

Privacy Policy

Nutramax Laboratories Veterinary Sciences, Inc. (“**Nutramax**”, also referred to as “we”, “us” or like terms) respects the privacy of individuals who visit our website located at www.cosequin.ca, or other websites that post a link to this Privacy Policy (each individually a “Website”, and collectively, the “**Websites**”), who register to participate in our continuing education programs (“**CEP**”), or who otherwise interact with us both online and offline.

This Privacy Policy (“**Policy**”) outlines Nutramax’s policies regarding the collection, use and disclosure of your information, primarily in connection with your visit to and use of the Websites or registration to participate in our CEP. We may also obtain your personal information offline. Without limiting the foregoing, this Policy does not apply to information that is not collected by us or on our behalf, including on any other website operated by a third-party, or through any application or content (including advertising) that may link to or be accessible from the Websites or any third-party platform on which our CEP are hosted.

For more information about our information handling practices, please contact us as described under the “Contact Us” heading below.

Nutramax’s privacy practices are developed with regard to applicable privacy legislation. This Policy will be reviewed and may be updated periodically to reflect any changes in the way we handle the personal information of visitors to the Websites, CEP registrants, attendees and participants (collectively, “**CEP Registrants**”) or personal information obtained during other interactions with our business, and/or any changes to applicable laws.

For the purposes of this Policy, “**Personal Information**” means information about an identifiable individual, including if there is a serious possibility that an individual could be identified through the use of that information, whether alone or in combination with other information.

What Personal Information Do We Collect?

We typically collect the following Personal Information from our Websites’ visitors and consumers we interact with offline:

- your contact information, including your name, phone number, email address, and home address;
- a recording of the call with our Customer Service team (which you may decline as further described in the **Personal Information Collected via Recording of Customer Service Calls** section below);
- information regarding your purchases;
- information regarding your inquiries, or complaints or adverse events involving our products;
- your location, including your municipality, province or postal code;
- information about how you interact with the Websites, including the time you spend on the Website’s webpages, the source and terms used to request or find the Websites, the type of

Internet browser you are using, and the preceding and subsequent pages that you have viewed; and

- statistics about your interactions with the Websites, such as content response times, download errors, and other information commonly shared when browsers communicate with websites.

Although it may be possible to link the information collected from our Websites to an identifiable individual, Nutramax uses such information only in an aggregate and de-identified form, and does not seek to identify you from the information collected through its Websites.

The Websites may contain links to third-party websites, including links to purchase Nutramax's products or to participate in CEP hosted on third-party platforms. When you click these links, you will leave the Websites and your browser will be redirected to a third-party website. The collection, use, disclosure, access to and retention of your Personal Information in connection with such third-party websites is governed by the privacy policy and practices of such third-parties, as may be amended from time to time. Please note that Nutramax does not have any control over or responsibility for information collected by or through third-party websites.

What Personal Information Do We Collect From CEP Registrants?

We typically collect the name, phone number, home address (including the city, Province, ZIP/postal code and country/region), practice name, position and email address of a CEP Registrant, together with the CEP they register for, attend and/or access.

How Do We Collect Website Visitors' Information?

Nutramax utilizes third-party service providers such as analytics providers and advertising networks, as described further under the "When May We Disclose Your Personal Information?" heading below. These third-party service providers may use the following tracking technologies, including cookies, web beacons, and embedded scripts to collect information about Websites' visitors.

Web Beacons

The Websites may use "web beacons" and/or "tracking tags" to serve users with relevant content on the Websites, count Website visitors, and monitor Website traffic patterns and activity. Web beacons are small graphics or other web programming code with a unique identifier that may be invisible to you, but which are nevertheless inserted into the Websites to serve the purpose described above.

Embedded Scripts

The Websites also utilizes embedded scripts, which are code designed to collect information about your interactions with the Website, such as what pages are visited, how many times they are visited, and for how long. The code is temporarily downloaded onto your computer or other device and is deactivated or deleted when you disconnect from the Website.

Cookies

The Websites use "cookies" to help personalize your visit to and use of the Websites. A cookie is a small data file that is placed and possibly stored on your computer's hard drive, mobile phone or other device by a website server. Cookies are uniquely assigned to you, and can only be read by your computer or a web server in the domain that issued the cookie to you. We use a real-time cookie banner to alert you to the use of cookies when you first enter the Websites.

What cookies does Nutramax use?

Session Cookies

These cookies are removed when you close your browser. The main use of these cookies is to distinguish between a collective visit to the Website by a user and individual views on each page of the Website. For example, in instances where a single visitor to the Website views five pages, these cookies allow Nutramax to distinguish if one person viewed all five pages during a visit or if multiple individuals were responsible for those views.

Persistent Cookies

When you return to the Website, the information stored in this cookie can be retrieved. This allows Nutramax to identify visitors as either new or returning and in turn allows us to deliver more relevant content based on a visitor's previous activity.

