



## Privacy Policy

### General Information

At Brava (a division of Blue Rabbit), we aim to improve the health animal health through a holistic approach to patient care. We take protecting the privacy and security of your information very seriously. This Privacy Policy explains who we are and help you understand what data we collect, why we collect it, and what we do with it. This policy applies to all individuals who access our website or engage with the products and services that we provide. This policy applies to Blue Rabbit and its wholly owned subsidiaries and may be referred to collectively hereafter as "Blue Rabbit", "we", "us" or "our".

We comply with data privacy regulations applicable in the jurisdictions where we operate. This policy may be reviewed and updated from time to time as laws change and industry best practices evolve. In the event we make material or significant changes, we will let you know through the communication channels that you have elected to receive from us or by placing a note on our website. Please review this policy periodically to make sure you are aware of the current policies.

### Information You Provide

We collect information when we interact with you. This includes when you create an account with us, order from us, engage with our sales or support teams or participate in surveys we may offer from time to time. The information that we collect includes information about you as a veterinarian, pet owner or your pet such as mailing address, email, telephone numbers, payment information and passwords.

This information is collected in order to operate effectively and provide you with the best customer experience. Data is provided directly from you as you interact with us but is also collected from third party sources (which includes other companies), such as if we use a service to determine a location based on your IP address in order to customize certain services to your location.

### Collection and Uses of Your Information

We use the data we collect for these basic purposes:

1. To operate our business and provide personalized services to you (including through our contractors such as delivery service providers or third parties that provide support to our email or cloud hosting solutions);



2. To send communications, including promotional communications;
3. To display advertising;
4. For regulatory compliance;
5. For legal reasons when we may be compelled to comply with inquiries from governmental authorities or to defend or protect our legal rights or claims as required by law; and,
6. In the event of a business transfer.

Specifically for Veterinary Practices: For practices that use our website or platform (both web or mobile applications), we collect data in user accounts, as well as access, use and archive information to help ensure that digital prescriptions and client/patient records are consistent and that you as the veterinary provider have access to these records. We may share practice information including name, sales volume, and products sold with manufacturers or other industry partners for compliance with contractual obligations related to regulatory requirements such as the drug supply chain security and transparency reporting requirements, or for marketing purposes.

For our pet and horse owners who access our veterinary storefronts, we will capture data related to your pet (patient record, prescription information) or you as the pet owner (such as but not limited to, payment information, mailing address, email, telephone). Information may be shared with our veterinarian as it relates to the purchases that you make from our pharmacy or through a clinic storefront.

We will NOT share personal information in any way that is not covered in this policy without obtaining your consent first.

### **Managing Your Data**

You have a right to access, correct and delete any personal data as well as the object to use of such data by written request at any time.

Web and Mobile Applications: You can adjust and manage the privacy of your information via these applications which allow you to opt out of certain features that we offer. By adjusting your device or browser settings, you can manage information by adjusting your profile, subscriptions, cookies or location services.

Email and Fax Communications: You may opt-out of emails or if applicable, facsimile communications through links in the emails you receive from us or contacting us through the contact information provided on the fax transmission you receive. Upon receiving such notice from you, we will no longer send future emails or facsimile messages to you.



Services: Use of our services is subject to your consent in the product or service terms of use. You may withdraw your consent at any time by unsubscribing and discontinuing use.

Contact Us: You may also contact us anytime at [brvlicensing@bluerabbit.vet](mailto:brvlicensing@bluerabbit.vet).

## **Protecting Your Data and Privacy**

Maintaining the security and privacy of your data is very important to us. To enhance privacy, we have built in technological and procedural safeguards designed to protect your information. Examples of the technical safeguards we have in place may include the following:

- requiring a password or unique token in order for you to access your personal information;
- using firewalls to protect information we hold;
- using Secure Socket Layer (SSL) encryption in transmitting personal information;
- limiting the number of personnel who have access to personal information;
- routinely backing up our systems to protect the integrity of the data in our systems.

Even with these efforts, there is always risk that an unauthorized third party may find a way around our security systems. In the event of such a breach, we will notify you. This notice will include what occurred, what information was breached and what we will or are doing to respond as well as who to contact with for questions.

## **Protecting Children's Privacy**

We offer products and services to veterinary clinics and their clients. As such, we do not knowingly sell products to, solicit, collect or retain personal information about children under the age of 18 without parental consent. If we learn that a child under 18 has submitted their personal information to us without such consent, we will take all reasonable measures to delete it from our databases and not use the information for any purpose (except where necessary). If you become aware of any personally identifiable information we have collected from children under 18, please contact us at [brvlicensing@bluerabbit.vet](mailto:brvlicensing@bluerabbit.vet).

## **How to Contact Us**

If you have any questions about this policy or our practices, please contact us at:

Blue Rabbit Ventures, Inc.  
Attn: Legal/Privacy Officer  
2 Union Street, Suite 500  
Portland, ME. 04101  
[brvlicensing@bluerabbit.vet](mailto:brvlicensing@bluerabbit.vet)



## California Privacy Supplement

The CALIFORNIA PRIVACY SUPPLEMENT ("Supplement") is in addition to the Privacy Policy and applies to residents of California. We have adopted this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA") and other related privacy laws. Any terms defined in the CCPA have the same meaning when used in this supplement.

