

## **Roulston's Pharmacy ReadyRx Services**

# **Privacy Commitment**

**Our Roulston's Pharmacy ReadyRx Services can help you with all of your pharmacy needs, from filling existing prescriptions to offering prescription counselling. In addition, the Roulston's Pharmacy ReadyRx app is a solution to help you manage your prescriptions, share your Patient Record with family members or any trusted individual, and access your Patient Record. At Roulston's, we are passionate about the protection of your Personal Information and Personal Health Information, and are committed to respecting your privacy.**

## **[Roulston's ReadyRx Services policy to protect your privacy](#)**

**Here's the summary:**

**By accessing or using the Roulston's ReadyRx Services, you understand that your information will be treated in accordance with this Roulston's Discount Drugs Ltd. Privacy Commitment ("Privacy Commitment"). Our Privacy Commitment and practices are consistent with the 10 Fair Information Principles and we strive to apply the principles of Privacy by Design in the development and review of our products and services.**

**If you do not want us to collect, use or disclose your Personal Information or Personal Health Information in the ways identified in this Privacy Commitment, you may choose not to use Roulston's ReadyRx Services.**

**Here's the detail:**

We have developed this Roulston's ReadyRx Privacy Commitment to provide you with specific details about how Roulston's ReadyRx collects, uses, discloses and stores your Personal Information, which includes your Personal Health Information, when you use the Roulston's ReadyRx mobile app, visit our website available at [www.roulston.com](http://www.roulston.com),

or otherwise interact with us. For additional clarity about how we handle your data and respect your privacy, please see our Frequently Asked Questions (“FAQs”).

The Privacy Commitment reflects the requirements of applicable Canadian privacy legislation, including provincial and federal privacy laws, and our own continuing commitment to privacy.

Please read this Privacy Commitment carefully. By accessing or using Roulston’s Pharmacy ReadyRx Services, you consent to the collection, use, disclosure and storage of Personal Information in accordance with this Privacy Commitment.

## Definitions

The following definitions apply to this Commitment.

**You** - An individual who uses, or registers to use, Roulston’s ReadyRx.

**Patient Record** - A record of your Personal Health Information. This may include but is not limited to:

1. the name(s) of your pharmacist(s) at each visit;
2. patient identification (i.e., name, address, phone number, personal health number, contact person in case of emergencies) and a medical history;
3. pharmacy services you receive through Roulston's Discount Drugs Ltd, such as records of treatment, profile of drugs provided (including dose, quantity, cost, coverage and prescribing physician), new prescriptions and prescription refills;
4. allergies and medical conditions; and
5. a record of appointments that you may have booked with a pharmacist, including missed and/or cancelled appointments.



**Personal Health Information** - Any Personal Information regulated under applicable health privacy legislation in the provinces and territories in which we operate, including information that relates to an individual's physical or mental health and healthcare including health history, the provision of healthcare to the individual, payments or eligibility for healthcare, healthcare provider, substitute decision-maker, health card number or other healthcare-related personal identification numbers, or any other information that is collected in the course of providing health services to the individual, including information contained in your Patient Record.

**Personal Information** - Any information about an identifiable individual, other than business contact information used to contact the individual in their business or professional capacity. Personal Information includes information you provide to create your Roulston's ReadyRx account and Personal Health Information (including your Patient Record).

Personal Information does not include de-identified or aggregated information that cannot reasonably be associated with a specific individual.

**Services** - The Roulston's ReadyRx app, our website available at [www.roulstons.com](http://www.roulstons.com), our physical pharmacies, and all services available through each, including pharmacy consultations, initial prescription counselling, patient linking, and prescription first-fills and refills.

**Roulston's ReadyRx Pharmacy Services** - In this Roulston's ReadyRx Services Privacy Commitment, the words "we", "us", "our" or "Roulston's" refer to Roulston's ReadyRx Services and Roulston's Discount Drugs Ltd.

## Accountability

**Roulston's ReadyRx Services has overall responsibility for protecting the privacy of your Patient Records and other Personal Information and we are directly accountable to you.**

## Consent

**Here's the summary:**

**When you access or use Roulston's ReadyRx Services, you consent to our collection, use, disclosure, and storage of your Personal Information as described in this Privacy Commitment.**

**You can withdraw your consent at any time, subject to limited restrictions.**

**Here's the detail:**

When you use Roulston's ReadyRx Services, you consent to our collection, use, disclosure, and storage of your Personal Information in accordance with this Privacy Commitment.

