



## Express Scripts Canada Internet Privacy Practice

### Privacy/Disclosure Statement

Express Scripts Canada<sup>1</sup> is firmly committed to protecting the confidentiality of our patients' personal and medical information. In this Privacy Practice document, any information containing your personally identifiable information which can be used to identify you (such as your name, mailing address, phone number, cell phone number, or e-mail address) is referred to as "Personal Information"; and any Personal Information containing your health or medical status is referred to as "Health-Related Personal Information". All **other** information (such as your IP address or the automatic tracking of the pages of this site that you access) is collectively referred to as "Non-Personal Information."

When you enroll in an Express Scripts Canada service, we ask that you disclose to us only the Personal Information required to meet your needs. Please understand that, when enrolling in a service, you are providing Personal Information on a voluntary basis. We have developed the following practices and policies to safeguard your information.

### Your Non-Personal Information

Express Scripts Canada reserves the right to use your Personal Information or Health-Related Personal Information to generate aggregate data (summarized data that does not identify you) for the following purposes:

- Express Scripts Canada is always seeking better ways to serve you. We may perform statistical analyses of the traffic patterns, site usage and behaviors associated with our websites. We may use these analyses to generate aggregate data which we may sell or disclose to other companies or organizations, including Express Scripts Canada's parent company, Express Scripts, Inc. (U.S.).
- Express Scripts Canada analyzes utilization information in the aggregate to study outcomes, costs, and provider profiles, and to suggest benefit designs for your employer or health plan. These studies generate aggregate data which we may sell or disclose to other companies or organizations.

### *Passive Information Collection*

- *General Tracking Information* - When you visit an Express Scripts website, we may *passively* collect Non-Personal Information from you, such as the Internet browser or computer operating system you are using. Our web server automatically collects this information, including your IP address, when you request pages from our server. Your IP address is a number that is used by computers connected to the Internet to identify your computer so that data (such as the web pages you request) can be sent to you. We aggregate this data with data on the pages visited by other users to track overall visitor traffic patterns. We use this information only to provide you with better service connections and improved websites. We will not sell or disclose your Non-Personal Information collected from the Express Scripts Canada website to other companies or organizations.
- *Cookies* - When you view one of our websites, we may store information on your computer. This information will be in the form of a cookie or similar file and will be used to determine ways to

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<sup>1</sup> Express Scripts Canada includes Express Scripts Canada Services and Express Scripts Canada Pharmacy.

improve our websites, advertisements, products or services. With most Internet browsers, you can erase cookies from your hard drive, block all cookies, or receive a warning before a cookie is stored. Please refer to your browser's instructions or online help files to learn more about these functions.

### **Your Personal Information**

When you register for an Express Scripts Canada service, you may voluntarily provide us with both Personal Information and Health-Related Personal Information.

Express Scripts Canada will not use or disclose your Personal Information or your Health-Related Personal Information in a manner inconsistent with applicable law. Examples of uses and disclosures include:

- We will provide you with pharmacy services and process your prescription drug claims. This process may involve sharing certain information with you or your doctor, pharmacist, insurance carrier, or plan member..
- We will process and send you orders you have placed through the Express Scripts Canada Pharmacy.
- We may send you information regarding health conditions, medicines, or promotional offers.

In certain circumstances, Express Scripts Canada may be legally compelled to release your Personal Information or Health-Related Personal Information in response to a court order, subpoena, search warrant, law or regulation. Under these circumstances, we will notify you unless doing so would violate the law or court order.

### **Family Member Information**

Express Script Canada's member-dedicated websites may include features through which you can view the prescription history for all eligible dependents and any household members under the age of 18. When registering to use these websites, subscribers can also elect to view the prescription history for any eligible dependents or anyone in the household. Such information is deemed to be that of the adult dependent's Health-Related Personal Information under this Privacy Practice and is included in the clauses protecting each member's Personal Information and Health-Related Personal Information.

To view prescription history information or other such Health-Related Personal Information for adult dependents, the subscriber must certify (at the time of registration by following the certification procedures and instructions on the registration pages of the website) that permission has been obtained from the affected dependents. The subscriber also must agree to use the dependents' prescription history solely for the purposes of prescription benefit management and/or pharmacy prescription services. By providing the certification, you understand and agree that you are strictly prohibited from using any adult dependent's Prescription history for any other purposes without the written consent of the adult dependent. Express Scripts disclaims all present and future liability for any use by you of an adult dependant's Health-Related Personal Information which exceeds the scope of your certification.

