Pets Plus Us Privacy Policy

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Overview:

PTZ Insurance Services Ltd., which offers products and services as Pets Plus Us, and its affiliates (collectively referred to herein as “Pets Plus Us”, "we", "us”, "our", etc.) are committed to protecting your privacy, and the confidentiality and accuracy of your Personal Information. This Privacy Policy explains how the Personal Information about an identifiable customer (“Personal Information”) will be collected, used, or disclosed. Your rights, obligations, and options regarding your Personal Information are outlined herein.

Throughout this policy, the term “customer” includes the “policy holder” and also refers to anyone who might visit our website as well as its subdomains (the “site(s)” or the “Website(s)”), sign up for our email marketing and communications, take part in any of our promotions or contests, request information, correspond or communicate with Us.

The term ‘Process’ herein refers to the collection, storage, use and disclosure of Personal Information.

If you do not agree with any part of this policy, you should not conduct any transactions with Pets Plus Us and navigate away from the Pets Plus Us Website immediately. Through continued use of our Website and/or by completing a transaction with us, you authorize and consent to the Processing of your Personal Information as describes in this policy, by PTZ Insurance Services, Ltd. and its affiliates and third-party service providers. This policy may change from time to time, and your continued use of our

websites and services is deemed to be acceptance of such changes, so please check the policy periodically for updates.

What is Personal Information?

Personal Information is any information or set of information about a natural person, which, either alone or in combination with other information, could be used to identify a person directly or indirectly.

The information we may collect may include but is not limited to:

- First and Last name
- Address
- Email Address
- Telephone Number
- Unique numerical identifiers such as an IP address or mobile device identifier
- Geolocation or precise geolocation based on product capability
- Financial Information
- Information related to products and services purchased, data concerning Website traffic and visits to the extent that such data is connected to a person's personal information.
- Information regarding your dealings with us, including policy information, claims history, and premiums
- Audio, electronic visual, or other similar records

Personal Information does not include information anonymized through the removal of identifying details in a way that ensures the data can no longer be connected to an individual.

Your Consent:

Your consent may be obtained in various ways. We may obtain your express consent, or we may determine that consent has been implied by the circumstances. Express consent could be in writing, web forms, or verbally in person or over the phone. When we receive Personal Information from you through our Website, by phone or by mail that enables us to provide you with a requested product or service, you consent to allow us to deal with that Personal Information in a reasonable manner.

Except in cases where consent is not legally required, we identify the reasons for collecting your Personal Information before or at the time of collecting it.

It is important that you understand and consent to our collection, use, and disclosure of your Personal Information. We rely on the following actions by you as indications of your consent to our existing and future use of your Personal Information for Identified Purposes, until you notify us of a withdrawal of your consent:

- Your voluntary provision of Personal Information directly to us or through an insurance broker or representative for the purpose of acquiring an insurance contract or related service or product (including information previously provided to us);
- Your express consent or acknowledgement contained, for example, within a written, verbal or electronic application process;
- Your consent solicited by us (or our agent) for a specified purpose;

- Your receipt of this Privacy Policy; or
- Your consent given through your authorized representative such as a legal guardian, agent or holder of a power of attorney.

By providing Personal Information about a third party such as a family member, emergency contact, or secondary owner by any of the above methods, you represent that you have obtained their consent to the collection, use, and disclosure of such Personal Information in accordance with this Privacy Policy.

In the event you request changes, endorsements or renewals to your policy, the original consent provided directly to us, or indirectly through a third party, will remain in effect.

Age

The Pets Plus Us Website, products and services are not directed towards children under the age of 14, nor are we able to verify the ages of visitors to our websites. As such, we do not intentionally or knowingly collect or use personal information from children under 14. If you are a parent or legal guardian and think your child has provided Pets Plus Us with personal information without your knowledge or consent, please contact us and so we can delete any information.

