

## Vets First Choice Data Privacy Values

Vets First Choice is the leading provider of technology-enabled pharmacy services for companion and equine veterinary practitioners. We offer an innovative approach to advancing the delivery of animal health care with solutions that narrow gaps in patient care and drive improved financial and clinical outcomes for veterinarians and their clients. To achieve these objectives, we require the trust and cooperation of our veterinary practice partners, manufacturers, software providers, pet and horse owners, and other stakeholders to deliver high quality, secure and compliant solutions.

### Vets First Choice Privacy Values

Vets First Choice adheres to the following privacy values:

- Vets First Choice does not sell or share personally identifiable customer data (PII) with third parties without consent.
- Vets First Choice strives to build a digital ecosystem that improves animal healthcare and respects privacy.
- Vets First Choice considers personal data to be confidential and we treat it that way.
- Vets First Choice designs every new product to consider security from the beginning.
- Vets First Choice takes measures to anonymize personal data and restrict access to it whenever possible.

### Vets First Choice Data Security Standards

Vets First Choice maintains a high level of security in the handling, storage, and transmission of customer data including credit card information, prescription information, and PII, including as follows:

- Transaction security. Vets First Choice is a fully audited operator in the veterinary market operating at Payment Credit Card Industry Data (PCI) Security standard compliance for the protection customer of credit card data consistent with the obligations of a third-party payment processor.
- Confidentiality of Transactions. Vets First Choice complies with all state pharmacy rules in maintaining the confidentiality of customer transactions, including maintaining the security of personal information captured during check out and customer support interactions.
- Prescription adjudication. Vets First Choice has earned LegitScript registered pharmacy accreditation for the validation and secure transmission of electronic prescriptions to an accredited pharmacy provider.
- Cyber security. Vets First Choice is on the cutting edge of applying and implementing cyber security controls consistent with the National Institute of Standards and Technology (NIST) Cyber Security Framework, and has performed third party gap analysis validated by recognized industry cyber experts with both commercial and intelligence backgrounds. Vets First Choice regularly reviews and enhances our business practices and infrastructure to ensure compliance with

industry best practices. In that process, we fully respect and strive to achieve high standards for cyber and data security.

- Consumer privacy standards. Vets First Choice operates in the United States and is subject to state and US federal laws, including those that govern the privacy, use and deletion of customer information. Vets First Choice is in the process of configuring our systems to enable full compliance with the California Consumer Privacy Act, prior its effectiveness in 2020, and with similar laws and regulations governing handling, storage, use and protection of sensitive personal information that may be adopted by other states.

## **Compliance with Pharmacy Standards**

Vets First Choice pharmacies comply with all state and federal pharmacy regulations and have voluntarily achieved independent third-party accreditation, including as follows:

- Specialty pharmacy accreditation. All of Vets First Choice pharmacies have voluntarily achieved Pharmacy Compounding Accreditation Board (PCAB) accreditation, which is the most comprehensive compounding pharmacy compliance standard available in the US. Vets First Choice is also subject to the voluntary Verified Pharmacy Provider inspection and .Pharmacy accreditation by the National Association of Boards of Pharmacy.
- Compliance with pharmacy standards. Vets First Choice pharmacies are licensed by all 50 state Boards of Pharmacy and maintain compliance with all aspects of USP 795 and USP 797 standards. Vets First Choice pharmacies are prepared to meet USP 800 standards if adopted in the future.

## **Pharmacy Regulatory Disclosure Standards**

Vets First Choice pharmacies and outsourcing facilities maintain and disclose information pursuant to legal obligations under state and federal pharmacy regulatory and authorized distributor standards, including as follows:

- Vets First Choice pharmacies are obligated under state pharmacy laws to retain prescription records containing PII for up to seven years.
- Vets First Choice pharmacies are required to produce detailed prescription and other sales records containing PII upon request of any state pharmacy board.
- Vets First Choice complies with reporting requirements for controlled substances. Vets First Choice routinely discloses prescription records for sale of controlled substances, including names and other PII of pet owners, to state regulatory agencies.
- Vets First Choice complies with state pharmacy laws, including providing voice counseling to patients, and prescription dispensing requirements.
- Vets First Choice pharmacies and outsourcing facilities comply with state level pharmacy requirements governing patent communications related to prescriptions, including order confirmations, payment processing, drug recalls and safety information.

- Vets First Choice pharmacies and outsourcing facilities maintain DEA-required records for the manufacture, storage, and sale of controlled substances and produces records to DEA as required or requested.
- Vets First Choice maintains and retains all prescription records securely until Vets First Choice is legally allowed to delete them.
- Vets First Choice cooperates with all manufacturer requirements as an authorized distributor of commercial pharmaceutical products, including providing manufacturers with veterinary practice purchasing information to comply with manufacturer drug supply chain security and transparency reporting requirements.

## **How to contact Vets First Choice with questions**

If you have any questions about this policy or our practices at Vets First Choice, please contact us.

Vets First Choice  
7 Custom House Street  
Portland, ME 04101  
[privacy@vetsfirstchoice.com](mailto:privacy@vetsfirstchoice.com)