### **Correct/Update Your Information**

You can correct or update your Personal Information at any time using the following options:

Express Scripts Canada Internet Privacy Practice  
Updated: 12/6/11

Sign in to our website and update your personal information.

Call the Express Scripts Canada Member Contact Center or Express Scripts Canada Pharmacy toll-free at 1 (855) 550- MEDS (6337).

Write to:

Express Scripts Canada Pharmacy  
PO Box 700  
145 Queen Street South  
Streetsville, Ontario L5M 2C2

### **Sale or Transfer of Information in the Event of Merger, Sale, or Bankruptcy**

Express Scripts Canada considers the information obtained through its websites to be significant assets of Express Scripts Canada. As a result, in the event Express Scripts Canada is acquired, merges with another entity, becomes insolvent and/or declares bankruptcy, the websites, and any information obtained through them, may be transferred or sold to another entity, in accordance with applicable law.

### **E-Mail Privacy**

You can choose to receive e-mail from Express Scripts Canada on selected health topics and promotions. You can also use our websites to send an e-mail inquiry to Express Scripts Canada, which may result in a reply being sent to an e-mail address that you provide. Inquiries sent through our websites are secure and use Secure Socket Layer (SSL) technology.

Responses sent from the Express Scripts Canada customer service team to your e-mail provider may not be secure or may be intercepted by third parties. By using the e-mail service, you accept the risk of transmitting information from Express Scripts Canada to your personal e-mail address in an unsecure environment. If you are receiving e-mail correspondence at an employer's e-mail address, please note that, under law, the employer may be permitted to view the contents of any e-mail messages received at this address. If you are concerned about the confidentiality of your e-mail messages, you may wish to use a home e-mail address.

### **Usage by Children**

As stated in the Family Member Information section of this Privacy Practice, Express Script Canada's websites are neither intended nor designed to attract users who are under the age of 18. Express Scripts Canada is committed to preventing the unintentional collection of Personal Information and Health-Related Personal Information from dependents under the age of 18. Any Personal Information or Health-Related Personal Information of a dependent under 18 that is provided to Express Scripts Canada must be provided by the registered adult subscriber, and not by a dependent under the age of 18 who is using the Express Scripts Canada website. If you are the parent or legal guardian of a child under the age of 18 whom you have reason to believe has provided his or her own Personal Information or Health-Related Personal Information directly to Express Scripts Canada, you have the right to request the removal of that child's Personal Information or Health-Related Personal Information from the Express Scripts Canada database. In order to request such removal, please send an e-mail to [ExpressScriptsCanada\\_Privacy@Express-Scripts.com](mailto:ExpressScriptsCanada_Privacy@Express-Scripts.com) or call 1.888.677.0111.

### **Links to Other Sites**

Express Script Canada's websites may include links to other sites that are not related to, or are not the property of Express Scripts Canada. We are not responsible for the dependability or information security

of these other sites and the policies pertain only to Express Script Canada's websites. We encourage you to read the privacy policy of every Web site you visit.

### **Security of Personal Information and Health-Related Personal Information**

Express Scripts Canada utilizes commercial firewalls and router Access Control Lists at all public network access points to appropriately restrict network traffic. To ensure the security of your Personal Information and Health-Related Personal Information, Express Script Canada's websites support web browsers that use 128-bit encryption. While such browsers are not required to use Express Script Canada's websites, we strongly recommend their usage when viewing or entering information. Express Script Canada's internal network address space, which is where Personal Information is stored and protected, is not advertised to the Internet and all outside requests for information are blocked. A user must be properly authenticated with the appropriate access credentials in order to access any sensitive information.

### **Security of Website Transactions: Safe Shopping**

Express Scripts Canada is a Payment Card Industry (PCI) certified company. The PCI Data Security Standards is a set of 220 controls which must be in place in order for companies to process credit card data. Express Scripts Canada security is audited annually for Payment Card Industry (PCI) compliance.

