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## External Privacy Policy

### McKesson Canada Corporation

#### Purpose

This Privacy Policy (the “**Policy**”) describes the policies of McKesson Canada Corporation (including its Canadian subsidiaries and affiliated entities, collectively, “McKesson Canada”) concerning the collection, use and disclosure of personal information by McKesson Canada.

McKesson Canada, a provider of a complete range of solutions to improve the quality, safety and cost of patient care within the Canadian health care industry, is committed to safeguarding the confidentiality, security and accuracy of personal information, including personal health information, that is collected, used, disclosed and retained by McKesson Canada.

This Policy applies across all McKesson Canada business units and may be supplemented by additional policies and procedures within McKesson Canada business units.

In this Policy, personal information and personal health information are collectively referred to as “Personal Information.”



#### Privacy Principles

The secure collection, use and disclosure of Personal Information is fundamental to McKesson Canada’s business operations and McKesson Canada strives to provide the best customer service consistent with our privacy obligations under both federal and provincial privacy laws.

McKesson’s methods for collecting, using, disclosing and retaining Personal Information will be compliant with all applicable federal and provincial laws. This includes, as applicable, the federal *Personal Information Protection and Electronic Documents Act* (“PIPEDA”), the provincial *Personal Information Protection Acts* in place in Alberta and British Columbia as well as *An Act respecting the protection of personal information in the private sector* (Québec).

McKesson Canada also complies, where applicable, with laws concerning the collection, use and disclosure of personal health information pursuant to the *E-Health (Personal Health Information Access and Protection of Privacy) Act* in British Columbia, the *Health Information Act* in Alberta, the *Personal Health Information Act* in Manitoba, the *Personal Health Information Protection Act, 2004* in Ontario, the *Personal Health*

*Information Privacy and Access Act* in New Brunswick, the *Personal Health Information Act* in Newfoundland and Labrador, and the *Personal Health Information Act* in Nova Scotia. This Policy reflects the 10 key principles/fair information practices of privacy which form part of PIPEDA and Canadian privacy laws.

The Personal Information that McKesson Canada collects will vary depending on the circumstances, but could include:

- Name, address, telephone number, email address and other contact information for members of the public who do business with McKesson Canada or who are patients for whom McKesson Canada provides services either directly or through its clients;
- Credit and other financial information for those individuals who do business with, or obtain services from, McKesson Canada;
- Insurance information for the provision of health care, or health care related services; and
- Voice recording information for individuals who contact McKesson Canada.

1. **Accountability:** McKesson Canada is responsible for Personal Information under its control. McKesson Canada is committed to observing high standards of honesty, integrity and ethical conduct in all of its operations. This includes respecting the security and privacy of Personal Information that is collected, used, disclosed and retained by McKesson Canada. This commitment is an integral part of McKesson Canada's cultural foundation and is reflected in the ICARE Principles (i.e., integrity, customer-first, accountability, respect and excellence) which guide our business interactions.

2. **Identifying Purposes:** McKesson Canada collects, uses and discloses Personal Information to:

- a. provide products and services to individuals or as required under service contracts;
- b. administer and manage McKesson Canada's operations;
- c. respond to requests for information and other inquiries from members of the public relating to McKesson Canada products and services;
- d. investigate breaches, or potential breaches, of applicable laws;
- e. comply with legal and regulatory requirements;

- f. to enforce or protect our rights;
- g. in connection with a commercial transaction including a transaction involving the sale or transfer of our business; and
- h. meet or fulfill other purposes permitted or required by law.

3. **Consent:** Except as permitted by applicable law, the knowledge and consent of the individual is required for the collection, use and disclosure of Personal Information and McKesson Canada will ensure that individuals are given an opportunity to provide informed consent at the time of collection whenever required by law and in accordance with this Policy.

4. **Limiting Collection:** McKesson Canada will limit the collection of Personal Information to that which is necessary for the purposes identified above. Information will be collected by fair and lawful means and, where appropriate, will be collected pursuant to contractual arrangements. In some cases, information will be collected from sources other than the individual, for example third parties who represent they have the right to disclose such information to McKesson Canada. Information may also be collected as required or permitted by applicable law.