Why We Collect and Use Personal Information

Collecting Personal Information about you is essential to our being able to provide you with the products and services that best meet the needs of you and your pet. Your decision to withhold information may limit or affect the quality of service that we can provide to you. We collect, use, and disclose Personal Information (including to and from your broker, our affiliates and/or subsidiaries and/or third-party providers/suppliers) for the following purposes:

- Offering and providing insurance quotes, policies and related products and services to you;
- Administering and processing insurance products and services, or their renewal;
- Ensuring policy holders obtain the appropriate services, discounts, and benefits in accordance with the applicable terms;
- Establishing and maintaining communications with you;
- Verifying your identity and the accuracy of your Personal Information through, for example, the exchange of information with government agencies, industry associations, brokers, or other insurers;
- Analyzing, assessing, underwriting, and reinsuring risks on a prudent basis;
- Determining and facilitating your payment of fees and premiums;
- Investigating and settling claims;
- Detecting and preventing fraud or other illegal activities;
- Compiling statistics and reporting to regulatory or industry entities in accordance with prudent insurance practices;
- Gathering your feedback to help us improve our products and services;
- For the purposes of studies, analyses, targeting, segmentation and identifying statistics, including to establish rates; to understand and analyze the interests, needs and preferences of policyholders, prospective customers, and Website visitors; to ensure the quality of products and services; to perform internal audits or verifications; and to carry out product and services improvement activities;

- To develop, design, improve, market, or recommend products and services to respond to the needs and interests of current prospective policyholders;
- To communicate with you, respond to questions or complaints, requests for advice or other inquiries you may have;
- Complying with the law or the requests of law enforcement agencies or regulators;
- For internal, external, and regulatory audit purposes;
- For the purposes of investigation and law enforcement;
- To send you marketing communications, and any offers on products or services that might be of interest to you;
- To recognize you and identify your preferences on our Website, social media, email platforms and mobile applications (as available), and to analyze their use, improve and personalize their content;
- To communicate with you regarding any changes to our programs and their operation.

In this Privacy Policy, the above list of Identified Purposes will be referred to as the "Identified Purposes". Pets Plus Us will not Process or disclose your Personal Information to any third party, for any other purpose except as identified or otherwise permitted by law. In the event that your Personal Information is used or disclosed for any purposes not reasonably related to the Identified Purposes, we will first obtain your consent for such purpose, except where prohibited by law.

Methods of Collecting Personal Information

Pets Plus Us may collect Personal Information from customers, policyholders and prospects in several ways, including verbal, written and electronic forms, through the Web, by telephone, mail, email, SMS and chat (as applicable), through its authorized third-party business partners, affiliates, or otherwise, including, but not limited to, when they:

- Request or obtain a quote for pet insurance;
- Complete a transaction with us, our affiliated companies, or our business partners. This includes products and services you have purchased from us or information about your payment history or claims;
- Participate in our contests, promotional offers or receive discounts or benefits;
- Sign up or accept to receive newsletters, promotional and marketing emails, or other communications from us concerning our products, services, promotions or events;
- Visit our Website or social media platforms or interact with emails or online advertising. Further details are provided in the Cookies & Digital Marketing section;
- Contact, interact or communicate with one of our representatives to submit a request for service, remark, question or complaint. In this regard, because some of our services are provided by telephone, the calls may be recorded to ensure the quality of our services and to protect both parties in the event of disagreement;
- Participate in a survey or customer research sent by us.

When we receive Personal Information from you through our Website, by phone or by mail that enables us to provide you with a requested product or service, or to respond to a specific question, request or complaint, you consent to allow us to deal with that Personal Information in a reasonable manner.

Pet Medical Information

We obtain or share your pet's medical information only in connection with specific products and services. This may include, but is not limited to, underwriting a pet insurance policy, processing a claim or any other use that we disclose to you before the information is collected. We have implemented measures designed to secure your pet's medical information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Retention of Personal Information

We will only collect, use, or disclose Personal Information that is necessary for the Identified Purposes. We will retain your Personal Information only as long as necessary to accomplish the Identified Purposes or to satisfy our legal or business obligations, including for the purposes of satisfying any legal, tax, accounting, or reporting requirements.

Some of the factors considered when determining the appropriate retention period for Personal Information, include the amount, nature, and sensitivity of the Personal Information Processed, the potential risk of harm from any unauthorized use or disclosure of your Personal Information, the purposes for which we Process your information, and applicable legal and contractual requirements.

As explained in the section 'Your Personal Information Rights', you can request the deletion of your Personal Information. Once the purposes for Processing the information have been fulfilled and the Personal Information is no longer required, or if you ask us to delete the information, we will delete it. In some circumstances we may permanently anonymize your Personal Information so that it can no longer be used to identify you in any way, in which case we may use the anonymized data without further notice to you.