Third-Party Cookies

These cookies are used by advertising networks to track your online activities over time on our Websites and on third-party websites that participate in the ad network. As a result, you may see ads on other websites based on your prior activities on our Websites.

Website visitor consent to place cookies

Through your use of the Websites, you consent to us placing cookies on your device. Most browsers automatically accept cookies. However, if you or another user of your device wish to withdraw your consent at any time, you have the ability to accept or decline cookies by modifying your browser settings. If you choose to decline cookies, you may not be able to use all features of the Websites.

How Do We Collect CEP Registrants' Information?

Nutramax utilizes third-party service providers to track registration for CEP and to host the CEP themselves (whether live or pre-recorded), as described further under the "When May We Disclose Your Personal Information?" heading below.

CEP Registrants register to attend live CEP or access pre-recorded CEP through a third-party web platform, which then communicates the CEP Registrant's information (see the "What Personal Information Do We Collect From CEP Registrants?" heading above) to Nutramax so that we can track attendance at and host our CEP.

How Do We Use Your Information?

Information collected through the Websites may be used to send personalized advertising to your computer or other devices, based on your past searches, visits to and activity on the Websites, and other data obtained through the use of “cookies” placed on your computer or device. For more information about how we use cookies, please see the heading “How Do We Collect Your Information?” above. To opt out of personalized advertising, please see the links provided below under “Service Providers”. In addition, the online advertising industry provides websites from which you may opt-out of receiving targeted ads from data partners and other advertising partners that participate in self-regulatory programs. You can access these and learn more about targeted advertising and consumer choice and privacy at <https://youradchoices.ca/choices/> and www.aboutads.info/choices/. To separately make choices for mobile apps on a mobile device, you can download DAA’s AppChoices application from your device’s app store. Alternatively, for some devices you may use your device’s platform controls in your settings to exercise choice.

We may use your information collected through the Websites to help us determine how visitors arrive at the Websites, what type of content is most popular or relevant to visitors, and what type of visitors are interested in particular kinds of content and advertising. We may also combine the information collected through the Websites with information from other sources such as internet search engines to improve marketing and determine the effectiveness of our online advertising.

Your location may be used as part of a voluntary feature on a Website that allows you to find a location near you that sells our products. If you elect to use this feature and submit your location information, your location may be temporarily stored in a session-based cookie in your browser and/or on your device. However, we do not permanently store or otherwise use location-based Personal Information of Website visitors.

Personal Information collected from CEP Registrants may be used to track your attendance at CEP, to send you an email asking you to confirm your registration, to provide you with CEP materials or log-in details, to permit you to log-in to attend or view CEP, and to assess the popularity of CEP we offer. With your consent, we may also send you electronic marketing materials about upcoming CEP or products that may be of interest to you. Your information may also be used to generate and send or make available to you a certificate evidencing your participation in and/or attendance at CEP.

We may use your personal information to generate de-identified, anonymized or aggregated data to use for our business purposes in accordance with the requirements of applicable law.

Personal Information Collected via Recording of Customer Service Calls

As mentioned earlier in this Policy, we may collect your personal information via the audio and video (limited to video of the customer service agents’ computer screen) recording of your calls with our Customer Service team. We will seek your consent prior to recording any conversation you have with our Customer Service team. If you do not wish to have your call recorded, you can indicate your preference by pressing the appropriate button on your phone when prompted or by notifying the customer service agent and the agent will disable the call recording software or provide you with an extension to call for you to continue with a non-recorded conversation.

We record Customer Service calls for quality assurance purposes, such as, to evaluate our customer service agent's performance on the call and for background information in the event we need to return a call to you, and for training purposes. With your consent, we will collect audio and video (of the customer service agents' computer screen) recordings. The video recording will allow our managers to see how the data is being entered while listening to the interaction in the call audio. Again, this is for quality assurance and training purposes.

All audio and video recordings will be stored in a call recording software (provided by Calabrio, Inc.) located on a server in the United States, for approximately six (6) months.

Consent

By accessing or using the Websites and/or by registering for, attending or participating in CEP, or otherwise interacting with our businesses, you consent to the collection, use and disclosure of your Personal Information for the purposes set out in the "How Do We Use Your Information?" section above.

We will seek your consent as required by law before collecting any additional information to that described in this Policy or using your Personal Information for any purposes beyond the scope of this original consent. You may withdraw your consent at any time, subject to legal and contractual restrictions. Please note, however, that withdrawing consent may affect your ability to use all features of the Websites and/or to register for, attend or participate in CEP.

When May We Disclose Your Personal Information?

In connection with one or more of the purposes outlined in the "How Do We Use Your Information?" section above, and subject to applicable laws and legislation, Nutramax may share your Personal Information with another person or entity in the following circumstances:

Affiliates

We may share your Personal Information with our parent company, Nutramax Laboratories, Inc., which is located in the United States and will only use your Personal Information for the same purposes as we do.

Our Employees

Your Personal Information will be accessible to employees of Nutramax and Nutramax Laboratories, Inc., who have a need to know such information, which would generally include employees in our marketing, information technology, legal, technical veterinary or other departments that may from time to time require access to such information.

