

Last Updated: January 1, 2019

Summary of Revisions: Privacy Policy to comply with new Meaningful Consent Guidelines taking effect January 1, 2019.

Privacy Policy

This Privacy Policy pertains to Boehringer Ingelheim (Canada) Ltd./Ltée. and Boehringer Ingelheim Animal Health Canada Inc.

Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. is committed to protecting all personal information within its possession or control. We adhere to all relevant privacy laws in Canada and its provinces and territories including the principles in Section 1 of the *Personal Information Protection and Electronic Documents Act (Canada)*.

“We” or “Us” refers to Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. “You” or “Your” refers to users of this website.

Accountability

Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. is responsible for all personal information in its possession or control and has designated a Chief Privacy Officer who is responsible for the company’s compliance with this Privacy Policy and with all relevant privacy laws in Canada.

Personal Information Collected

Personal information means any information about an identifiable individual. The types of personal information that we may collect from you include, but is not limited to, your:

- name
- mailing address
- email address
- phone (or mobile number)
- location
- internet Protocol (IP) address
- browsing history on our websites.

The Purposes for Collecting Personal Information

We will only collect, use, and disclose your personal information for specific purposes that are identified to you. We will not use your personal information for purposes other than those identified and we will not keep your personal information for longer than is necessary to fulfill the purpose(s) of collection or as required by law. Personal information that is no longer required to fulfil an identified purpose will be erased, destroyed or made anonymous except as may be required by law.

We may collect personal information for many purposes, including, but not limited to:

- Notifying you of matters about which we are required by law to notify you (e.g. product recalls)
- Answering your questions and requests for services, and for soliciting your feedback
- Internal and external quality assurance/audits.

- Complying with demands or requests made by regulators, governments, courts or law enforcement authorities
- Maintaining a record of medical inquiries, product complaints, adverse events, or requests for information relating to our products and services, and reporting this information to the appropriate regulatory body, related company or those who we are required by law to notify, or whom it would be prudent to notify
- Developing, marketing or improving our products and services
- Administering disease awareness or other similar programs
- Keeping your contact information current
- Planning and coordinating continuing healthcare/industry programs
- Sending requested materials to Healthcare Professionals/Veterinarians and associated clinics
- Supplying clinical evaluating packages
- Operating and developing our websites
- Monitoring and analyzing trends, usage and interest in the information contained on our websites on an aggregate basis and assisting us in tailoring the information contained on those websites to our customers' needs and interests
- Creating aggregated information for data analysis and research. This aggregated information does not allow you to be personally identified or contacted, and is only used to understand user behaviour as a whole.

Boehringer Ingelheim (Canada) Ltd/Ltée. / Boehringer Ingelheim Animal Health Canada Inc. uses information acquired through internet websites that are not in a personally identifiable form, including aggregate information, to help improve our websites.

Operators of linked (third party) websites may also collect your personal information and information generated through the use of cookies when you link to their websites. This Privacy Policy does not apply to any linked website and Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. is not responsible for how such third parties collect, use or disclose your personal information. You should check the privacy policies of any linked website before providing any of your personal information to that website.

When is your Personal Information Collected

Your personal information is collected when you voluntarily provide it to us (e.g. via registration or feedback forms, chatrooms, or email), when you ask us specific questions, or when you use our websites or mobile applications. In some instances, we may collect your personal information in the course of you using our websites or mobile applications (e.g. your IP address or cookies may provide personal information as explained below).

Consent

Except as required or permitted by law and as provided below, Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. will obtain your consent for the use and disclosure of your personal information. The form of consent may vary depending on the circumstances and the type of information being requested. Consent can be express (express consent may be oral, in writing or electronic), implied (such as when you provide your name and address in order for us to send you products or information you have requested) and may be given by your authorized representative (such as a legal guardian).

When determining the appropriate form of consent, we take into account the sensitivity of the personal information, the reasons we are collecting it, and the reasonable expectations of the person giving the consent. We only collect personal information about you (information that could be used to identify you) when you voluntarily provide it to us by using our websites or mobile applications or by voluntarily disclosing the information.

