

Medicare Pharma – Privacy Policy

Last Updated: July 19, 2021

This Privacy Policy is intended to help you understand what personal information we may collect about you when you interact with Medicare and its subsidiary companies (“Medicare,” “we”, “us” and “our”) websites. This Privacy Policy does not apply to any other information collected by Medicare through any other means, except as is specifically described below in the California Residents Section. Please note that our website may contain links to third party websites or services that are not owned or controlled by Medicare. Medicare is not responsible for how these properties operate or treat your personal data. We recommend that you read the privacy policies and terms associated with these third-party properties carefully.

California Residents: For information relating to California residents, please see the California Residents Section below.

Medicare’s Privacy Policy is organized in the following sections:

- Personal Information We May Collect About You
- How We Use Your Personal Information
- How We May Share Your Personal Information
- California Residents
- Cookies and Other Tools
- Security
- Choices Regarding Personal Information
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Personal Information We May Collect About You

We collect personal data that you choose to provide. For example, through our “contact us” page, you may choose to provide your name, email, city, state and/ or phone number. If you are a Health Care Provider you may also choose to provide your specialty, and/or place of work.

In addition, we may gather information about you automatically through your use of our website(s). For example, we may collect your IP address when you visit our website and track how you navigate the website. Please refer to the section below for more information on [Cookies and Other Tools](#) that our website uses.

Occasionally, we may combine your personal data we have about you with additional information obtained from other sources such as data collected from public databases or other third parties. For example, we may use such third-party information to verify licensure of healthcare professionals.

There may be instances where one wishes to submit personal data relating to another individual. By submitting personal data relating to another individual, you represent that you have the authority to do so and permit us to use the information in accordance with this Privacy Policy.

How We Use Your Personal Information

We may use your personal data in the following ways:

To Serve You

We may collect your personal information to better serve you. For example, we may use your personal information to provide you with information and services including newsletters, press releases, financial results, invitations, job postings, and other information about products, brands, health topics and disease states.

To Improve Our Marketing Programs and Campaigns

Your Personal Information may be used to tailor our marketing programs and campaigns. We use your data to monitor and analyze usage, activities, and trends of our products and services in order to better understand which digital platforms and services are of more interest to you and to improve the content on these platforms.

To Connect You with Third Parties

We may offer access to third party sharing functionality, such as third-party social media widgets/tools/buttons. If you use that functionality, your use is subject to the third-party's privacy policy and terms. As with all links to non-Medicure websites/content/services, we recommend that you read the privacy policies and terms associated with third party properties carefully.

To Validate Your Ability to Use/Access Certain Products or Services

Some of our products and services are only suitable for certain individuals which meet a specific eligibility criteria. In such circumstances, we may verify that you meet these criteria. For example, certain information on our websites is intended for licensed healthcare professionals, and as such, we may use collect such information to validate your licensure to view such information.

To Improve Products and Services

The information that you provide will be used to perform data analysis to better understand our customers and their needs, to respond to customer questions and keep track of the types of questions we are being asked, and to further develop and improve our products and services.

To Protect Patients and Consumers

We use the information you provide to comply with our regulatory monitoring and reporting obligations including those related to adverse events, product complaints and patient safety.

How We May Share Your Personal Information

Medicare may share your personal data with members of Medicare and its subsidiary companies for the purposes set forth in this Privacy Policy.

Within Our Family of Companies

Medicare Inc. may share your personal data amongst and between other Medicare subsidiaries for the purposes set forth in this Privacy Policy.

In Connection with Business Transfers

Should Medicare sell or transfer a business unit (such as a subsidiary) or an asset (such as a website) to another company (including in connection with any bankruptcy or similar proceedings), your personal data will be shared with such company. In this instance, we will require such company to use and protect your personal data consistent with this Privacy Policy.

With Providers

Other companies (providers) may provide us with products and services which may require that they access personal data to perform their functions. These companies may not use such data other than on our behalf or subject to contracts that protect the confidentiality of the data. Examples of providers include, email and SMS vendors, customer service and support providers, data analytics firms, web hosting and development companies and fulfillment companies and companies with which we co-promote products.

