

Privacy Policy

Pet 24-7 Global Ltd ("Pet 24-7 Global") is committed to protecting your privacy and ensuring you have a positive experience using our mobile application, or our website platforms and in using our products and services (collectively, "Products"). This policy covers the Pet 24-7 Global Ltd websites (equivet24-7.com & vet24-7.com), VetAssist mobile application and our Vidtu teleconference software and is applicable worldwide.

This policy outlines our handling practices and how we collect and use the Personal Data you provide during your online and offline interactions with us. As used in this Privacy Policy, "Personal Data" means any information that can be used to individually identify a person, and may include, but is not limited to: name, email address, postal or other physical address, credit or debit card number, title and other personally identifiable information. If you reside in the European Union ("EU"), United Kingdom, Lichtenstein, Norway, Iceland or Switzerland you may have additional rights with respect to your Personal Data, as further outlined below. These rights may include rights under the EU's General Data Protection Regulation ("GDPR"), if you are a resident of the EU, United Kingdom, Lichtenstein, Norway or Iceland. Pet 24-7 Global Ltd. will be the controller of your Personal Data that is provided, collected and/or processed pursuant to this Privacy Policy, except where otherwise expressly stated below. If you have any questions about whether any of foregoing applies to you, please contact us using the information set forth in the "Contact Us" section of our site. This policy may be updated from time to time for reasons such as operational practices or regulatory changes, so we recommend that you review our Privacy Policy when returning to our website.

Collection of your Personal Data

We collect the following categories of Personal Data about you when you use or otherwise interact with our Products:

- Name
- Title
- Email address
- Telephone number(s)
- Postal or other physical address
- IP addresses and other information collected passively, as further detailed in the "Passive Collection" section below.

- Device identifiers, as further described in the “Mobile Application” section below

We collect and/or process your Personal Data in connection with the below activities related to our Products:

- Account registration
- Use of certain Product features
- Generating reports based on information collected from use of our Products
- Requesting service and support for our Products and providing such support
- Placing transactions or orders
- Registering to attend a consultation, seminar or webinar
- Participating in an online survey
- Billing and collecting payments for our Products
- Participating in discussion groups or forums
- Registering for newsletter subscriptions
- Customising the advertising and content you see

Processing of your Personal Data

We will use your Personal Data only in accordance with our Privacy Policy. If you do not wish us to continue using your Personal Data in this manner, you can request that your account be deactivated by contacting us as specified in the “Contact Us” section. We will only process your Personal Data if we have a lawful basis for doing so. Lawful basis for processing include consent, contractual necessity (i.e. processing that is necessary for the performance of a contract with you, such as your user agreement with us that allows us to provide you with the Products) and our “legitimate interests” or the legitimate interest of others (e.g. our users) such as:

- Personalising, improving or operating our Products and business
- Better understanding your needs and interests
- Fulfilling requests you make related to the Products
- Providing you with information and offers from us or third parties
- Complying with our legal obligations, resolving disputes with users, enforcing our agreements
- Protecting, investigating and deterring against fraudulent, harmful, unauthorised or illegal activity
- To process your orders and deliver the Products that you have ordered
- To support recruitment inquiries

We process Personal Data for purposes such as:

- To provide reports based on information collected from use of our Products
- To keep you up to date on the latest Product announcements, software updates, software upgrades, system enhancements, special offers and other information
- To provide support and assistance for our Products
- To provide the ability to create personal profile areas and view protected content
- To provide customer feedback and support
- To the extent you choose to participate, to conduct questionnaires and surveys in order to provide better products and services to our customers and end users
- To personalise marketing communications and website content based on your preferences, such as in response to your request for specific information on products and services that may be of interest
- To contact individuals that you refer to us and identify you as the source of the referral, in accordance with the “Referral” section below
- To meet contract or legal obligations
- To process your orders and deliver the Products that you have ordered
- To provide the ability to contact you and provide you with shipping and billing information
- To support recruitment inquiries

Referrals

If you choose to use our referral service to tell a friend about our products, you represent that you have their consent to provide us your friend’s name and email address. We will automatically send your friend a one-time email inviting him or her to visit the website. Unless we are authorised by your friend, we will only use your friend’s name and email address for the purposes of sending this one-time email and maintaining an activity log of our referral program.

Choice

You can choose whether to provide Personal Data to Pet 24-7 Global but note that you may be unable to access certain options, offers and services if they require Personal Data that you have not provided. You can sign-up and therefore consent, to receive email or newsletter communications from us. If you would like to discontinue receiving these communications, you can update your preferences by using the

“Unsubscribe” link found in such emails or by contacting us using the information in the “Contact Us” section of this policy.