Whenever you submit personal information, you consent to the collection, use and disclosure of that information in accordance with this Privacy Policy. If you do not agree to the collection, use or disclosure of your personal information in accordance with this Privacy Policy, please do not submit your personal information.

In some cases, we may passively collect personal information through your use of our websites or mobile applications. For example, your IP address or cookie may contain information that could make you identifiable. In such a case, your use of our websites or mobile applications without changing your browser settings constitutes your implied consent to the collection of that personal information. However, we will not use your information for purposes other than those identified in this Privacy Policy.

In certain circumstances, as permitted or required by law, we may collect, use or disclose your personal information without your knowledge or consent. These circumstances include, but are not limited to, the following: (i) information that is publicly available, (ii) where collection or use is clearly in the interests of the individual and consent cannot be obtained in a timely way, (iii) to investigate a breach of an agreement or a contravention of law, (iv) for the purposes of detecting, suppressing or preventing fraud, (v) to act in response to an emergency that threatens the life, health or security of an individual, or (vi) to comply with a subpoena, court order or warrant.

Consent Withdrawal

You may at any time withdraw your consent to the collection, use and disclosure of your personal information (Refer to the “Contact Us” section for how to do so). If you withdraw your consent, we will delete your personal information in a timely manner except as required by law (see below). However, withdrawing your consent may impair your ability to access certain information or websites.

In some cases, we are obliged to keep your personal information to comply with legal requirements and statutory retention periods (e.g. in the context of pharmacovigilance). In such a case, we will ensure that your data will only be used to comply with those obligations and not for other purposes.

Limiting Collection

Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. will limit the amount and type of personal information collected to that which is necessary for the purposes identified. In some instances, providing personal information is a condition of service, meaning that unless you provide the requested information, we are unable to provide you with the product, information or service you request. However, for other personal information, we will offer you the option of providing the information and will explain why we are requesting it. If you choose not to provide that other personal information, it will not affect your ability to access or obtain products, information or services.

Limiting Use, Disclosure and Retention

Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. will not use your personal information without your consent for purposes other than those for which it was collected or other than

in accordance with applicable laws. Personal information will only be retained for the time necessary to fulfill the purpose of collection or as required by law. Personal information that is no longer required to fulfil an identified purpose shall be erased, destroyed or made anonymous.

Use and disclosure of non-personal information

Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. will not treat information that you provide to us which is not personally identifiable as 'personal information', such as questions, comments, ideas or suggestions. Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. will be free to disclose such information through any means and use it for any purposes, in its sole discretion.

Accuracy of Personal Information

Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. will make reasonable efforts to ensure that personal information that we have gathered is kept up-to-date and accurate for the purposes outlined at the time of collection.

Children

Unless expressly stated, websites and mobile applications on which this Privacy Policy appears are not designed to attract children under the age of 13 years. Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. does not knowingly collect personal information from children under the age of 13 years on its websites or mobile applications. Should personal information from children under the age of 13 years be requested, we would only collect such information with the explicit consent of a parent or legal guardian over the age of 18 years.

Safeguards

Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. uses a variety of physical, organizational and technological measures to keep your personal information safe. Unfortunately, no data transmission over the internet or data storage system can be guaranteed as 100% secure. Any transmission is at your own risk.

If there is a privacy breach relating to your personal information, we will conduct an assessment as to whether the privacy breach creates a real risk of significant harm to you. Should we determine that the privacy breach creates a real risk of significant harm to you, we will provide you notice of the breach. The notice will include sufficient information to allow you to understand the significance of the breach and the steps to take, where possible, to reduce the risk of harm to you. We will also report any breach of security safeguards as required by law.

Transferring Information Outside of Canada

Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. may transfer your personal information outside of Canada. Where appropriate, we will ensure that your information is transferred in accordance with this Privacy Policy and is subject to appropriate safeguards such as entering into a data transfer agreement where necessary.

We may share your personal information with:

- **Regulators, governments and law enforcement authorities:** As a pharmaceutical company, we are subject to specific regulations, such as pharmacovigilance. Some of these laws require us to send your reports to regulators or other authorities worldwide. We only provide authorities with personal information if we are legally obliged to do so. In order to protect our rights or the rights of third parties, we may also disclose personal information to rights holders, consultants and authorities in accordance with applicable laws.
- **Service providers:** We engage service providers to process your personal information for the purposes described in this Privacy Policy. These service providers only process the data on our behalf, in accordance with our instructions and under our control in accordance with this Privacy Policy.
- **Boehringer Ingelheim Companies:** As part of a global group of companies, we involve other Boehringer Ingelheim companies that support us in processing personal information. These group companies process personal information in accordance with this Privacy Policy.

