and you consent to the transfer of information over international borders and the use and disclosure of information about you, including Personal Information, as described in this Privacy Policy.

QUESTIONS OR COMMENTS

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

NowPills Inc.

Attention:	Privacy Officer
Address:	2520 23 ST NE #18, Calgary, AB T2E 8L2
Email:	pharmacy@NowPills.ca