You can withdraw your consent to the collection, use and disclosure of your Personal Information, subject to our legal or contractual restrictions. However, if you refuse to provide certain information or withdraw your consent, this may limit our ability to provide you with certain services, products and functionalities.

If you want to delete your account, we may retain certain information to meet our legal or regulatory obligations. For example, it is a legal and regulatory requirement for all pharmacies in Canada to retain Personal Information that forms part of your Patient Record for a period of time set out in applicable laws and regulations. Please review the 'Retention' section below for more information on our retention practices.



To collect, use or disclose Personal Information outside of the purposes contemplated in this Privacy Commitment, we will seek additional consent from you.

Individuals under the age of 16 may not create an account on Roulston's ReadyRx Services, but a parent or legal guardian may create a user profile for an individual under the age of 16 on the parent's or legal guardian's own account (which pharmacy will use to create a Patient Record for the individual).

## Collection and Use of Personal Information

**Here's the summary:**

**We collect only the Personal Information required for us to establish and maintain a responsible healthcare and service relationship with you, to provide our Services, and to develop, enhance or market our products and services (including to send you relevant information about products and services that may be of interest to you), and to maintain and improve the security and functionality of our Services.**

**We collect Personal Information to set up an account for you on the Roulston's ReadyRx app and create a Patient Record for you so that you can access and use the Roulston's ReadyRx health-related Services.**

**We also collect other information from you as you use our Services:**

- **App usage information**
- **Website and device information**
- **Cookies**
- **Payment card information, private insurance information or healthcare number (depending on your method of payment)**



**If you consent, we may use Personal Information to send you relevant marketing communications. You can opt out of receiving them at any time.**

### **Here's the detail:**

By creating an account with Roulston's ReadyRx Services, you will have access to consultations with pharmacists by phone or video, and related healthcare services (i.e., prescription services), as well as other tools to help you manage your healthcare through the app.

We only collect and use Personal Information for the following purposes:

#### **To establish and maintain our relationship with you**

**Roulston's ReadyRx Services Account Creation:** In order to use Roulston's ReadyRx Services, you will need to download the Roulston's ReadyRx Services app and create an account by providing your first and last name, email address, date of birth and a password that you select.

After you create an account and before using any pharmacy Services, you will need to complete your profile in the app which the pharmacy will use to create your Patient Record. After you create an account and before using any pharmacy Services, you will need to complete your profile in the app which the pharmacy will use to create your Patient Record. You will need to provide your phone number, gender, address, and any health conditions or allergies. You can also provide your insurance and health card information if applicable. Once you have a Patient Record, you will have access to all of our Services, which may include pharmacy consultations, initial prescription counseling, and prescription first-fills and refills. Any changes to this information is validated by a pharmacist before it is made to your Patient Record.

**Identity Verification:** In order to use pharmacy Services, a pharmacist will use reasonable measures to verify your identity based on the information in your profile. For



example, we may set up a virtual consultation with you to validate your identity by asking you to present your government-issued identification (either, passport, driver's license, or other government-issued photo identification card).

### **To provide health-related and well-being services to you**

**Pharmacy Consultations, Prescriptions, and Other Services on the App:** You will need to provide information about your current health condition and health history to our pharmacists in order to help them better understand and manage your prescription medications. For example, if you need prescription counseling for a new prescription, our pharmacists may collect additional information from you during a confidential consultation.

For prescription-related services, such as filling a prescription, we will need a copy of your prescription from your physician (sent to us by mail or directly by your physician). We also need your address and other contact information to be able to deliver prescriptions to you.

If you wish to have some or all of your medications at Roulston's ReadyRx, you can initiate the transfer of your medications from within the Roulston's ReadyRx app.

**Real-Time Video and Audio Conversations:** When you wish to have a virtual consultation with a pharmacist, we connect you through a real-time video or phone call. During the consultation, our pharmacists may collect additional information about you to help better understand and manage your prescription medications. Our video calls also include a text-based chat feature. If you use the text-based chat, we may store a copy of the chat and any relevant attachments you may share in your Patient Record. All video and phone calls conducted through the Roulston's ReadyRx app are confidential and end-to-end encrypted. We never make recordings of the video or phone call consultations.



**Payments:** We collect your payment card information, provincial health card number or private insurance information in order to process your payment for prescriptions. To process a payment for your prescription, our third-party service provider will collect your payment information such as your name, address, phone number, email address, billing address, payment method, payment card number, and CVV number to facilitate secure payment processing. Your provincial health card number or private insurance information is not shared with our third-party. Our third-party service provider is Payment Card Industry Data Security Standard (PCI DSS) compliant. You will have the option to save your payment information on file for future payments and can delete it at any time.

