

VETS FIRST CHOICE PRIVACY POLICY FOR PARTICIPATING VETERINARY PRACTICES

PLEASE READ THIS PRIVACY POLICY CAREFULLY BEFORE USING THIS SITE.

Last Updated: January 01, 2015

Direct Vet Marketing, Inc. (hereinafter, “**Vets First Choice**,” “**we**,” “**us**,” “**our**”) provides this web site located at www.vetsfirstchoice.com, our mobile applications and all content and services available through our web site and our mobile applications (collectively, the “**Site**”) subject to this Privacy Policy along with the **Terms of Service for Participating Veterinary Practices** (the “**Terms of Service**”).

BY ACCESSING AND/OR BY USING THE SITE, YOU AGREE THAT WE MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION AND NON-PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND TERMS OF SERVICE, AND AS PERMITTED OR REQUIRED BY LAW. If you do not agree with these terms, you do not have permission to use the Site or to provide any Personal Information to us.

1. General.

We do not collect any personally identifiable information (*i.e.*, Information that identifies you or can be used to identify you including information) (“**Personal Information**”) unless you voluntarily provide it to us. While you may use some of the functionality of the Site without registration, some of the features and services available through the Site will require you to create an account. If you do not create an account on or through the Site, the only information we collect from you will be “**Non-Personal Information**” (*i.e.*, Information that cannot be used to identify you, including information such as the web pages that you have viewed), as more fully described below. If you choose to create an account through the Site, we may require you to submit Personal Information. You are responsible for ensuring the accuracy of the Personal Information you submit to Vets First Choice. Inaccurate or out of data information will affect the information you receive when using the Site, our ability to contact you and our ability to provide services to you.

2. The Information We Gather.

Vets First Choice gathers two types of information about users:

2.1. Non-Personal Information. We may collect and aggregate certain Non-Personal Information from the users of our Site, including, without limitation, data regarding, which pages of the Site were visited, the order in which the pages of the Site were visited, and the hyperlinks which were “clicked.” Collecting such information involves the logging of the IP addresses, operating system, and browser software used by each Site user. Although such information is not Personal Information, we can determine from an IP address a user’s Internet Service Provider and the geographic location of his or her point of connectivity.

Cookies allow Vets First Choice to serve you better and more efficiently, personalize your experience with the Site and services offered on the Site, determine the length of time each user spends at any particular area of the Site, and ascertain the specific functionality that users choose to use. Cookies also may be used to facilitate a user’s log-in, but are not used to retain any Personal Information. Most browsers allow you to control how and whether Cookies will be accepted. If you reject our Cookies, certain of the functions and conveniences of the Site may not work properly, but you do not have to accept our Cookies in order to use portions of the Site.

2.2. Personal Information. We collect Personal Information from users at several different points on this Site, including, without limitation, when you create an account, set up your online store, provide information to the customers that participate in our Site, utilize social media and live chat, subscribe to e-mail newsletters, send e-cards or e-mail, participate in contests, sweepstakes and other promotions, or participate in online polls and surveys.

- (a) **Creating an Account.** In order to set up an online store for your practice, you will be required to create an account with us. During this process, you will need to provide us with Personal Information that may include, but may not be limited to, your first and last name, mailing address, e-mail address, telephone number and password as well as information about your practice. You acknowledge and agree that you are required to provide accurate and current information when registering for an account on our Site.
- (b) **Subscribing to Newsletters.** You may subscribe to e-mail newsletters offered by us. When you subscribe to our e-mail newsletter(s), we may ask for certain Personal Information.
- (c) **Participating In Contests, Sweepstakes and Other Promotions.** From time to time, Vets First Choice

may offer our participating veterinary practices the opportunity to participate in a contest, sweepstakes, rewards program or other promotion through the Site (each, a "Promotion"). If you elect to participate in any such Promotion, you will be asked to provide us with certain information necessary to conduct such Promotion, and your participation will be subject to the Terms of Use for this Site and any other rules applicable to such Promotion and posted on the Site or otherwise made available with the promotion.

- (d) **Participating in Online Polls and Surveys.** Vets First Choice may, from time to time, utilize online polls and/or surveys. If you elect to participate in any such online poll or survey, you may be asked to provide us with Personal Information, or you may be asked to provide only information that is not personally identifiable.

3. Use of the Information We Gather Through the Site.

Vets First Choice uses the Personal Information and Non-Personal Information that is collected via the Site for the purposes set forth below:

3.1. Non-Personal Information. Vets First Choice uses Non-Personal Information primarily in aggregate form to build higher quality, more useful services by performing statistical analyses of the collective characteristics and behavior of our users, and by measuring demographics and interests regarding specific areas of the Site.

