
The Internet Privacy Policy of the Express-Scripts.ca website

v. 2.0 Last revised: 4/6/15



Express Scripts Canada
PUBLIC

© 2016 Express Scripts Canada. All Rights Reserved.



[@ExpressRxCanada](#)



[Express Scripts Canada](#)



EXPRESS SCRIPTS®

This Internet Privacy Policy is provided by Express Scripts Canada (“**Express Scripts Canada**” “we”, “us” or “our”) to establish guidelines that govern collection of information from all visitors (“you” or “your”) who use the publicly available pages of the Express-Scripts.ca website located at <http://www.Express-Scripts.ca>, Registered Members of the Member Website, Registered Users of the Analytics Site, and those users who have been granted authorized access to non-publicly available portions of the Express-Scripts.ca website (individually and collectively, the “**Site**”). The Site is provided to you as a service to provide information about our company and benefit-related information, and as applicable, management of your Member account, access to mail order pharmacy services, and access to analytics information. The “**Member Website**” is a member-only account portal available through the Site which enables Registered Members to access their personal account information and to use certain other services offered only to them. The “**Analytics Website**” is a registered users-only account portal available through the Site which enables Registered Users to access analytic information.

“**Members**” are individual participants in a prescription drug benefit plan and/or who have ordered prescription drugs through mail order via the Express Scripts Canada pharmacy. Individual Members who are at least eighteen years old and who have submitted a completed account registration form on the Site, or have completed the appropriate registration process from their plan sponsor’s website, or have completed the registration process via telephone with a customer service representative and are having drugs filled through an Express Scripts Canada mail order pharmacy are all “**Registered Members**” who will be provided access to the Member Website after completing the registration process. “**Cardholders**” are Members of a prescription drug benefit plan who carry the membership under their name for themselves and their Covered Household Members. “**Covered Household Members**” mean individuals who are covered through the prescription drug benefit plan under the Member’s account. “**Spouse**” means a Covered Household Member who is designated as a spouse in accordance with the terms of the prescription drug benefit plan. “**Adult Dependent**” means a Covered Household Member who is eighteen years of age or older. “**Minor Dependent**” means a Covered Household Member who is under the age of eighteen. “**Registered Users**” are individuals who have been provided access to the Analytics Website.

We are firmly committed to protecting the confidentiality and security of your Personal Information. The term “**Personal Information**” means any information which can be used to identify a person including by way of example, but not limitation, name, date of birth, mailing address, home phone number, mobile phone number, e-mail address, credit card information, and/or Social Security number. “**Personal Health Information**” as that term is defined in the Ontario Personal Health Information Protection Act, 2004 and includes any information of a person related to health or medical status, including, by way of example, but not limitation, names of doctors, health conditions, medicines, and/or prescription information and history, paired with Personal Information.

In addition to this Internet Privacy Policy, the “**Notice of Privacy Practices**” or “**Corporate Privacy Policy**” describes how we may use and disclose Personal Health Information, and your rights to access and update your Personal Health Information and how to request restrictions on our use and disclosure of your Personal Health Information. To the extent any terms in this Internet Privacy Policy conflict with any terms in the Notice of Privacy Practices or Corporate Privacy Policy, the Notice of Privacy Practices or Corporate Privacy Policy will control and override the terms in this Internet Privacy Policy.

Collection and use of non-personal information

How We Collect Non-Personal Information

General Tracking Information

When you visit the Site, and during your interactions with the Site, we may collect Non-Personal Information from you. "**Non-Personal Information**" means a data element or collection of data elements that by itself cannot ordinarily be associated with a specific individual. Non-Personal Information includes by way of example but not limitation, the Internet browser or computer operating system you are using, your navigation of the Site including the pages of the Site that you access, the amount of time spent on various portions of the Site, the length and dates of your visits to the Site, and certain Site data captured through your interactions with the Site. Non-Personal Information may include information provided by you through the Site or otherwise (e.g., through a third-party site) that is not Personal Information or Personal Health Information. Non-Personal Information may be collected on an aggregated, anonymous basis through web server logs, cookies, ad servers, tracking pixels, web beacons, and similar Internet tracking devices (collectively "**Tracking Mechanisms**"). Web servers automatically collect Non-Personal Information when you request pages of the Site or other sites. Based on certain interactions with the Site, mailings, and third-party sites, and other communications with us, certain Non-Personal Information may be associated with your Personal Information such that your Non-Personal Information is identifiable with you. You may be able to opt-out of certain third-party associations by following customization and/or opt-out options as described below.