**5. Limiting Use, Disclosure, and Retention:**

McKesson Canada recognizes that customers may provide sensitive information to McKesson Canada. Personal Information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Personal Information shall be retained only as long as necessary for the fulfillment of those purposes or as required by law.

McKesson Canada limits access to Personal Information by employees, contractors and agents to a “need to know” basis. Individuals who need to have access to Personal Information may do so only if such access is necessary and within the scope of that individual’s job responsibility, if contractually or otherwise required or permitted under applicable law and in accordance with this Policy.

Except under the circumstances described above, McKesson Canada employees are not authorized to access or use customers’ Personal Information.

From time to time, Personal Information collected by McKesson Canada may cross provincial or national borders (including

to the United States). That Personal Information would then be subject to legal regulation outside of the organizational restrictions put in place by McKesson Canada.

**6. Accuracy:** Personal Information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which the Personal Information was collected. McKesson Canada will update Personal Information only as and when necessary to fulfill the identified purposes or upon notification from the individual or other legally authorized representative.

Individuals wishing to update their Personal Information may make a request to McKesson Canada’s Director of Corporate Compliance by email at [compliance@mckesson.ca](mailto:compliance@mckesson.ca). McKesson Canada will comply with all applicable laws when such a request is made.

**7. Safeguards:** McKesson Canada will take appropriate physical, technical and administrative safeguards and precautions to secure Personal Information. Personal Information shall be protected by security safeguards appropriate to the sensitivity of the information and in accordance with McKesson Canada’s IT Security Policy.

Suppliers, contractors and agents working for or with McKesson Canada are contractually required to use appropriate physical, technical and administrative safeguards and precautions to secure Personal Information and must have in place privacy policies and practices, including data security policies and practices that are at least as restrictive as this Policy.

McKesson Canada employees and contractors are expected to use secure processes to maintain the integrity of company and customer information including the use of secure encryption whenever Personal Information is transmitted over public networks or is contained on portable or mobile devices used or carried outside McKesson Canada offices.

8. **Openness:** McKesson Canada will make its policies and practices surrounding the management of Personal Information, as well as the contact information of its Director of Corporate Compliance, readily available.
9. **Individual Access:** McKesson Canada will ensure there are policies and practices in place to ensure individuals can access their Personal Information upon request, subject to certain exceptions under applicable privacy laws.

Exceptions may include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal, security, or commercial proprietary reasons, and information that is subject to solicitor-client or litigation privilege.

Individuals making such a request should be aware that their right to access their Personal Information is not absolute. McKesson Canada may decline such access requests where required to do so under applicable law or regulatory requirements. It is also possible that the Personal Information may no longer exist,

or has been made anonymous, in accordance with McKesson Canada information retention practices.

10. **Challenging Compliance:** Individuals who wish to challenge McKesson Canada's compliance with these principles may address their concerns to McKesson Canada's Director of Corporate Compliance at [compliance@mckesson.ca](mailto:compliance@mckesson.ca). McKesson Canada will investigate all complaints and, if required, will take appropriate measures to resolve the complaint.



### **Related Information**

McKesson Canada Corporation is comprised of multiple business units, each of which may consist of one or more functions that are subject to this Policy. Each such business unit function must restrict the collection, use or disclosure of Personal Information to the activities or services that they perform, either for the individual from whom the information was collected, for the business unit's customers' operations, or for the business unit's own purpose. A McKesson Canada business unit may not disclose Personal Information to another function within its business unit, or to another McKesson Canada business unit in a manner that violates the permitted collection, use and disclosure of Personal Information as set out in this Policy. In all cases business units must ensure that Personal Information is securely safeguarded at all times.

Where appropriate, McKesson Canada may also have in place more detailed policies and procedures governing the collection, use and disclosure of personal information in specific parts of its businesses activities. Where such policies are in place, they will be available on the McKesson Canada website.

### **Questions and McKesson Canada Contact**

For questions about this Policy, please contact McKesson Canada's Director of Corporate Compliance at [compliance@mckesson.ca](mailto:compliance@mckesson.ca).



### **Updates to this Policy**

McKesson Canada will review this Policy periodically and will update this to address changes in applicable laws and regulations as necessary. When updates are made, an update will be posted on the McKesson Canada website. Please check our website to ensure you have the most up-to-date privacy policy.

Legal Affairs, Compliance and Ethics Office

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