To Comply with Law

We reserve the right to disclose your personal data as required by law, when we believe disclosure is necessary or appropriate to comply with a regulatory requirement, judicial proceeding, court order, government request, or legal process served on us, or to protect the safety, rights, or property of our customers, the public, Medicare or others.

In Aggregated/De-identified Form

We may aggregate and/or de-identify data about visitors to our website and use it for any purpose. This could include sharing this data with third parties.

California Residents:

The following details are provided pursuant to the California Consumer Privacy Act of 2018 to describe the categories of personal information about California residents that we have collected or disclosed in the preceding 12 months.

Categories of personal information collected:

- A. Identifiers, such as name and numerical identifiers (for example physician's license numbers)
- B. Personal information, as defined in the California safeguards law, such as contact and financial information
- C. Characteristics of protected classifications under California or federal law, such as age, gender, medical conditions, and marital status

- D. Commercial information, such as transaction information and purchase history
- E. Internet or network activity information, such as browsing history and interactions with our websites
- F. Geolocation data, such as device location or location of a specific individual;
- G. Audio, electronic, visual and similar information, such as call and video recordings;
- H. Professional or employment-related information, such as work history and prior employer;
- I. Education information subject to the federal Family Educational Rights and Privacy Act, such as student records and directory information; and
- J. Inferences drawn from any of the Personal Information listed above to create a profile or summary about, for example, an individual's preferences and characteristics.

Personal information disclosure for business purposes:

Any of the above categories of personal information may have been disclosed for operational business purposes such as to provide you with our products and services, to verify your identity to allow your participation in one of our programs or to comply with legal and regulatory requirements including the reporting of adverse events.

Sale of personal information of California residents:

We have not and do not sell the personal information of California Residents.

Sources of personal information:

The sections on *personal information that we may collect about you* and *cookies and other tools* describe the sources of information that we may have collect from California residents.

Purpose of collecting personal information:

The section *how we use your personal information* describes the purpose of collecting the personal information of California residents.

Although some exceptions apply the California Consumer Privacy Act gives California residents the right to request any of the following:

1. You may request that we delete the personal data that we have collected about you.
2. You may request that we send you a copy of specific pieces of personal data that we have collected over the previous 12 months and deliver this information to you via mail or electronically in a portable and, to the extent technically feasible, readily useable format that allows you to transmit this information to another entity without hindrance.
3. You may request information on how we have handled your personal information in the previous 12 months. This information may include:
 - The categories of personal data that we have collected
 - The purpose for collecting your personal data
 - The categories of third parties to whom we have disclosed or shared your personal data.
 - The categories of sources of personal data that we have collected

- The categories of personal data that we have disclosed or shared with a third party for a business purpose.

Medicure will not discriminate against any California resident who exercises these rights. Please note that your request does not ensure complete or comprehensive removal of the content or data, as, for example, some of your data may have been reposted by another user.

You may submit requests consistent with this section by emailing compliance@medicure.com, or by calling 1-800-509-0544.

These requests can be made up to twice in a 12-month period.

Cookies and Other Tools

Medicure uses cookies and another tools (as described below) with the goal of providing advertising to individuals who may be interested in our products and services. Generally, we partner with companies who specialize in online advertising in order to do this.

What Are Cookies?

A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website that uses cookies, the corresponding web server asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Each website can send its own cookie to your browser if your browser's preferences allow it, but (to protect your privacy) your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other sites. You can disable cookies by changing your browser settings, but this may disable certain functionality on websites that use cookies.

What Are Web Beacons, Clear Gifs, and Pixels?

These are three names for the same technology: a small or invisible image or other loadable element that can work independently or in connection with cookies to record certain technical or behavioral information regarding whether certain content has been delivered and accessed or viewed.

Why Do We Use Cookies and Other Tools?

Cookies help us to make our website more efficient and relevant to you. We use cookies and other tools to track website traffic and visitor behavior. We've embedded tracking scripts into our website code which enables us to see how many people visit our sites on a daily basis, which pages are highly trafficked and which pages are being clicked on the most. These tools also allow us to view where our visitors are coming from – however, this is only specific to state and city. We do not receive any data that is related to location more specific than state and city. We use this data to help us to create information that is of interest to our website visitors.

