

Health and Wellness Privacy Notice

Effective Date: October 16, 2023

1 General Information About This Notice

- This notice describes how the personal health information of our customers (“you”) is collected, used, and disclosed in the context of health and wellness services offered:
 - by healthcare providers when you receive healthcare services at our locations or through our health and wellness programs
 - via our PC Health app health and wellness offerings; and
 - by us when we provide health and wellness services on behalf of third parties.
- This notice should be read together with any other privacy statements or notices available at our locations where healthcare services are provided, websites or mobile applications, which may have additional information relevant to your experience.
- This notice is governed by the [Loblaw Privacy Policy](#). If there is any inconsistency between this notice and the Loblaw Privacy Policy, the Loblaw Privacy Policy will prevail.

We and the healthcare providers who provide health and wellness services to you understand the responsibility that comes with collecting, using, and sharing your sensitive personal information, including personal health information, and are committed to protecting your privacy.

“**Personal health information**”, as used in this notice and the Loblaw Privacy Policy, is information about you that is gathered through the use of any of the healthcare services provided by regulated health professionals, including physicians, pharmacists, dietitians, opticians, nurses, nurse practitioners, physiotherapists, respiratory therapists and other healthcare providers and includes any information that identifies or can identify you and relates to the state of your health or the treatment you are receiving. More specifically, personal health information includes diagnostic, treatment and care information, and registration information.

2 Healthcare Services

What Information Do We Collect?

Depending on the healthcare service provided, personal health information collected may include your name, date of birth, home address, phone number, height, weight, health conditions, prescription and medical history, the type of healthcare service received, name and contact information of prescribing or referring healthcare provider and name and contact information of any authorized agent acting on your behalf, for example, a caregiver.

In general, your personal health information is collected directly from you or your authorized representative, or your healthcare provider. When necessary, our healthcare providers may need to speak to your physician and other healthcare providers within your circle of care in order to obtain the information they need.

- ❖ For more information on how your personal health information is collected, please visit the [Loblaw Privacy Policy](#) and review the section “How Do We Collect Personal Information?” or refer to any of the privacy statements or notices that are made available to you at the time of receiving a healthcare service.

How Do We Use This Information?

Your personal health information collected is used in connection with providing healthcare services to you, which may include:

- Dispensing your medications and providing initial and, where appropriate, on-going counseling with respect to your prescription(s);
- Delivering pharmacy professional services and, where appropriate, providing knowledge, information, and counseling in connection with such services, such as immunization information, adaptation of prescriptions, initiation of prescriptions, medication reviews, etc.;
- Communicating with you to advise you of prescription refills and other health-related information as well as services that may be of assistance or interest to you;
- Recommending programs, products, services, or events to manage your healthcare needs;
- Providing pharmacy or other health-related capabilities online or through mobile applications;
- Delivering other professional services, including primary care, dietitian, and optician services and treatments;
- Assisting physicians and other healthcare professionals as needed;
- Responding to requests made by, or on behalf of, your insurance provider to review your insurance claim(s);
- Managing your patient record, including medications dispensed and services or treatments provided;
- Obtaining and processing payments for prescriptions and healthcare services;
- Monitoring and investigating incidents and managing claims;
- If requested, referring you to other healthcare providers, such as our in-store dietitians, optometrists, respiratory therapists, or other health professionals; and
- Performing our obligations in accordance with, or complying with, applicable healthcare-related professional, legal, or regulatory requirements.

We may also use and disclose your personal health information for research and analytics purposes, where permitted by applicable laws. We will only share identifiable information about you with third parties for these purposes if we have your consent or where permitted by law; otherwise, this information will be de-identified by removing certain details, so the data will not be linked to you.

For example:

We may partner with academic institutions such as universities to perform clinical research on trends in the pharmaceutical industry.

- ❖ For more information on how your personal health information is used, please visit the [Loblaw Privacy Policy](#) and review the section “How Do We Use Personal Information?” or refer to any of the privacy statements or notices that are made available to you at the time of receiving a healthcare service.

