

Privacy Statement

Privacy Statement

Last Updated: January 15, 2019

This Privacy Statement sets forth the privacy practices for VGP Group LLC d/b/a Veterinary Growth Partners (the "VGP"), and the Services (as defined below). VGP and its affiliates (collectively, "VGP," "we," "us"), respect your privacy and are committed to protecting the personal information we hold about you collected through or in association with the website with a home page located at vgpvet.com (the "Website"), our mobile applications, if any (the "Apps"), or otherwise through your interactions with us to receive management or related services (together with the Website and the Apps, the "Services").

Please Review The Following Statement To Understand How We Collect, Use And Safeguard The Information You May Provide To Us Via The Services. This Statement May Be Revised From Time To Time, So Please Revisit This Page Often To Remain Fully Informed Of Our Policies.

By Using Any Of Our Services, Whether By Visiting The Website, Downloading Or Using An App, And/Or Voluntarily Providing Your Personal Information To Us Through The Services, You Acknowledge That You Have Read And Understand The Practices Contained In This Privacy Statement.

1. APPLICABILITY OF THIS PRIVACY STATEMENT

This Privacy Statement is subject to the agreements, including any Terms of Use, that govern your use of the Services. This Privacy Statement applies only to information submitted and/or collected through or in connection with the Services, and does not apply to information that we may collect other than through the Services. In addition, this Privacy Statement is applicable regardless of the means used to access or provide information through the Services (e.g., personal computer, mobile device, telephone, or any other technology or software known today or developed in the future) and to all users of Services.

This Privacy Statement does not apply to information about you collected by any other third party services, applications, websites, or advertisements associated with, linked to, or otherwise accessible from, the Services. **The information collected or received by such third parties is subject to their own privacy policies, statements, and practices and under no circumstances is VGP responsible or liable for any third party's compliance therewith.**

2. WHAT INFORMATION DO WE COLLECT?

We collect a variety of personal information from and about you through the Services, including both directly from you and automatically as a result of your use of and access to the Services.

You have choices about the information we collect. When you are asked to provide information, you may decline; but if you choose not to provide information that is necessary to provide a service or feature, you may not be able to use that service or feature. For example, if you order medications to be shipped to you through the Services, we will be unable to process or fulfill your order unless and until you provide certain information (e.g., billing information, shipping address) as part of the order process. In addition, as noted below in the section captioned "Cookies and Web Tracking," it is possible to change your browser settings to block the automatic collection of certain information. Finally, we may collect data that is not considered "personal information." To the extent such data is stored or associated with personal information, it will be treated as personal information; otherwise, such data may be used or distributed at our discretion.

Information Collected from You: When you choose to sign up for membership, participate in coaching sessions or clinic health assessments, request, order, or pay for services through the Services, whether by telephone, online through the Website or an App, we collect your name, email

address, telephone number, and address as well as other information necessary to complete your membership requests and/or other requests or services. Further, when you order or pay for goods, and/or services through the Services, we collect payment information, including billing and shipping addresses, financial information, as applicable. We also collect information from you that, depending on applicable law, may not constitute personal information. We also collect information about your vendor relationships and ordering information as well as detailed information about your clinics.

Location Information: If you permit the Website or an App to access information about your location (including global positioning system or “GPS” or general location information derived from the network you use to access the Services), we may collect the precise or general location information provided by your device to provide you with information about our locations closest to you. If you want to deactivate this feature, you can deny or remove the permission for the Website or App to access location information or deactivate location services on your device. Please refer to your device manufacturer or operating system instructions for instructions on how to do this.

Information Collected Automatically: When you browse the Website and/or download and use an App, we use commonly-used logging and analytics tools to collect information about your device, the network you use to access the Services, and information about your use of the Services. This includes software and hardware attributes of the device, unique device ID information, regional and language settings, performance data about the Services, network provider, and IP address (a number assigned to your computer when you use the Internet). In addition, information may also be collected passively in the form of log files and third-party analytics (including Smartlook) that record website activity. For example, log file entries and analytics data are generated every time a user visits a particular page on our Website, and track the dates and times that you use the Services, the pages you visit, the amount of time spent on specific pages, how specific pages are used, and other similar usage information, and general data (including the name of the web page from which you entered our Website).