How We Use Non-Personal Information

The collected Non-Personal Information may be used by us and our affiliated companies for a variety of analytic and developmental purposes including to improve and enhance the Site and our products and services, to create new products and services, to customize your experience on the Site and other sites that you visit on the Internet, and to identify and/or offer products, services and website functionality that may be of interest to you.

We may use different kinds of cookies including session ID cookies and persistent cookies. Session ID cookies are used to personalize your user experience, to determine ways to improve the Site, Site content, and the services offered through the Site. 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.

You may set your browser to accept cookies, warn you when a cookie is sent, or turn off all cookies (except Flash cookies). Check your web browser's help menu or your mobile device settings to find out how. Some mobile devices store cookies not only in areas connected to the web browsers but also in an app-specific area, so you may have to check your app settings options to determine how to manage or delete cookies stored in these other areas. If you do not accept cookies, some features, services, or activities available through the Site may not function correctly and you may be unable to access certain content.

We may embed tracking pixels within various pages of the Site to enable use of site analytics. The site analytics enable us to determine the usage frequency of various areas of the Site and identify areas of the Site for enhancement. While you are visiting and after you leave the Site, we may use web beacons to notify



you of areas of the Site and other aspects of our organization and its affiliated companies in which you may be interested. Certain tracking pixels and web beacons may be cleared or reset through configuration of your web browser such as by clearing your cache. We may use ad servers to provide you with offers of possible interest.

We use your IP address so that we can send data (such as the pages you request) to you and collect Non-Personal Information during the process. We aggregate this Non-Personal Information with similar Non-Personal Information collected from other users to track overall visitor traffic patterns and help us understand Site usage and preferred and most frequently used pages, products and services, to provide you with better service, to improve Site use and functionality, and to provide you with information on other products and services that may be of interest to you.

We may analyze Non-Personal Information in the aggregate to study outcomes, costs, and provider profiles, and to suggest benefit designs for employers or health plans. These studies may generate Aggregate Data (described below) which we may utilize for a variety of purposes.

We may perform statistical analyses of the traffic patterns, Site usage, and behaviors associated with the Site. We may use these analyses to generate Aggregate Data from the original Non-Personal Information. “**Aggregate Data**” is summary level data, such as the number of web visitors in a specific geographic area. 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, and does not reflect the original form of the Non-Personal Information collected from you.

Third-Party Usage

We work with third parties to (a) operate and maintain the server(s) on which the Site operates, (b) provide Tracking Mechanism(s) that we embed in or use with the Site, (c) provide advertisements and other information to you about the Site, products, and services through a third-party site based on a prior visit to the Site, (d) analyze communication with us and interactions with the Site, (e) de-identify data, and (f) collect Non-Personal Information from you (e.g., on your interactions and/or experience with the Site and/or us). The third party may then share the Non-Personal Information, Aggregate Data, and/or other data with us.

We may disclose Non-Personal Information to third parties as follows:

- We may share Non-Personal Information with our affiliated companies and third parties who provide services to us.
- We may disclose Aggregate Data to other companies or organizations for any legitimate business purpose.
- We may disclose products and services developed using the Non-Personal Information, including products and services that disclose anonymous and/or deidentified Site data for any legitimate business purpose.
- We will not sell your Non-Personal Information to other companies or organizations.

Some of the third parties, such as Google®, Twitter®, and LinkedIn® may provide customization and/or opt-out of certain Tracking Mechanisms through their respective sites. For example, Google's Ads Settings, DoubleClick opt-out page, Twitter's promoted content settings, LinkedIn account settings, and Network

Advertising Initiative opt-out page may limit the collection and usage of certain third-party Tracking Mechanisms.

Collection and use of personal information and personal health information

How We Collect Your Personal Information and Personal Health Information

Member Website Registration

Registration for the Member Website is optional; however, Registered Members are provided access to the Member Website and to information and online services not provided on the public website, as well as the ability to login to the Member Website when revisiting the Site. The Personal Information and Personal Health Information you disclose to us during registration and in connection with the Member Website is provided strictly on a voluntary basis. We may also collect Non-Personal Information during the registration process as described above. When you become a Registered Member, you may be asked to provide us with the Personal Information and/or Personal Health Information of one or more of your Covered Household Members.

Analytics Website Registration

Registration for the Analytics Website is optional; however, Registered Users are provided access to the Analytics Website and to information and online services not provided on the public website, as well as the ability to login to the Analytics Website when revisiting the Site. The Personal Information you disclose to us during registration and in connection with the Analytics Website is provided strictly on a voluntary basis. We may also collect Non-Personal Information during the registration process as described above.