How Do We Share This Information?

When you are provided with healthcare services, your personal health information may be shared with your healthcare providers and your authorized representative(s). Your personal health information may also be shared with others but only with your consent, as detailed in the Loblaw Privacy Policy and this Notice, or as otherwise permitted or required by law.

For example:

If you fill a prescription order in one of our pharmacies, we may share personal health information with your provincial drug benefit program, private health insurance provider, or other health claim adjudicator as necessary in order to process your claim.

Disclosure without Consent

Canadian law permits or requires the use or sharing of personal health information without consent in specific circumstances, including situations when necessary to protect healthcare providers, employees, customers, or others.

Service Providers

In the course of providing our programs, products, and services, your personal health information may be shared with service providers. These service providers help us operate our business, technology systems and applications, internal procedures, infrastructure, and advertising and marketing. Our service providers are required to limit their access to and/or use of personal health information that is necessary to provide their services, and to otherwise comply with our privacy requirements.

- ❖ For more information on how your personal health information is shared, please visit the [Loblaw Privacy Policy](#) and review the section “How We Do Share Personal Information?”.

3 PC Health App

The PC Health app (the “App”) is a health and wellness app provided by Shoppers Drug Mart Inc. and our affiliates. We may collect, use and disclose your personal information and/or personal health information to provide you with the following features of the App:

Prescription Management

The App provides you with a mobile version of your Shoppers Drug Mart and Loblaw online pharmacy accounts in order to help you manage your prescriptions via your smart phone or tablet. When you use the App to manage your prescriptions, the information you provide is transmitted to your pharmacy so that it can provide you with the requested pharmacy service and maintain an accurate and up-to-date patient record for you.

Get Care

The App can connect you to third party health care providers from whom you may obtain certain health care services either in person or through interactive audio and video technology. Personal health information collected by third party health care providers during an appointment or consultation may include your health card number, detailed health information, and family health history. Any information collected by a third party Provider through the App will be governed by the privacy policy and law applicable to the third party Provider; however, some personal health information, including the nature of the services received, diagnosis, and prescriptions, may be shared by the third party health care provider back with us to ensure that the App contains a comprehensive summary of the services you receive through the App, and to permit us to provide you with personalized insights and recommendations to improve your health and wellness.

Third-Party Applications

With your consent, we may collect personal information, including personal health information, about you from third party applications (for example, a wearable device). We use this information to build a comprehensive view of your health, provide actionable insights and personalize your App experience.

4 Third Party Health and Wellness Services

Some of our companies, including Specialty Health Network by Shoppers Drug Mart and MediSystem Pharmacy, may provide health and wellness services on behalf of third parties, such as drug manufacturers, long-term care homes and employers (“Clients”).

Ownership of Client Personal Information

As between us and our Clients, the Client owns and controls Client Personal Information. We acquire no rights in or custody or control over the Client Personal Information, except to the extent necessary to perform the services and in accordance with our contract with the client and applicable laws.

For example:

Specialty Health Network by Shoppers contracts with drug manufacturers to administer patient support programs on the manufacturer's behalf for patients with complex needs.

How do we Collect, Use and Disclose Client Personal Information?

We will only collect, use and disclose Client Personal Information to perform the services in accordance with our contract with our Client.

5 What Are Your Privacy Choices?

The personal health information that your healthcare providers collect is information that they need in order to provide healthcare services to you. If you choose not to provide your healthcare provider with certain personal health information or if you withdraw your consent, where such withdrawal is available, you may not be able to receive certain healthcare services. For more information on what privacy choices are available to you, please discuss this directly with your healthcare provider.

Information on how to manage your privacy choices (relating to non-healthcare services) is available in the section "How Do I Change My Privacy Choices?" of the [Loblaw Privacy Policy](#).

Who Can You Contact With Questions About This Privacy Notice?

If you have privacy questions relating to this notice, you can contact, as applicable:

- The Loblaw Privacy Office at loblawprivacy@loblaw.ca
- The Lifemark Privacy Officer at privacyofficer@lifemark.ca