**Security Video Surveillance System (cameras):** Our physical pharmacy locations are equipped with security video surveillance systems (cameras) to monitor the activities around our pharmacy facility for the safety of people (both our employees and visitors) and for the protection of our facility. If you visit our physical location, you may be captured on these cameras. For more information on sharing with law enforcement, please review the section on sharing for “Disclosures required or permitted by law or regulation”.

**Service Messages:** We may contact you by email, text message (only if you opt-in), or push notification (only if you opt-in) to provide you with helpful information related to our services such as an alert that you have an upcoming appointment or a refill or renewal reminder. You can turn off push, email, or text notifications at any time within the notification settings page of the app.

**Technical Support:** In certain circumstances, Personal Information may be required by or accessible to technical support staff in order to resolve technical issues. Where possible, our support team will resolve issues without viewing Personal Information.

**To develop, enhance or market our products and services**





**Developing and enhancing our services:** We analyze actions you take on the Roulston's ReadyRx app to better understand what services to provide or enhance. This information is not identifiable. For example, if you select a specific service on our platform, a user event is captured under a unique randomly generated identifier that cannot be linked back to you. This helps us determine successful implementations of features and guides us towards improvements. We do not use information from your Patient Record for this purpose.

**Sending marketing communications:** Your Roulston's ReadyRx contact details, including your name and email address, may be used so that Roulston's ReadyRx can provide you with health-related news and offers. These communications may be tailored based on data in your account profile and app activity, but not information contained in your Medical Record.

You can opt out of receiving marketing messages from us at any time by following the unsubscribe instructions included in each of our marketing messages or by contacting us at [wcpharmacy@roulston.com](mailto:wcpharmacy@roulston.com).

### **To maintain the security, performance, and functionality of the Roulston's ReadyRx Website and App**

**Visiting the Roulston's ReadyRx Website:** In general, you can visit our website without telling us who you are or submitting any Personal Information. However, we collect the IP (Internet protocol) addresses of all visitors to our website and other related information such as device type, page requests, browser type, operating system and average time spent on our website. We use this information to help us understand our website activity and to monitor and improve our website. We also use your Internet protocol address (IP address) and device type to help ensure a secure experience and detect anomalous behaviour.

**Device Information:** As with many applications, certain limited technical data is required for the Roulston's ReadyRx app to function on your device. The information we



collect includes information about your device and operating system, such as the type of device hardware and operating system, unique device identifier, IP address, language settings, and the date and time the app accesses our servers. This information is used to deliver content appropriate for your device's capabilities, to deliver push notifications and to help ensure a secure experience and detect anomalous behaviour in order to protect Personal Information from unauthorized access. In addition, in the event the Roulston's ReadyRx app crashes on your mobile device, we may receive information about your mobile device model software version and device carrier, which allows us to identify and fix bugs and otherwise improve the performance of the Roulston's ReadyRx app.

**App Usage Information:** We may collect and analyze information about the actions you take on the Roulston's ReadyRx app to better understand what care programs or services to provide. For example, time of use and amount of time spent on the app.

**Cookies:** We use cookies to remember your preferences and to authenticate you. You may set your browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept first-party cookies used for the purpose of authentication, you will not be able to login to the Roulston's ReadyRx Pharmacy Services platform. **Please see our FAQs and Cookies Notice for information on our use of Cookies.**

### **De-Identification and Aggregation**

**De-Identifying and Aggregating Information:** We may de-identify or aggregate your Personal Information, including information in your Patient Record, such that it cannot reasonably be associated with you, for the following purposes:

1. To protect your privacy and the security of your Personal Information;
2. To conduct analytics and/or research in a privacy protective manner to:



We may use such aggregated de-identified information or insights to assist in research, planning, or product and service development.

## Sharing and Disclosure of Personal Information

**Here's the summary:**

**For continuity of care purposes, we may share Personal Information with your family physician and others who assist in the provision of healthcare to you.**

**We will not disclose your Personal Information for any purpose other than what has been outlined in this Privacy Commitment or as permitted under applicable law, unless we obtain your express consent. We disclose only the limited amount of Personal Information necessary to meet these purposes.**

**We do not sell your Personal Information to any third parties.**

**We may share your Personal Information with our service providers who are contracted to perform services or functions on our behalf where they require the information to assist us in serving you. We use contractual controls to protect this information and limit its use to what is necessary for the service provider to perform the service.**

**Here's the detail:**

We may share or disclose Personal Information for the following purposes:

**Provision of Healthcare:** If you receive healthcare through our Services, we may disclose your Personal Information to third parties. For example, if you start the transfer of your existing prescriptions, from another pharmacy to us, we will share your information with the other pharmacy to have the prescriptions transferred. Information



will only be shared with your consent (unless we are required to do so under applicable laws).