Cookies, Web Tracking, and Advertising: We use certain technologies on the Services, including cookies and pixel tags, to personalize and enhance your experience on the Services, to collect data about your visit to our Services and sites upon which we advertise, to help diagnose problems with our servers, to administer the Services, and to gather broad demographic information. Cookies are small strings of text that are stored locally on your device that allow us to track certain information about your use of the Services. Most web browsers automatically accept cookies, but it is possible to change your browser settings so that it does not accept cookies (consult your browser’s “help” for more information about how to do this). However, rejecting cookies may prevent you from taking advantage of certain portions or functionality of the Services, such as our online membership application.

We allow some advertisers and other third party companies (including Google Analytics) to collect certain non-personal information when you visit the Services. While we do not track your movements across the Internet (See the section captioned “Do Not Track” below), these advertisers and other third parties, use tracking technologies to combine this non-personal information with other non-personal information gathered during your visits to other websites or when you use other mobile applications in order to provide advertisements about goods and services likely to be of greater interest to you. These companies typically use a cookie or a third party pixel tag to collect this information.

We use Google Analytics to serve advertisements across the Internet. These networks and exchanges may also collect identifiers designed to enable advertising on your device. These services may collect information and data about your activities online, both on our Services and on third-party platforms that participate in the ad network. This process helps us track the effectiveness of our marketing efforts. These third-party tracking technologies may be set to, among other things: (i) help deliver advertisements to you that are tailored to your individual interests, either by us, our affiliates, or third parties (sometimes referred to as “behavioral advertising”); (ii) prevent you from seeing the same advertisements too many times; and (iii) understand the effectiveness of the advertisements that have been delivered to you. Certain devices allow you to reset your advertising identifier at any time by accessing the privacy settings on your

device in order to restrict the delivery of tailored in-application advertisements (consult your device's documentation for more information about how to do this).

Information Collected from Third Parties: We may supplement the personal information we collect with personal information our partners collect or provide to us in conjunction with the Services. Additionally, if you choose to interact with VGP or our partners on social media, such as by posting to our pages, tagging us in posts, or participating in activities, we may collect certain information from the social media account you use to interact with us, including the name associated with the account, the account handle, and other information that may be contained on your social media profile.

3. HOW DO WE USE AND DISCLOSE INFORMATION?

We use and disclose personal information: (i) with your consent; (ii) as required or permitted by law; (iii) for legitimate business purposes; (iv) as necessary to complete any transaction or provide you with information or services you have requested or authorized; (v) to provide services to our partners; and (vi) to fulfill our legal responsibilities, in each case as provided in this Privacy Statement. Examples include:

Operational Uses:

- Processing your membership, responding to inquiries, and delivering services and products;
- Operating, maintaining, and improving the quality of the Services and the content, products and services available through the Services;
- Displaying content, products and services according to your interests and preferences, past orders, and activities;
- Providing faster methods for you to submit information to us and receive back the content, services or products you request and desire;
- Processing entries to and running contests, sweepstakes, programs and surveys;
- Communicating with you by mail, e-mail, text (SMS, MMS), phone and other methods of communication;
- To comply with applicable laws, regulations and rules, and requests of relevant law enforcement and/or other governmental agencies;
- To protect the rights, property, or safety of VGP, our users, and others; and
- For other purposes, as permitted or required by law.

Marketing Uses: We and our partners may use your personal information to send messages to you about us, our partners, and the content, products and services offered by us and our partners, including contests, rewards, events, and special offers for content, products and services, through direct messages and through ad networks. See the "Communications Opt-Out" section below for information about how you can opt out of marketing communications.

Sharing of Information: Some of the above uses involve sharing collected personal information with third parties, including service providers, affiliates, and partners. Examples who we share with include:

- Third-party service providers, including payment providers, software and Web developers, order processing and fulfillment services, and other vendors we engage to provide services to us;
- Our third-party partners providing pet products and services we believe are of interest to our customers; and
- Third-party analytics service providers, such as Google Analytics and Smartlook, in order to provide us and/or third parties who work for or are affiliated with us with information about the use of the Services and third party websites or applications, and to better understand how the Services are used.