Purchases

In addition to providing Personal Information during the registration process, you may provide us with Personal Information or Personal Health Information when ordering and paying for products and/or if you choose to purchase products or services using our “e-check” electronic funds transfer program or through an automatic refill option.

Communications

We constantly seek to improve our ability to communicate with you in more effective ways. Our communications to you may provide (i) information associated with your prescription drug benefit plan, (ii) information associated with the order and/or delivery of prescription drugs and/or other products from our pharmacies and/or other providers, and (iii) other information that you have given us permission to send. We strive to send these different types of information in accordance with available communication channels, formats, and choices that you have expressed, in each case in compliance with applicable law. Not all types of information and communication channels, formats, and choices may be available to you or honored at a particular time. For example, the communication preferences available to you through the Site may differ from those available to others depending upon your particular prescription drug benefit plan. An expressed communication preference may not be immediately honored for all communications associated with the preference. However, the preference may be honored for future communications when possible. We may also communicate with you through one or more communication channels to enable us to more effectively provide our services to you and on behalf of your plan sponsor.

Certain communications may include additional ways for you to express preferences. When your preference is expressed in this manner, such preference may be limited to a certain type of information, communication channel, and/or communication format as applicable. For example, if you select an opt-out option available in a particular e-mail, you may only have opted-out of a certain type of e-mail (e.g., promotional e-mails). We encourage you to review your communication preferences page(s) from time to time to review your communication options and expressed preferences.

The sending and receipt of communications in certain communication channels may cause you to incur messaging, data usage, or other fees from your services provider. By selecting such communication channels, you agree that you are solely responsible for these fees.

By registering for use of the Member Site, we will communicate with you via the e-mail address that you have provided for site related purposes. This communication preference will provide you with certain communications through e-mail that were previously provided by automated outbound telephone calls or mail, and some additional communications that you would not have otherwise received. You may modify certain communication preferences on the communication preferences page of the Member Site, and/or may also contact us via telephone to modify certain communication preferences. For example, if you do not wish to receive e-mails or certain types of e-mails from us, you may so designate on the communication preferences page. In general, once you have authorized us to utilize a particular manner of communicating with you, we may cease communicating with you through other communication channels, unless otherwise required by law.

At times, we may utilize communication channels not designated in your communication preferences, or may contact you regarding a particular issue or through a particular communication channel despite an otherwise stated communication preference. In certain instances, we may communicate with you through a different communication channel, or we may utilize multiple communication channels to reach you. Examples of when we may not be able to fully follow your communication preferences include when required by law, when a communication channel is or becomes unavailable, when we are unable to reach you by your preferred communication channel, when you have reached out to us by a particular communication channel and we respond by communicating with you through the same communication channel, or in the case of an emergency or other extenuating circumstance. You may continue to use all communication channels available to you to reach us regardless of your communication preferences.

Depending on the functionality available to you through the Site, you may be able to set communications preferences (i) at an individual level so that they are only applicable to you, or (ii) at a family level when you are the Cardholder (or Sponsor) so that the communication preferences are applicable to your Covered Household Members.

You may also be able to designate certain uses of your Personal Health Information with our communications. For example, you may be able to designate whether certain Personal Health Information can be included in communications to you regarding your prescription drug benefit plan and order and/or delivery of prescription drugs. You may also be able to authorize the sending of other communications with information and opportunities that may be of interest to you. For example, these communications could include the opportunity to purchase additional products, engage in promotional surveys, obtain additional health and wellness information, and the like.

Social Media

When you communicate with us through social media, or provide a comment directed at us through social media, we may use social media to communicate with you. We may also promote content of interest to you through social media. You may opt out or configure your social media account settings to limit promotion of such content. No Personal Health Information will be used to promote content or shared with a social media provider in making such communications to you.

Analytics

We may use certain in-house or third-party functionality to analyze your communications with us and interactions with the Site. These third parties will be required to protect any Personal Information in accordance with this Policy. Third parties will not capture, be provided with access to, nor utilize Personal Health Information as part of their analysis. Other analytics capabilities are reflected above in the description of Non-Personal Information.