**Patient Linking:** You may share your information with another individual if you enable the patient linking feature within the app. The other individual must create a Roulston's ReadyRx account and the data is only shared from within the app between accounts. You control and are responsible for who can view and manage your prescriptions through the patient linking feature and can automatically revoke access for someone at any time.

When you share a profile within your account, you will be sharing all current and past prescriptions you can see in the prescriptions section of the Roulston's ReadyRx app. This includes all prescriptions filled by Roulston's Discount Drugs Ltd. Some of these prescriptions may be from a third party virtual care provider.

**Service Providers:** We may share Personal Information with the Roulston's Discount Drugs Ltd, our suppliers, agents or other organizations or individuals who are contracted to perform services or functions on our behalf, where they require the information to assist us in serving you. For example, we may use service providers to process payments, host our website, store and dispose of information on our behalf, and ship medications to you.

We strive to minimize the amount of Personal Information that we share with our service providers and partners and require that it not be used for any other purpose.

**Third Party Benefits Provider/Provincial Drug Plan:** We will disclose personal health information to your third party insurance provider for copayment of any medication or related goods or services that we provide to you, and we may also share information with your provincial drug plan to process your payment.



**Disclosures required or permitted by law or regulation:** We may disclose Personal Information to the extent necessary where we are required or permitted under applicable law, such as in the event of an emergency that threatens the life, health or security of an individual. We or our service providers will also share Personal Information with law enforcement, courts, other government agencies or other parties if we are required to do so to meet our legal and regulatory requirements in the jurisdictions in which we or our service providers operate; for example, we are required to provide records to law enforcement in response to a valid court order.

**Third Party Links:** Roulston's ReadyRx may contain links to other websites or platforms that Roulston's Discount Drugs Ltd does not own or operate. Also, links to Roulston's ReadyRx may be featured on third party websites or platforms as advertisements. Except as provided in this Privacy Commitment, we will not provide Information to these third parties without consent. We provide links to third party websites or platforms as a convenience to our users. These links are not intended as an endorsement of, or referral to, the linked websites or platforms. The linked websites or platforms have separate and independent privacy policies, notices and terms of use. We do not have any control over such websites or platforms, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites or platforms may collect, use, disclose, secure and otherwise handle Personal Information.

## Access, Corrections, and Accuracy of your Personal Information

**Here's the summary:**

**You can request access to or correction of your Personal Information by contacting us at [wcpharmacy@roulston.com](mailto:wcpharmacy@roulston.com)**

**We rely on you to keep your Personal Information up to date and accurate so that we can serve you.**

## **Here's the detail:**

You may request access and corrections to the Personal Information we hold about you at any time, subject to limited exceptions. Upon written request, we will also provide you with a list of individuals or entities (e.g. third party service providers) with whom we have shared or disclosed your Personal Information, if applicable. Please contact us directly on the Roulston's ReadyRx platform or by email at [wcpharmacy@roulston.com](mailto:wcpharmacy@roulston.com) for additional information.

We rely on you to ensure that the Personal Information on the Roulston's ReadyRx platform is accurate, complete and up-to-date. You are welcome to make changes or request deletions or corrections to Personal Information on Roulston's ReadyRx at any time by updating your account profile on the Roulston's ReadyRx app or by contacting us at [wcpharmacy@roulston.com](mailto:wcpharmacy@roulston.com).

For a copy of your Personal Information, please contact us on the Roulston's ReadyRx platform or by sending us an email at [wcpharmacy@roulston.com](mailto:wcpharmacy@roulston.com). We will take reasonable steps to verify your identity before granting access or making corrections. In addition, your right to access or correct your Personal Information is subject to certain legal restrictions.

## **Storage and Location of your Personal Information**

### **Here's the summary:**

**Your Personal Information, including your Patient Record, is stored in Canada and cannot be accessed from outside Canada, with only a few limited exceptions.**

### **Here's the detail:**

Your Patient Record is encrypted in transit and at rest, and stored on a third party cloud platform with data centers physically located in Canada. As with most cloud platforms, in order to ensure availability, redundancy, and reliability, third parties operating these

cloud platforms may temporarily view, access, use, or transfer information stored in these data centers outside of Canada as necessary for installing, implementing, maintaining, repairing, troubleshooting, or upgrading their cloud platform. To ensure this information is safeguarded at all times, we make sure that any information stored on these data centers are always encrypted in transit and at rest.