Sharing of Personal Information

In order to conduct our business and offer you the products and services that you may want, we may share your information as allowed or required by law. We may share your information with our affiliates or third parties outside of the company to service, market or underwrite our products and services to you. We may share your information with insurance agents and brokers who sell our products and services. We may also share your information with companies that we have formal agreements with to sell our products and services.

Working with these businesses allows us to provide you with a broader selection of insurance and other related products and services from our companies. If any sharing of your information requires us to give you the option to opt-out of or opt-in to the information sharing, we will provide you with this option.

We may disclose Personal Information that you provide via this Website or mobile application to the following third parties:

- Our subsidiaries and affiliates;
- Third parties offering products or services included with purchase of an insurance product, where available provincially;
- Contractors and service providers we use to support our business, for example legal services, human resources management and training companies, collection agencies, marketing or other

creative or promotional agencies, information technology services and products companies and cloud, webhosting, and data processing services;
- In the event of merger, acquisition, or any form of sale of some or all our assets, in which case Personal Information held by us about our customers will be among the assets transferred to the buyer.

We may also disclose your Personal Information to third parties to:
- Comply with any court order or other legal obligation;
- Enforce or apply our Terms of Use;
- Protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

Third party insurance agents and brokers who may refer you to our products and services are not our employees and are not subject to our privacy policy. Contact your agent or broker to learn more about their privacy practices.

Transfer of Personal Information

We or service providers acting on our behalf may Process and/or store some or all of your Personal Information in jurisdictions outside of Canada, including the United States. You should note that some jurisdictions outside of Canada, or from province to province, may not have laws that provide privacy protections that are substantially similar to those in your home jurisdiction. Please note we will assess the any privacy risks involved with storing data in a particular jurisdiction in advance, as well as ensuring contractual obligations with our suppliers and contractors are written to provide protection that best matches the highest level of privacy deemed appropriate in Canada.

Links to Other Websites

Our Website contains links to other websites for informational or resource purposes. These other websites are not under our direct control, and they may collect information about you that we do not. We are not responsible for the privacy practices or the content of linked websites. We encourage you to reference the privacy policies of third-party websites and/or mobile applications before providing any Personal Information to them.

Marketing and Other Communications

Social Media: As an extension of our internet presence, Pets Plus Us, has social media accounts on Facebook, Instagram, LinkedIn, TikTok, or others. The social media accounts of businesses are public, and therefore we recommend anyone who chooses to interact via social media should first read the terms of use and confidentiality and privacy policies of those platforms to inform themselves of how Personal Information is used by those platforms. Since all content posted on any Pets Plus Us social media accounts can be viewed publicly, we recommend users exercise caution when providing or disclosing Personal Information or details about themselves.

Pets Plus Us often offers content or discussions on our social media accounts, which, depending on your account settings, you may allow us to access certain Personal Information associated with your social

media account(s). We do not receive direct access to users' private social media account information. Any data shared with us is governed by the privacy settings and policies of the social media platform. We may also collect the date and time you visited the page for the purpose of sharing. Pets Plus Us may use this information to confirm your identity and personalize your experience. We may also use the services provided by social media platforms to display targeted advertisements intended for the users of such platforms.

Email and advertising targeting: Pets Plus Us strives to manage all email addresses responsibly and in compliance with the applicable laws. Therefore, pursuant to the express consent you have given us, or the implied consent based on our existing business relationship, Pets Plus Us may send you promotional messages by email, unless you unsubscribe from such emails.

To better understand and improve the effectiveness of our email marketing efforts, when we send you an email for marketing purposes, we collect information to assess the open rate and to know whether you clicked on the links in the email, and which of our Website pages you visited.

You may remove your name from our mailing list at any time by following the unsubscribe link displayed at the bottom of every advertising email from Pets Plus Us. We will then delete your name from our electronic mailing lists as soon as practicable after receiving your request. Note that despite unsubscribing from our commercial messages, certain specific situations such as invoicing or information about your policy or membership allow us to send you emails in accordance with the exceptions provided by law.

Text Communications: We may utilize text messaging, or SMS, communications and we strive to ensure compliance with all applicable laws for responsible SMS communication. Therefore, to receive SMS updates and promotions, we will ask for your express written consent before communicating with you. Message and data rates imposed by your mobile provider may apply. Text message opt-in originator will not be shared with affiliates or third parties for marketing purposes without your consent.