Service Providers

There are certain third-parties that provide services to Nutramax. Currently, the service providers that may have access to or be in possession of the Personal Information about Website visitors or CEP Registrants are as follows:

Google Inc. (Google Analytics, Google Tag Manager, GA Audiences, and DoubleClick)	The Google services help us better understand how users engage with our Websites so we can enhance the user's experience. The services allow us to analyze data pertaining to our Website traffic and track error and performance incidents, enable us to adapt ads to users and improve campaign effectiveness, and to throttle requests made to Google's maps API. To learn more about how Google collects, processes and stores your data, visit Google's privacy policy at http://www.google.com/intl/en/policies/privacy/ . To opt out of personal advertising delivered by these Google services, please visit: https://www.google.com/ads/preferences/
Cisco WebEx LLC (WebEx)	CEP Registrants register with WebEx's platform so that they can attend CEP presentations to obtain continuing education credits. To learn more about how WebEx collects, processes and stores your data, visit WebEx's privacy policy at https://www.cisco.com/c/en/us/about/legal/privacy-full.html .
Thinkific Inc.	CEP Registrants register with Thinkific's platform so that they can access CEP content hosted thereon to obtain continuing education credits. To learn more about how Thinkific collects, processes and stores your data, visit Thinkific's privacy policy at https://www.thinkific.com/privacy-policy/ .

As our business grows and Nutramax's services continue to develop, we may choose to use other service providers in Canada, the United States or elsewhere and will update this Policy periodically to reflect the use of additional service providers.

Legal Requirements

There are circumstances where we may collect, use or disclose your Personal Information without notice or consent when permitted or required by law or lawful authority. For example, from time to time, we may be compelled by legal action to release Personal Information, including, for example, in the case of a statutory reporting obligation or court order.

In certain circumstances, we may also be permitted by law to disclose Personal Information without the consent of the Website visitor concerned. For example, we may disclose Personal Information without consent in certain emergency circumstances.

International Transfer of Personal Information

The global nature of our business sometimes requires us to use services providers who may be located in the United States or elsewhere outside of Canada.

Accordingly, your Personal Information may be transferred outside of Canada to a country that does not have the same data protection laws as Canada. Such Personal Information will be subject to the legal requirements of the applicable foreign jurisdiction(s) and may be accessible to courts, law enforcement and national security authorities in each jurisdiction where it is accessed or stored.

Security of Personal Information

We have implemented organizational, physical and technological safeguards to protect Personal Information from loss and unauthorized access or disclosure, including but not limited to the use of security software, passwords and firewalls to prevent unauthorized computer access. Our employees receive training with respect to secure and confidential handling of Personal Information.

Please note that no method of transmitting or storing Personal Information online is completely secure. As a result, while we strive to protect your Personal Information, you should be aware that:

- there are security and privacy limitations of the Internet which are beyond our control;
- the security, integrity and privacy of any and all information and data exchanged between you and us through the Websites or a third-party web platform cannot be guaranteed; and
- any such information and data may be viewed or tampered with in transit by a third-party.

We endeavor to protect Personal Information, but we cannot guarantee the security of information transmitted to us, or by us, by electronic means.

Storage and Destruction of Your Personal Information

Your Personal Information is stored at Nutramax's offices, principally located at 946 Quality Dr, Lancaster, SC 29720 USA, and may also be stored at the offices and/or data centres of our third-party service providers.

When your Personal Information is no longer needed by us for the purposes described in this Policy, or otherwise for legally permissible reasons, we will securely dispose of your Personal Information.

Accessing Your Personal Information

You may ask for access to the Personal Information that we hold about you, as well as for information about our handling of your Personal Information. Your request for access must be in writing, and should be sent to General Counsel, Legal Department, at the contact information below.

Access will generally be provided free of charge; however, if you request that information be copied or transmitted to you, we may charge a reasonable fee where permitted by applicable law.

In certain circumstances, we may decline or be unable to provide access to some or all of the Personal Information that we hold about you where permitted or required by applicable law. If we do not provide you with access, we will generally provide you with an explanation as to why.

Questions, Concerns and Updates to Your Personal Information

You may contact us at any time to access your Personal Information, or with any questions or concerns with respect to your Personal Information, including for reasons such as:

- accessing, correcting or updating your Personal Information;

- asking questions or expressing concerns about this Policy or any other matter related to Nutramax's collection, use, protection, retention or disclosure of your Personal Information;
- to obtain written information about our policies and practices with respect to service providers (including affiliates) outside Canada, or to ask questions about the collection, use, disclosure or storage of personal information by our service providers outside Canada; or
- to withdraw consent to Nutramax's continued use or disclosure of your Personal Information.

Please direct all such requests to our General Counsel, Legal Department at 946 Quality Drive, Lancaster, SC 29720 or atlegal@nutramaxlabs.com.

This Policy was last updated on: February 12, 2021.