3.2. Personal Information.

- (a) **Account Creation and Store Management.** Vets First Choice may use the Personal Information that we collect from you when you create an account to open and manage your account, to manage your store, to contact you in connection with your use of the Site and to track who uses the various features and functionality offered at the Site. Additionally, we may use this information in determining the types of features, functionality, products and services to offer through the Site or otherwise.
- (b) **Newsletter Subscriptions.** Vets First Choice uses contact information collected during subscription to send you the newsletter.
- (c) **Promotions.** Vets First Choice uses the Personal Information, if any, it may collect from you related to a contest, sweepstakes or other promotion (each, a "Promotion") through the Site for administering the Promotion. This Personal Information will not be re-used, sold or shared in any manner by Vets First Choice or any third parties unless you elect to receive additional information and promotional material from Vets First Choice and/or third parties. If a third party administers the Promotion, your participation may be subject to that third party's terms and conditions, and privacy policy. Detailed information about these terms will be provided on the applicable form you will be asked to fill out in order to participate in the Promotion.
- (d) **Communications with Vets First Choice.** When you send an e-mail message to or otherwise contact Vets First Choice, Vets First Choice may (i) use the information provided by you to respond to your communication and/or as described in this Privacy Policy; and (ii) archive this information.

4. Sharing and Disclosing Personal Information.

Vets First Choice does not sell your Personal Information and Non-Personal Information. We consider this information to be a vital part of our relationship with you. There are certain circumstances in which we may share your Personal Information and/or Non-Personal Information with certain third parties without further notice to you, as set forth below:

- (a) **Aggregate Data.** Vets First Choice may share aggregate data about the practices that participate in our Site and their clients with third parties, including our business partners.
- (b) **Disclosure for Operations and Maintenance.** Vets First Choice consultants and contractors ("Consultants") sometimes have limited access to the Personal Information that we collect through the Site in the course of providing products or services to Vets First Choice. These Consultants include vendors and suppliers that provide us with technology, services, and/or content related to better operation and maintenance of the Site. Unless you have opted-out of receiving e-mails and newsletters from Vets First Choice, these Consultants also may have access to your e-mail address to send newsletters to you on our behalf. Access to your Personal Information by these Consultants is limited to the information reasonably necessary for the Consultants to perform its limited function for Vets First Choice. We also contractually require that our Consultants not use or disclose your Personal Information for any purpose other than providing us with products and services, and that the Consultants secure your Personal Information with safeguards equivalent to our own safeguards.

- (c) **Government Authorities; Legal Rights and Actions.** Vets First Choice may share your Personal Information with various government authorities in response to subpoenas, court orders, or other legal process; to establish or exercise our legal rights; to defend against legal claims; or as otherwise required by law. In such cases we reserve the right to raise or waive any legal objection or right available to us. We also may share your Personal Information when we believe it is appropriate to investigate, prevent, or take action regarding illegal or suspected illegal activities; to protect and defend the rights, property, or safety of the Site, our users, customers, or others; and in connection with our Terms of Service and other applicable agreements. In the event that we are legally compelled to disclose your Personal Information to a third party, we will attempt to notify you unless doing so would violate law or a court order. Vets First Choice reserves the right to report any suspected illegal activity to, and cooperate with, law enforcement individuals or entities for investigation or prosecution.
- (d) **Exchanges of Information With the Veterinary Practices That Are Our Customers.** Vets First Choice may share your Personal Information with the clients of your practice that interact with us through the Site.
- (e) **Business Transfers:** As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Information may be part of the transferred assets.

5. Cookies and Web Beacons.

Vets First Choice uses a variety of technologies on our sites. Among these are cookies: a text-only string of information that a website transfers to the cookie file of the browser on your computer's hard disk so that the website can remember your browser in the future. A cookie will typically contain the name of the domain from which the cookie has come, the "lifetime" of the cookie, and a value, usually a unique number. When you visit our Site, open our email, or encounter our services online (perhaps on a customer's website) we may send you a cookie. Cookies may be used in many ways: they allow us to verify the login status of customers using products or services linked directly with our website, track point of entry to point of registration for those users participating in our affiliate signup programs, and track and measure the success of a particular marketing campaign. Cookies also allow us to track overall site usage and determine areas users prefer, enabling us to make your visit to our website easier by recognizing you when you return and helping to provide you with a customized experience.

Usage of a cookie is in no way linked to any Personal Information while on our Site. You have the ability to accept or decline cookies by modifying the settings in your browser. If you choose to disable cookies, you may still use our Site; however, you may have limited access to some areas within our Site. For more information on how to manage cookies in your web browser, see <http://www.aboutcookies.org>. We also provide you with an option to opt-out of receiving certain cookies associated with our online advertising. See "Online Advertising" below.

Some of our web pages, emails, and other online content may contain electronic images known as web beacons, also known as single-pixel GIFs, which are invisible graphical images. These web beacons allow us to count users who have visited our web pages, seen our ads, or opened our email. Web beacons collect only limited information, such as a cookie identifier, time and date of a page being viewed, and a description of the page on which the Web Beacon resides (the URL).