Such information will Not include your name, address, or similar information. In addition, we may disclose information we maintain, including personal information: when permitted or required to do so by law, or in response to a request from a law enforcement agency or authority or any regulatory authority; and/or to protect the integrity of the Services or the interests, rights, property, or safety of VGP, our partners, our users, and others.

4. PROTECTING YOUR PERSONAL INFORMATION

We employ reasonable safeguards designed to promote the security of our systems and protect your personal information from unauthorized destruction, use, modification, or disclosure. Personal information is protected using various physical, administrative and/or technical safeguards. However, it is important to note that no method of safeguarding information is completely secure. While we try to ensure the protection of your personal information, we cannot guarantee that our safeguards will be effective or sufficient. In addition, you should be aware that Internet data transmission is not always secure and we cannot warrant that information you transmit utilizing the Services is secure.

5. MODIFICATIONS AND CORRECTIONS TO COLLECTED INFORMATION

We strive to maintain the accuracy of any personal information that may be collected from you, and will use our commercially reasonable efforts to respond promptly to update our database when you tell us the information in our database is not accurate. It is your responsibility to ensure that such information is accurate, complete and up-to-date. You may obtain from us, by email, the personal information in our records, although we may request certain reasonable additional information to help us authenticate such requests. If you wish to access, review, or make any changes to personal information you have provided to us through the Services, you may do so at any time by contacting us as provided below.

6. COMMUNICATIONS OPT OUT

You may opt out of receiving materials or other communications from us by following the opt-out link or other unsubscribe instructions provided in any email or text (SMS/MMS) message received, or by contacting us as provided at the end of this Privacy Statement. If you wish to opt out by sending us an email to the address provided below, please include "Opt-Out" in the email's subject line and include your name and email address in the body of the email. Note that if you do business with us, you may not opt out of automated notifications based on business transactions (e.g., e-commerce).

7. USE BY MINORS IS PROHIBITED

We do not permit children under 18 years of age to use the Services, and we do not knowingly collect information from children. By using the Services, you represent that you are 18 years of age or older.

8. THIRD PARTY WEBSITES

We may reference or provide links to third-party websites and services, including those of our partners and affiliates, and we are not responsible for and do not control the content, security, or privacy practices employed by such third-party websites and services. This Privacy Statement does not apply to any such third-party services; please refer to the privacy statements or policies for such third-party services for information about how they collect, use, and process personal information.

9. BUSINESS TRANSFER

We may, in the future, sell or otherwise transfer some or all of our assets to a third party. Personal information we obtain from or about you via the Services may be disclosed to any potential or actual third party purchasers of such assets and/or may be among those assets transferred.

10. YOUR CALIFORNIA PRIVACY RIGHTS

California Civil Code Section 1798.83, known as the "Shine The Light" law, permits our users who are California residents to request and obtain from us a list of what personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made only once per year and are free of charge.

11. DO NOT TRACK

We do not engage in the collection of personal information about your online activities over time and across third party websites or online services. Accordingly, we do not currently process or

comply with any web browser's "do not track" signal or other mechanisms that provide consumers with the ability to exercise choice regarding the collection of personal information about your online activities over time and across third party websites.

12. INTERNATIONAL USE

Your personal information may be stored and processed in any country where we have facilities or where we have engaged a service provider, and by your use of the Services you acknowledge that we may transfer information to countries outside of your country of residence, which may have different data protection rules than in your country.

13. CHANGES

This Privacy Statement is effective as of the date above. We reserve the right, at any time, to modify, alter, or update this statement, and any such modifications, alterations, or updates will be effective upon posting. In the event we modify this Privacy Statement, your continued use of the Services will signify your acknowledgement of the modified Privacy Statement.

14. CONTACT US:

We hope this policy answers your questions about our collection, use and disclosure of your personal information. If it does not, or if you have any questions, please contact us at:

Veterinary Growth Partners
Attn: Privacy Statement
800 W Cesar Chavez Street #B-100
Austin, TX 78701
privacy@vgpvet.com