If you choose to opt-out of receiving promotional SMS communications, you may do so at any time by simply responding "STOP" to our messages or by clicking the unsubscribe link in the message. However, we may continue to periodically communicate with you via SMS for non-promotional matters. To opt-out of these messages, you can update your communication preferences in your profile.

Cookies & Digital Marketing

Pets Plus Us websites and social media platforms, may use certain automated tools including cookies, browser analysis tools, server logs and web beacons to offer you a more customized browsing experience, to better recognize your needs, to follow trends, to target marketing initiatives and to offer you content that is more relevant to you. Third-party services may also be utilized to gather and analyze data about the areas visited on the websites (such as the page most frequented, time spent, search terms used and other engagement information) to further enhance the user experience.

Cookies: Our websites utilize cookies. A cookie is a small file stored on your computer or other browser-enabled device. We use cookies to enhance our websites, personalize the user experience, improve search speed, and identify when users revisit our websites. These cookies do not read data from your device or other websites' cookies. You have the option to refuse cookies by selecting the appropriate setting within your browser. However, if you choose to select this setting, it may impact your ability to access certain parts of our websites.

Targeted data made available by digital marketing service providers: We could also utilize services provided by third-party platforms e.g. Search and social media to present targeted advertisements, based on the user data collected by such platforms. In general, the way you engage with and receive advertisements on those platforms is governed by each platform's own respective privacy policy, terms of use, and preference options. We may also sometimes use third-party platforms to offer users more targeted advertising, based on multiple factors such as the platform's user data and interactions with us outside of the platform, as applicable.

Web Beacons: Website pages may contain electronic images known as web beacons or single-pixel gifs which allow the us to count visiting users as well as record other related statistics, such as measuring the popularity of specific content on the Website pages. Web beacons are only used to compile aggregated statistics about Website use.

Usage Details and IP Addresses: While you navigate around our Website, we may also collect information about your visit, including, but not limited to: traffic and location data and logs, other communication data resources that you access, as well as information about your device and internet connection, including your IP address, operating system and browser type, for system administration and to report aggregate data to our advertisers. This is considered statistical data and does not identify any individual.

Global Privacy Control: Our Website is enabled to receive and apply privacy preferences through Global Privacy Control. To learn more about Global Privacy Control, visit https://globalprivacycontrol.org

Web Analytics

Pets Plus Us may use analytical tools by Google, Inc. (Google Analytics, Google Tag Manager and Google Search Console) or others to evaluate data to analyze the browsing behaviour of visitors to its sites as well as to understand the allocation and the result of traffic sources. We do not collect personally identifiable information automatically, but we may tie any information collected through cookies to information you may have previously submitted. Google Analytics provides tools to opt out of their services. To opt out of Google Analytics Cookies, visit https://myadcenter.google.com/home and Google Analytics Opt-out Browser Add-on Download Page.

This site protected by reCAPTCHA and the Google Privacy Policy and Terms of Service apply. When your computer or device requests page access on one of our websites, the data gathered for web analytics may include, but may not be limited to Google Advertising ID (GAID) and/or Apple Identifier for

Advertisers (IDFA) for mobile users, date and time accessed, IP address (not including any visitor identifying details), browser and operating system, and pages visited and any documents downloaded.

The use of digital markers (i.e., “temporary” and “persistent” Cookies) is required. Personally identifiable information is not stored by or otherwise provided to service providers. IP addresses are de-identified by either masking them completely or in part prior to being transmitted to and stored on Google’s servers to safeguard your Personal Information.

The data collected for these purposes may be aggregated and utilized by Pets Plus for statistics, analysis, targeting needs and behaviour, verification, research, development, and reporting. This information is only made available to those individuals who require it for the performance of their job responsibilities.

For additional information and resources related to these analytical tools and the use of data, please refer to Google’s website directly.

Protecting Your Privacy

Safeguards & Storage: At Pets Plus Us, we employ physical, electronic and procedural safeguards to protect our systems and all Personal Information under our control against unauthorized access and use. All safety and security measures are appropriate to the sensitivity level of the information collected. When your Personal Information is no longer needed, security safeguards will also be employed to ensure the safe destruction of your Personal Information. We will use contractual and other means to control the use and disclosure of your Personal Information by third parties. We have implemented measures designed to secure your Personal Information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on our secure servers behind firewalls. Any payment transactions will be encrypted.