Openness

Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. will make available to individuals information about its policies and practices relating to the management of personal information.

Individual Access

Upon receipt of a written request, Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. will provide you with access to your personal information that is in our possession or control. Please refer to the 'Contact Us' section below on how to request access to your personal information. We will seek to comply with your request(s) as soon as reasonably practicable and in accordance with applicable privacy laws.

Challenging Compliance

Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. will investigate all complaints made to the Chief Privacy Officer regarding our compliance with this Privacy Policy and applicable privacy laws. Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. will take appropriate measures to amend its policies and practices should that be necessary or appropriate.

Managing Cookies

Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. may use cookies and other technologies such as web beacons and graphic tags or other similar device identifiers to operate our websites, improve user experience and understand how our websites and other platforms are being used. For example, we may use cookies to determine which parts of website have been visited.

A cookie is a small data file, downloaded onto a device when the user accesses certain websites. Cookies are widely used in order to make websites work, or work more efficiently, or to track your interests or preferences. For example, cookies will allow us to recognize your device on subsequent visits to our websites as described below.

A web beacon or graphic tag is a small transparent graphic image or string of code that is used in conjunction with cookies to allow us to record user activity on our websites. We may use web beacons or tags in conjunction with cookies to track your usage and activity on our websites or mobile application, or to remember

your preferences. We may also use web beacons or graphic tags in our email communications with you to determine which emails were opened.

We use the following types of cookies for different purposes, including:

- **Necessary and functional cookies:** Necessary and functional cookies are used for technical reasons to allow us to operate our websites and to remember your information when you visit our websites to make your experience more convenient. For example, we may use these cookies to re-establish your session at login after a previous session was cancelled due to user inactivity. Such cookies are not used to analyze use of our website.
- **Analytical cookies:** We also use cookies from Adobe Analytics, a web analytics service provided by Adobe Systems Software Ireland Limited ("Adobe"). Adobe Analytics uses cookies on behalf of Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. to analyze traffic and usage patterns. The IP address collected by the cookies is made anonymous before it is geolocated. In addition, it is replaced by a generic IP address. Adobe will not associate your IP address with other information held by Adobe. You can prevent Adobe from collecting and using information (cookies and IP address) by using your options at <http://www.adobe.com/privacy/opt-out.html>.

Information collected by cookies and other technologies generally do not allow you to be identified and, therefore, is non-personal information. To the extent that an IP address or cookie contains information that could be identifiable, we will treat this information as personal information. We will only use this information as aggregated non-identifiable information about the use of our website and to help us improve it.

If you do not want cookies enabled on your computer (or other device), you can deactivate them in your browser settings. However, deactivating cookies may affect the usability and functionality of our websites.

Managing Promotional Email

If you do not wish to receive promotional email from us, you can unsubscribe using the link at the bottom of the promotional email.

Policy Changes

Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc. reserves the right to change this Privacy Policy at any time. If we change this Privacy Statement, we will post any changes on this page of our website with a summary of the most recent changes at the top of the page. Please look at the "LAST UPDATED" legend at the top of this page to see when this Privacy Policy was last updated. You are advised to review this page regularly for any changes and to ensure you are aware of our current Privacy Policy. Your use of our websites or disclosure of personal information to us following these changes means that you accept the terms of the revised Privacy Policy.

Contact Us

To contact us with any questions or comments, or to review, correct, update or delete your personal information, you can contact us at the **following address:**

Boehringer Ingelheim (Canada) Ltd./Ltée. / Boehringer Ingelheim Animal Health Canada Inc.,
c/o Chief Privacy Officer,
5180 South Service Road, Burlington,

Ontario, Canada L7L 5H4;

By telephone at the following number: 1-800-263-5103;

By email at the following address: zrburchiefprivacyofficer@boehringer-ingenheim.com