We also use service providers who may access or store Personal Information, excluding your Patient Record, in the United States or other jurisdictions. For example, to send notifications to you that your prescription has been shipped, we use a third party service provider solution to manage these notifications. The notification will not contain any information about your actual prescription or what that prescription is.

## Retention

**Here's the summary:**

**We retain Personal Information only for as long as necessary to fulfil the purposes described in this Privacy Commitment or as required to meet legal or regulatory requirements.**

**Personal Information that forms part of your Patient Record must be retained for a period of time mandated by law.**

**Here's the detail:**

We retain Personal Information only for as long as necessary to fulfil the purposes described in this Privacy Commitment or as required to meet legal or regulatory requirements. We may also create and retain de-identified information, and continue to use this information in accordance with this Privacy Commitment.

At your request, we will delete your Personal Information unless we are required to retain it to meet our legal or regulatory obligations.

Patient Records must be retained in accordance with provincial retention guidelines. In general, for Patient Records, we will follow a retention of 10 years from either the date of last entry or from the age of 19 (nineteen) of the individual to whom the information relates, whichever is later.

## Safeguards

**Here's the summary:**

**We have implemented a comprehensive information security program**

**Here's the detail:**

We understand that data security is a critical priority and we are committed to safeguarding the Personal Information in our custody and control. We have implemented a comprehensive information security program that includes written policies and procedures, and security controls, as well as reasonable administrative, technical and physical safeguards in an effort to protect against unauthorized access, use, loss, modification, and disclosure of Personal Information in our custody or control.

Our team members must complete privacy and security training before they have access to any Personal Information, and must complete annual privacy and security training for ongoing access to Personal Information.

Roulston's Discount Drugs Ltd ensures that the security policies, procedures, and controls meet industry and Roulston's Discount Drugs Ltd best practices and are regularly tested.

Please keep in mind that no internet or email transmission is ever fully secure or error free and no security system is impenetrable. We cannot fully guarantee the confidentiality of any information that you provide to us but we can assure you that we will use reasonable and appropriate security controls, reflective of the sensitive nature of Personal Health Information.





It is important for you to play an active role in the protection and safeguarding of your Personal Information. It's important to guard your privacy when you are online. If Roulston's ReadyRx contains links to other websites, this Privacy Commitment does not govern those websites. You should read their privacy policies and make an informed decision about whether you want to use those websites or their services.

## Changes to this Privacy Commitment

**Here's the summary:**

**We may make changes to this notice and we will notify you of the changes to our information practices.**

**Here's the detail:**

This Privacy Commitment may be updated from time to time to reflect changes to our practices. Any notices regarding modifications to this Privacy Commitment will be in written form and provided to you on the Roulston's ReadyRx platform and on our website.

If any changes to this Privacy Commitment are significant, we will provide a more prominent notice (including email notification, if appropriate).

We encourage you to periodically review our Privacy Commitment for the latest information on our privacy practices and to contact us if you have any questions or concerns.

## Questions, Complaints, and Contact

**Here's the summary:**

**You can always reach us at [wcpharmacy@roulston.com](mailto:wcpharmacy@roulston.com) if you have privacy questions, concerns or complaints.**

## Here's the detail:

Please contact us at [wcparmacy@roulston.com](mailto:wcparmacy@roulston.com) or the address below if:

- you have any questions related to the collection, use and disclosure of your Personal Information;
- you need to report any privacy or security violations, including any suspected or actual unauthorized access, use, disclosure or loss of Personal Information;
- you wish to withdraw your consent to the collection, use or disclosure of Personal Information;
- you have any questions or comments about this Privacy Commitment; or
- you otherwise have a question or complaint about the manner in which we or our service providers treat your Personal Information, including our policies and practices with respect to the use of service providers outside Canada.

If you wish to access, update, and/or correct inaccuracies in your Personal Information, please contact us at [wcparmacy@roulston.com](mailto:wcparmacy@roulston.com).

If you have concerns with our Privacy Commitment or privacy practices, we encourage you to first bring your concerns to us at [wcparmacy@roulston.com](mailto:wcparmacy@roulston.com). You may also seek advice from the Office of the Privacy Commissioner of Canada or the provincial Privacy Commissioner having jurisdiction, and, if appropriate, file a written complaint with the Commissioner's office.

To contact the applicable privacy commissioner, please visit the following websites:

Ontario: [www.ipc.on.ca](http://www.ipc.on.ca)