Flash cookies are also created by certain content on our pages using Adobe® Flash®, such as product tutorials. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored. Cookie management tools provided by your browser will not remove Flash cookies. To learn how to manage privacy and storage settings for Flash cookies see, http://www.macromedia.com/support/documentation/en/flashplayer/help/settings_manager.html. When we send you emails, we may include a web beacon to allow us to determine the number of people who open our emails. When you click on a link in an email, we record this individual response to allow us to customize our offerings to you. Web Beacons cannot be declined when delivered via a regular web page. However, Web Beacons can be refused when delivered via email. If you do not wish to receive Web Beacons via email, you will need to disable HTML images or refuse HTML (select Text only) emails via your email software.

6. Linked Sites.

For your convenience, our Site may contain links and/or references to web sites and other services operated by companies other than Vets First Choice ("Third Party Sites") that we believe may be of interest to you. Vets First Choice does not disclose your Personal Information to these Third Party Sites without obtaining your consent. Vets First Choice does not endorse and is not responsible for the privacy practices of these Third Party Sites. While on these sites, the Third Party Site may collect information about you. Because Vets First Choice does not control the information policies or practices of these third parties, you should carefully review the privacy policy posted on this other web site to understand how that Third Party Site collects and uses your Personal Information.

7. Social Media.

Through the Site, you can choose to access certain social media websites and services that are owned and/or controlled by third parties (including, without limitation, Facebook and Twitter) (such websites and services, collectively, the "Social Media Services"). When you elect to access and use the Social Media Services, you will be sharing your information (which will include Personal Information if you elect to share such information) with those Social Media Services. As with other Third Party Sites, the information that you share with the Social Media Services will be governed by the privacy policies and terms of service of the providers of such Social Media Services and not by the policies and procedures we describe here. You may also be able to modify your privacy settings with these Social Media Services to, for example, control what information the Social Media Services disclose to other entities, including Company. Please remember that the manner in which Social Media Services use, store and disclose your information is governed by the policies of the applicable Social Media Services provider, and, as a result, we shall not have any liability or responsibility for the privacy practices or other actions of Social Media Services that may be enabled within and/or otherwise accessible through the Site.

8. Security.

The security and confidentiality of your Personal Information is extremely important to us. We have implemented technical, administrative, and physical security measures to protect your Personal Information from unauthorized access and improper use. From time to time, we review our security procedures in order to consider appropriate new technology and methods. Despite Vets First Choice's efforts to protect your Personal Information, there is always some risk that an unauthorized third party may find a way around our security systems or that transmissions of your information over the Internet will be intercepted. In effort to protect your Personal Information, Vets First Choice (by itself or through its service providers) takes the following steps:

- (a) Requires both a personal username and a password in order for users to access their Personal Information;
- (b) Uses firewalls to protect information held in our servers;
- (c) Utilizes Secure Socket Layer (SSL) encryption in transmitting Personal Information to our servers. In order to take advantage of encryption technology, you must have an Internet browser which supports 128-bit encryption;
- (d) Monitors the limited number of Vets First Choice employees and Consultants who have potential access to Personal Information; and
- (e) Backs-up its systems to protect the integrity of Personal Information.

9. Changes To This Privacy Policy.

Our Site and our business may change from time to time. As a result, at times it may be necessary for Vets First Choice to make changes to this Privacy Policy. We reserve the right to update or modify this Privacy Policy at any time and from time to time without prior notice. If we make any material changes to this Privacy Policy, we will attempt to notify you by email (sent to the email address specified in your account) or by means of a notice on our Site prior to the changes becoming effective. Please review this Privacy Policy periodically, and especially before you provide any Personal Information. This Privacy Policy was last updated on the date indicated above. Your continued use of our Service after the effective date of any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

11. International Users.

The Site is hosted in the United States and is intended for and directed to users in the United States. If you access the Site from any region or country with laws or regulations governing personal data collection, use, and disclosure, that differ from United States laws, please be advised that through your continued use of the Site, which is governed by U.S. law, this Privacy Policy and our Terms of Use, you are transferring your Personal Information to the United States and you consent to that transfer.

12. Accessing, Changing or Deleting Your Personal Information.

If you want to (a) have your Personal Information deleted from our systems, (b) update the Personal Information that you have provided to us, or (c) change your preferences with respect to contacts or other activities, you can e-mail us at support@vetsfirstchoice.com. We try to promptly answer every e-mail, but may not always be able to do so. Keep in mind, however, that there will be residual information that will remain within Vets First Choice databases, access logs and other records, which may or may not contain Personal Information. Vets First Choice reserves the right, from time to time, to re-contact former users of the Site.

13. Questions, Comments or Concerns.

Should you have any questions, comments or complaints regarding this Agreement or the Site, please contact us via postal mail at:

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Or email us at:

Legal@vetsfirstchoice.com

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