By being PCI certified, Express Scripts Canada undergoes a thorough examination and review of our security infrastructure by an independent third party to ensure we are in compliance with industry standards. This review is performed annually and has checkpoints throughout the year that ensure security thresholds are maintained between certifications. Express Scripts Canada currently has its PCI Report on Compliance (ROC) certifying compliance with PCI requirements. Express Scripts Canada's websites use Secure Socket Layers (SSL) to ensure the confidentiality of your check card or credit card information. As your order is transmitted to us, SSL technology prevents other parties from viewing or obtaining your card information. After receiving your order, we separate your card information from the rest of your order data. We then store your card information on a separate server that is not accessible from the Internet. This prevents external parties, as well as unauthorized internal personnel, from viewing your information.

### **Outgoing Transmission Security**

Express Script Canada's websites use a Secure Socket Layer (SSL) protocol for all outgoing transmissions. SSL secretly encodes information that is being sent over the Internet, helping to ensure that the information remains confidential. Express Scripts Canada will do all that is reasonably possible to protect your information.

### **Changes in Our Privacy Policy**

Express Scripts Canada uses your Personal Information collected from you only within the scope of use described in this Privacy Practice. However, subject to the terms below, we reserve the right to change the terms of this Privacy Practice at any time without advance notice to you.

Announcements of policy changes will include any applicable instructions for rejecting the additional use, disclosure or sale of your information.

### **Your Acceptance of this Policy**

By using this website, you signify your acceptance of the terms of our Privacy Practice. If you do not agree to the terms of this Privacy Practice, please do not use our website. We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Practice at any time, therefore,

we recommend that you be aware of notices of any changes that will be provided to you, including the effective date at the bottom of this Privacy Practice, and that you review this Privacy Practice from time to time. Your continued use of our website following the posting of changes to these terms means you accept these changes.

### **How to Send Us Your Comments**

We welcome your comments. If you have general feedback regarding this Privacy Practice, please send an e-mail to [ExpressScriptsCanada\\_Privacy@Express-Scripts.com](mailto:ExpressScriptsCanada_Privacy@Express-Scripts.com) or call 1.888.677.0111. Upon submission, any suggestions you make regarding the website become the property of Express Scripts Canada, and Express Scripts Canada shall have the right to use any of your comments or suggestions without further permission from or notice to you. Specific questions regarding the enforcement of this policy should be directed to Express Scripts Canada's Chief Compliance Officer at [ExpressScriptsCanada\\_Privacy@Express-Scripts.com](mailto:ExpressScriptsCanada_Privacy@Express-Scripts.com) or call 1.888.677.0111.

### **Frequently Asked Questions**

#### **What is Express Scripts?**

The title "Express Scripts" encompasses all departments, divisions, affiliates and subsidiaries of Express Scripts, Inc. (U.S.) and Express Scripts Canada.

#### **What is Non-Personal Information?**

Non-Personal Information is information that can not personally identify you or be used to contact you. Examples include type of Internet browser, type of computer operating system, and the domain name of the website and / or Internet service provider from which you linked to our site or advertisement.

#### **What is Personal Information?**

Personal Information is information that could be used to identify or contact you. Examples include your name, e-mail address, mailing address, social security number and telephone number.

#### **What is Health-Related Personal Information?**

Health-Related Personal Information is any information that relates to your health or medical status, including names of your doctors, health conditions, medicines, etc.

#### **What is aggregate data?**

Aggregate data is summary level data, such as the number of members of a specific **gender** in a specific **postal code**, that have chosen a specific **service**. Aggregate data does not contain information that can be used to identify or contact you, such as your name, address, telephone number or e-mail address.

#### **What is a subscriber?**

A subscriber is the holder of the prescription benefit. Dependents are covered by the subscriber's benefit.

#### **Who is an eligible dependent?**

Eligible dependents are dependents of the client/plan member (e.g., spouse, parent, child, or guardian) who may use Express Scripts Canada's services (e.g., pharmacy prescription services) under the client's benefit plan.

#### **What is a Cookie?**

A "cookie" is a unique identifier that a website transfers to your hard drive for record-keeping purposes. Express Scripts Canada uses two kinds of cookies – session ID and persistent cookies. Session ID cookies are used to personalize your user experience and include only information which you or your health plan

have already provided to Express Scripts Canada. These cookies are deleted from your hard drive when you close your browser session. Persistent cookies are used to collect non-personally identifiable information such as Internet Protocol (IP) addresses, browser type, Internet Service Provider (ISP), referring/exit pages, platform type, date/time stamp and number of clicks.

**What is a server?**

A server is the computer or computer program that houses and/or distributes data.

**What is a firewall?**

A firewall is a set of related programs that protects the resources of a private network from users from other networks.