In some instances, we use Secure Socket Layer (SSL) encryption technology. SSL protects information as it crosses the Internet. You can tell if you are visiting a secure area by looking at the padlock symbol on your browser screen. If it is "locked," you have a secure session.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted to our Website or mobile application. Any transmission of Personal Information is at your own risk.

Privacy Training: Access to your information is limited to Pets Plus Us employees and consultants as well as Pets Plus Us agents and representatives who need to access it to perform their duties.

All persons authorized by Pets Plus Us who have access to Personal Information must keep the information confidential. Our service providers and agents are required to maintain client confidentiality and may not use the information for any unauthorized purpose. Employees are governed by strict standards and policies to ensure that Personal Information is secure and treated with the utmost care and respect.

Your Personal Information Rights

If you have a complaint regarding our compliance with our Privacy Policy or procedures, please contact our Privacy Officer who will investigate your complaint. If you are not satisfied with our response to a privacy-related inquiry or complaint, you may contact the Office of the Privacy Commissioner of Canada, or your provincial privacy commissioner, if applicable. We would be happy to provide their contact information upon request.

Pets Plus Us ensures that your various privacy rights and preferences can be easily enacted. Including the rights to access, verification, correction, and deletion of Personal Information which we Process. If you wish to know what Personal Information Pets Plus Us holds about you and verify it, correct it, or have it fully and deleted from our records, please contact us using the contact information provided in the Privacy Officer section below.

If you would like to opt out of receiving promotional and special offer emails, notify us, or follow the link provided at the bottom of every Pets Plus Us email.

Subject to certain legal or contractual restrictions and reasonable notice, you may withdraw your consent at any time. If you wish to withdraw your consent for the use of your Personal Information for all or part of the Identified Purposes, please submit a Privacy Rights Request.

In some cases, refusing to provide certain Personal Information or withdrawing consent for us to collect, use or disclose your Personal Information could mean that we cannot provide you with, or continue to provide you with, insurance coverage or other requested products, services, or information. We will inform you of any consequences of withdrawing your consent.

Please allow sufficient time for your request to be processed. It may take up to 10 days to process an email opt-out request, and up to 30 days for other requests.

If we are not able to provide access to all the Personal Information we hold about you, we will explain why. We will honor the request to delete unless one of the following exceptions applies:

- **Transactional:** information that is necessary to complete a transaction or contract for which it was collected.
- **Security:** to detect, prevent, or investigate security incidents.
- **Error Correction:** to identify and repair any errors or bugs.
    - **Non-identifying information:** To help diagnose problems and administer our site, information such as your IP address, browser type, and operating system may be gathered, but do not identify any individual.
- **Legal:** to comply with applicable laws or legal obligations, to protect against fraud or illegal activity, or to ensure the right of a consumer to exercise rights, such as free speech rights.
- **Internal Use:** to use in a lawful manner that is reasonably aligned with the expectations of the consumer and the context in which the consumer provided the information (i.e., improve our services).
- **Retention Periods:** see the ‘Retention of Personal Information’ section of this Policy for further details.

Privacy Officer

We respect all Personal Information under our control and have designated a Privacy Officer who is accountable to Senior Management for our compliance with this Privacy Policy.

If you would like more information regarding this Privacy Policy or your Personal Information, please email us at privacy@ipgpet.com - When you contact us, we may confirm your identity by asking you to confirm certain Personal Information and you may be directed to send us certain requests in writing.

What Do I Need to Provide When Making a Request?

In order to verify your identity when you are making a request, you may need to provide the following information if applicable:

- Name
- Telephone number
- Mailing address
- Email address
- Policy number
- Any additional information to help us identify you and your request

We will match this information to the information in our systems and under certain circumstances may request additional information via email or telephone to ensure we are interacting with the correct individual. We will maintain a record of your request.

Please be aware that we do not accept or process requests through other means (e.g., via fax, chats, social media, etc.).

How May I Make a Request?

You may make a request using one of the methods below:

- Submit a Privacy Rights Request
- Sending us a request via mail to:
  Attn: Privacy Officer
  Pets Plus Us
  710 Dorval Drive, Suite 400
  Oakville, ON L6K 3V7

Changes to this Policy

If we decide to make any changes to our privacy policy, those changes will go into effect on the effective date posted in the notice at the top of the revised privacy policy. The most current version of the privacy policy will apply to all current and past visitors of our websites and will replace any prior policies that are inconsistent. Your continued use of our websites and other services constitutes your acceptance of the practices described in the most current privacy policy.