We may utilize cookies and other tools in our email campaigns. Tracking scripts are enabled in some email campaigns to allow us to see which emails recipients are interacting with and specifically which buttons and links are being click through by recipients.

We may also use tools for cross-device engagement. If you use various devices to access our websites or services, our cookies and other technologies may use automated analysis to try and match your anonymous profile across your various devices. This enables us to better serve advertisements that may be of interest to you, and may also help us prevent you from seeing the same advertisements on various devices.

Our partners may use technical and behavioral information gathered from our cookies and other technologies on our website to automatically build anonymous behavioral profiles. They may also use technical and behavioral information received from third party sources to help us build these profiles. These profiles do not identify you personally, but allow us to deliver advertisements that are more likely to be interesting or relevant to you (interest-based advertisements).

Disabling cookies on your device or browser may limit or prevent building of behavioral profiles from your activities in the device or browser. To fully opt-out of our building of behavioral profiles, please contact us at compliance@medicare.com.

Do Not Track

Our services and sites currently do not recognize “do not track” signals that may be sent by certain browsers.

Security

Your information is protected from unauthorized access by technical, administrative and procedural measures. We do our best to ensure the security of your data however we cannot guarantee that our methods will prevent theft, loss or unauthorized access or use of your data. It is the responsibility of the user to ensure the secrecy of any passwords used to access Medicare accounts. If you have concerns about the security of your data or any accounts Medicare accounts please contact us at compliance@medicare.com

Choices Regarding Personal Information

Disclosing your personal information to us is voluntary. You may always choose not to share personal information however we may not be able to offer certain products and services to you if that transaction requires disclosure of information that you do not wish to share.

If you have shared personal information with us and you would like to withdraw it we will respect that choice in accordance with legal obligations.

Your Rights

If you would like to request to review, delete or correct personal data that you have provided to us please see the Contact Us section to find information on how to submit your request. We will respond to your request in accordance with applicable laws.

Please note that we will retain certain information if require to do so in order to meet applicable regulatory or legal obligations.

Retention Period

We will retain your personal data for as long as needed or permitted in light of the purpose(s) for which it was obtained and as outlined in this Privacy Policy. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you and provide the Site to you; (ii) whether there is a legal obligation to which we are subject; or (iii) whether retention is advisable in light of our legal position (such as in regard to the enforcement of the Site Terms of Use, applicable statutes of limitations, litigation or regulatory investigations).

Cross Border Transfers

The Site is controlled and operated by us for consumers in the United States and is not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States. Any information you provide to Medicare through use of the Site may be stored and processed, transferred between and accessed from the United States and other countries which may not guarantee the same level of protection of personal data as the one in which you reside. However, Medicare will handle your personal data in accordance with this Privacy Policy regardless of where your personal data is stored/accessed.

Children's Privacy

This site is not directed to individuals under the age of 13, and we do not knowingly collect personal data from children under the age of 13.

Contact Us

The company responsible for collection, use and disclosure of your personal data under this Privacy Policy is Medicare, Inc.

If you would like to exercise any individual rights, please contact us by emailing compliance@medicare.com or by contacting us at 1-800-509-0544. We will respond to your request consistent with applicable law.

If you have questions about this Privacy Policy, please contact us by emailing the Compliance Officer (compliance@medicure.com), or write to the following address:

Medicure Inc.
Compliance Officer
2-1250 Waverley Street
Winnipeg, Manitoba
Canada R3T 6C6

U.S Contact Information
Medicure Pharma, Inc.
116 Village Blvd, #200
Princeton, NJ, 08540

Updates to Our Privacy Policy

This privacy policy may be updated periodically. This policy was last undated as of the effective date listed above. If the policy changes in a way that significantly affect how we handle personal data, the data that we previously gathered will be handled in accordance with the privacy policy which was in effect at the time of collection unless you are notified and or provide consent. Minor changes may occur that will not significantly affect our use of personal data without notice or consent. Please periodically review this page for the latest information on our privacy policies.