How We Use Your Personal Information and Personal Health Information

We will not collect, use or disclose your Personal Information or your Personal Health Information in a manner inconsistent with applicable law, this Internet Privacy Policy, the Notice of Privacy Practices or Corporate Privacy Policy. A few specific examples of our uses and disclosures include:

- We may disclose protected versions of your Personal Information and/or de-identified data with third parties that maintain a database of existing Personal Information to match respective protected versions of Personal Information. These third parties may then make targeted non-personal communications to an aggregated audience regarding our offerings, applicable benefit information, and other potentially relevant information of interest to you.
- We generally manage your Personal Information separately from the Personal Information held by your plan sponsor. However, from time to time and at our discretion, we may communicate with your plan sponsor or payor to enable verification and/or correction of your Personal Information for benefit communication purposes.
- We may act on behalf of or otherwise cooperate with your health plan or plan sponsor to enable sending of health or plan sponsor information to you using your Personal Information.
- We may communicate with you via e-mail, facsimile, letter, text message, mobile application, and similar mechanisms.
- We may use third-party agents for purposes of communicating with you and/or collecting information from you.
- Statements here and elsewhere on the Site concerning the treatment of your Personal Information and Personal Health Information may not apply with respect to information already in our possession.

“Do Not Track” Signals and Similar Mechanisms

Our Site does not respond to web browser “do not track” signals and similar mechanisms. However, you may control certain Tracking Mechanisms as described above.

Covered Household Members Personal Information and Personal Health Information

Our Member Website may include features through which Registered Members may view their own Personal Health Information (such as their prescription history) and their Personal Information. In addition, Cardholders may use the Member Website to view Personal Health Information and Personal Information or manage the benefit of any Covered Household Members under the age of eighteen. Spouses and Adult Dependents may similarly register with the Member Website to access their Personal Health Information and Personal Information. The Cardholder, Spouse, or Adult Dependent may grant access to another person to view the granting person’s Personal Health Information. Covered Household Members who are either Minor Dependents or flagged are not provided with access to the Member Website, but may continue to call the number on the back of their benefit card to transact business with Express Scripts Canada.

The availability of the Personal Health Information and Personal Information of the Cardholder and other Covered Household Members may depend on Cardholder preferences, client preferences, available Member Website functionality, and applicable law. For example, the Cardholder may be able to:

- view the Personal Health Information of all Covered Household Members including Adult Dependents.
- grant access to a Spouse and/or Adult Dependents to view the Personal Health Information and Personal Information;
- grant access to a Spouse to view the Personal Health Information and Personal Information of only designated Minor Dependents while preventing the viewing of the Personal Health Information and Personal Information of other Minor Dependents; and
- grant access to a Spouse to view the Personal Health Information and Personal Information of Minor Dependents while preventing the viewing of the Personal Health Information and Personal Information of the Cardholder.

How You Can Correct/Update Your Personal Information and/or Personal Health Information

You may be able to correct or update your Personal Information or Personal Health Information using the following options:

- Login to the Member Website and update your Personal Information.
- Call the Member contact center.



Transfer of Personal Information, Personal Health Information and Non-Personal Information

If we are acquired, merge with another entity, or we divest one or more of our businesses, affiliates or subsidiary companies, the Sites, and any Personal Information, Personal Health Information, and Non-Personal Information obtained through them, may be transferred to an applicable entity for the purposes of continuation of services, in accordance with applicable law and the Notice of Privacy Practices or Corporate Privacy Policy.

Usage by Children

Our Site is neither intended for nor designed to attract users who are under the age of 18. We are committed to preventing the unintentional collection of Personal Information and Personal Health Information from children under the age of 13. Any Personal Information and Personal Health Information of a child under 13 that is provided to us must be provided by a parent or legal guardian, and not by a child under the age of 13 who is using the Site.

If you are the parent or legal guardian of a child under the age of 13 whom you have reason to believe has provided his or her own Personal Information or Personal Health Information to us, you have the right to request the removal of that child's Personal Information and/or Personal Health Information from our database. In order to request such removal, please send an e-mail to expressscriptscanada_privacy@express-scripts.com. You will be required to verify your identity as the child's parent or legal guardian in order to have their Personal Information or Personal Health Information removed.

Linking Policy

Our Site may contain hyperlinks allowing our users to connect to other websites owned by us and our affiliated companies and websites owned by our third-party vendors, distributors, and providers (“**Linked Sites**”). You may also access our Site through a hyperlink embedded in a Linked Site. We provide hyperlinks to the Linked Sites to enable you to conveniently access websites that may be of interest to you. Please note that once you click on a hyperlink that transfers you from our Site to a Linked Site, you have left our Site, and this Internet Privacy Policy will immediately cease to apply to any subsequent activity on the Linked Site. We are under no obligation to notify you when you have left our Site and have accessed a Linked Site. Use of any Linked Site will be governed by the privacy policy, terms of use, and/or other policies (if any) on the Linked Site. You may, at your option, participate in surveys or provide other information to our affiliates that control a Linked Site, and that information may be shared with us or with others subject to the privacy policy terms set forth on that Linked Site. Certain Non-Personal Information that you choose to provide through a Linked Site (such as comments) that is subsequently provided to us by the Linked Site provider in connection with a service engagement may be identifiable to us as your Personal Information.