When you interact with our products or services, including but not limited to, websites or mobile applications, we collect information on California residents that identifies, relates to, describes, references, is capable of being associated with, or linked to a particular consumer or device ("Personal Information"). This information may be obtained by veterinarian practices, veterinarian customers, directly from individuals using our services or purchasing goods from us. We have collected the following categories of Personal Information from consumers located in the State of California within the last twelve (12) months:

- Identifiers, which may include names and alias; postal address; unique personal identifier; online identifiers as detailed below; Internet Protocol ("IP") address; email address; telephone number; account number, name, and password; driver's license number, state or other government-issued identification card number; MAC address; and/or other similar identifiers;
- Commercial information, which may include purchasing and transaction history online and in stores, or consumer histories;
- Information relating to Internet activity or other electronic network activity, which may include cookie identifiers, clear gifs (a.k.a. web beacons/web bugs), browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, clickstream data, device platform, device version, and/or other device characteristics including your choice of settings such as Wi-Fi, Bluetooth, and Global Positioning System ("GPS"), CPU ID and type, build, model, manufacturer, operating system version, screen size, screen resolution, mobile network status, device locale, and carrier ID;
- Geolocation data, which may include Global Positioning System ("GPS") data; locational information based upon your IP address; cell network data; and/or other similar locational data; and which may be collected from various devices including your mobile device(s) or vehicle(s);
- Other personal information not listed above and described in California Civil Code § 1798.80(e), which may include signature; physical characteristics or description; and/or bank account number credit card number, debit card number, and other financial or health information).



We use Personal Information as set forth in the Blue Rabbit Privacy Policy. We have not sold Personal Information of California residents in the last twelve (12) months.

### Blue Rabbit Job Applicants and Employees

In addition to Personal Information set forth above, we also collect information provided by job applicants and employees. We have collected the following categories of Personal Information from job applicants and employees located in the State of California within the last twelve (12) months:

- Protected classification characteristics such as age, race, ancestry, national origin, marital status, medical conditions, and veteran status; and
- Professional or employment related information including job history or performance evaluations.

### Excluded Information

We do not collect biometric information, geolocation data, audio, visual, thermal, olfactory or other sensory data, educational records, non-public Family Education Rights and Privacy Act related data, or inferences obtained from Personal Information. Personal Information does not include information that is not identifiable, aggregated, publicly available in government records, or information otherwise excluded from CCPA's scope including the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, the Health Insurance Portability and Accountability Act of 1996 ("HIPAA") and other excluded state and federal laws.

### Your Right to Forget

As a California resident, subject to applicable law, you have the following rights under California law with respect to your personal information.

- **Right to Know.** You have the right to request what personal information we collect, use, disclose, and/or sell, as applicable.
- **Right to Delete.** You have the right to request the deletion of your personal information that is collected or maintained by us.
- **Right to Opt-Out of Sales.** You have the right to opt-out of the sale of your personal information by us.
- **Right to Non-Discrimination.** We may not discriminate against you because you have exercised any of the privacy rights described above.

You may also authorize someone to exercise the above rights on your behalf. Documentation will need to be provided that reflects that you have requested an authorized agent to make a



request on your behalf. This may include a Power of Attorney document or other signed document.

We must be able to reasonably verify your identity and authority to exercise these rights before fulfilling a request which may require you to provide Personal Information to us. There are also various exclusions and exceptions that apply to these rights under applicable laws.

### **Exercising Your Rights**

If you are a California resident, you may request to have your Personal Information deleted. When we receive a validated request and we are not otherwise legally obligated to retain such Personal Information, we will delete your Personal Information. We may deny your deletion request where we are legally required to retain your Personal Information, such as:

- When we are required to retain data to comply with a legal or contractual requirement such as a veterinarian customer of ours who is required to retain information we hold as part of your pet's medical records; and,
- To make use of any Personal Information pursuant to other recognized exceptions in the CCPA.

### **CCPA Requests**

Requests to access or delete your Personal Information may be made by calling 833-206-4460 or by submitting a written request to us. Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf may make a consumer request related to your Personal Information. Parents or guardians may make such requests on behalf of their child. You may only request access or deletion of Personal Information twice in any twelve (12) month period. Your request must include a valid email address and describe with sufficient detail for us to evaluate and respond to the request. We will not respond to requests without a verifiable and valid email address.

Making a request does not require you to create an account with us. We only use the information you provide in making the request to verify your authority to make the request and your identity. We do not discriminate against anyone making a CCPA request, and will not deny providing goods or services, charge different prices, or provide a different level of services based upon your CCPA request. We shall communicate with you via email if we need additional time to comply with a request or to provide you with reasons why we cannot comply with the request. If you request that we return information to you, it will be sent in a format so that you may transmit that information to another entity. We reserve the right to charge a fee for requests that we deem to be excessive, repetitive, or unfounded.



## Contact

You may contact us about your rights under CCPA as follows:

833-206-4460

Attn: Legal

[brvlicensing@bluerabbit.vet](mailto:brvlicensing@bluerabbit.vet)