Security statement

We are committed to protecting the privacy and security of this Site. We take reasonable technical and procedural precautions to protect the information received by us. Our Internet infrastructure is protected using industry recognized commercial security products, including current encryption technology, and best practice procedures for maintenance of the website. In addition, our infrastructure is monitored 24 hours a day, seven days a week.

No method of transmission over the Internet or storage of data on an Internet server is 100% secure. Although we use commercially acceptable and reasonable precautions to protect your information, we do not guarantee its absolute security.

[Your Acceptance of this Internet Privacy Policy](#)

You are deemed to have assented to the terms and conditions contained in this Internet Privacy Policy when you use the Site and/or when you have indicated in your online registration that you accept the Terms of Use into which this Internet Privacy Policy is incorporated. You are deemed to have accepted this Internet Privacy Policy each time you access the Site, the Member Website and/or Analytics Website after initial registration by using your login credentials. If you do not agree to the terms of this Internet Privacy Policy, please do not use the Site. The terms and conditions contained in this Internet Privacy Policy are subject to and may be superseded by applicable federal and provincial laws. You may withdraw your consent, subject to legal or contractual restrictions and reasonable notice. If you withdraw your consent, we may not be able to provide some products or services to you.

[Changes in Our Internet Privacy Policy](#)

We use Personal Information, Personal Health Information, and Non-Personal Information collected from you pursuant to the Site only within the scope of use described in this Internet Privacy Policy and Corporate Privacy Policy or Notice of Privacy Practices. However, we reserve the right, from time to time in our sole and absolute discretion, to change, to modify, or to add terms or remove terms from this Internet Privacy Policy. Changes to this Internet Privacy Policy will be reflected when we post a new version number and updated revision date. The version number includes a major number, a decimal point, and a minor number. A change to the major number reflects a significant change to the policy, while a change to the minor number reflects a less significant change to the policy. Examples of significant changes include additional provisions that reflect new Site functionality, significant modifications to existing provisions, and more significant changes to Site functionality that cause provisions to be modified, added, or removed. Examples of less significant changes include additional provisions that clarify current Site functionality, minor modifications to existing provisions, and less significant changes to Site functionality that cause provisions to be modified, added, or removed.

We will provide you with advance notice of a major change prior to your access of any portion of the Site for which registration is required. For example, we may (i) require that you reaccept the updated version of the web policies, (ii) send you an electronic notification advising of the update to the web policies, (iii) include a notice on the Site viewable without login advising of the update to the web policies, and/or (iv) advise you of the updated web policies during a phone call. We do not ordinarily provide advance notice of a minor change.

We recommend that you check the version number and revision date prior to using the Site, and that you review this Internet Privacy Policy on a frequent basis. Your continued use of the Site and/or utilization of any Site benefits after this Internet Privacy Policy has been updated (and after advance notice for a major change) indicates your agreement and acceptance of the updated version of the Internet Privacy Policy.

Contact

We welcome your comments. Upon written request, Express Scripts Canada will provide you access to your Personal Information and Personal Health Information, subject to certain exceptions as provided by the applicable legislation and the Corporate Privacy Policy. If you have comments, questions or complaints regarding our Internet Privacy Policy, the security of your Personal Information, Personal Health Information or our compliance with the applicable personal information protection legislation, or if you wish to request access to or correction of your Personal Information/Personal Health Information, please contact us at 1 855 333-3977 or by sending a note explaining your comment/request/complaint to the following address:

The Chief Privacy Officer

The Privacy Office

Express Scripts Canada

5770 Hurontario Street, 10th Floor

Mississauga, Ontario L5R 3G5

expressscriptscanada_privacy@express-scripts.com



Express Scripts Canada
PUBLIC

© 2016 Express Scripts Canada. All Rights Reserved.



[@ExpressRxCanada](https://twitter.com/ExpressRxCanada)



[Express Scripts Canada](https://www.linkedin.com/company/Express-Scripts-Canada)



EXPRESS SCRIPTS®