Data Subject Rights

You have certain rights with respect to your Personal Data as set forth below. Please note that in some circumstances, we may not be able to fully comply with your requests, or we may ask you to provide us with additional information in connection with your request, which may be Personal Data, for example, if we need to verify your identity or the nature of your request. In such situations, however, we will still respond to let you know of our decision.

To make any of the following requests, contact us using the contact details referred to in the “Contact Us” section of this policy.

- **Access:** You can request more information about the Personal Data we hold about you. You can also request a copy of the Personal Data.
- **Rectification:** If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data. You can also correct some of this information directly by logging into your account. Please contact us as soon as possible upon noticing any such inaccuracy or incompleteness.
- **Objection:** You can contact us to let us know that you object to the collection or use of your Personal Data for certain purposes.
- **Erase:** You can request that we erase some or all of your Personal Data from our systems.
- **Restriction of Processing:** You can ask us to restrict further processing of your Personal Data.
- **Portability:** You have the right to ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another entity where technically feasible.
- **Withdrawal of Consent:** If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time. Please note, however, that if you exercise this right, you may have to then provide express consent on a case-by-case basis for the use or disclosure of certain of your Personal Data, if such use or disclosure is necessary to enable you to utilise some or all of our Products.
- **Right to File Complaint:** You have the right to lodge a complaint about Pet 24-7 Global processes with respect to your Personal Data with the supervisory authority of your country or EU Member State.

Data Retention

How long we retain your Personal Data depends on the type of data and the purpose for which we process the data.

Passive Collection

Pet 24-7 Global and our third party service providers automatically collect some information about you when you use our Products, using methods such as cookies and tracking technologies (further described below). Information automatically collected includes Internet protocol (IP) addresses, browser type, Internet service provider (ISP), referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics, etc.), operating system, date/time stamp and/or clickstream data to analyse trends in the aggregate and administer the website and/or Products. In addition, when you use some of our Products, network information is transmitted back to us such as Product usage information. This information is transmitted back to us so we can determine how users are interacting with our Products, to assist us with improving our Products and to correct any problems that may occur.

Cookies and Tracking Technologies

Pet 24-7 Global and our partners use cookies or similar technologies to analyse trends, administer the websites, track users' movements around the websites and gather information about our user base, such as location information based on IP addresses. Users can control the use of cookies at the individual browser level. For more information regarding cookies or similar technologies, please review our Cookie Policy. Your browser may offer you a "Do Not Track" option, which allows you to signal to operators of websites and web applications and services (including behavioural advertising services) that you do not wish such operators to track certain of your online activities over time and across different websites. Our Products do not support Do Not Track requests at this time, which means that we collect information about your online activity both while you are using the Products and after you leave our sites.

Interest-Based Advertisements

We reserve the right to partner with third parties to either display advertising on our website or to manage our advertising on other sites. Some of our third party partners use technologies such as cookies and other technologies to gather information about your activities on this website, our affiliates' websites and unaffiliated websites in order to provide you advertising based upon your browsing activities and interests. With respect to our interest-based ads, we adhere to self-regulatory principles for online behavioural advertising issued by the Digital Advertising Alliance ("DAA") and

the European Interactive Digital Advertising Alliance (“EDAA”) (collectively, the “OBA Principles”).

More information about the OBA Principles can be found at:

<https://digitaladvertisingalliance.org/principles>

<https://www.edaa.eu/european-principles>

If you wish to not have information about your online activities over time and across different websites used for the purpose of serving you interest-based ads, you can opt-out by using the information in the “Contact Us” section of this policy. Please note that (1) this does not opt you out of being served ads and even if you opt out of interest-based ads, you will continue to receive generic ads and (2) we store your opt-out preference for interest-based ads in a cookie on your device and therefore you may have to opt out again if you delete your cookies.

Mobile Application

When you download and use our Products, we automatically collect information on the type of device you use, operating system version and the device identifier (or “UDID”). We send you push notifications from time-to-time in order to update you about any events or promotions that we may be running. If you no longer wish to receive these types of communications, you can turn them off at the device level. To ensure you receive proper notifications, we will need to collect certain information about your device such as operating system and user identification information.

Geolocation

We collect information about where you are located when you are using our Products. We use this information for purposes such as optimising your connection to our data centre and suggesting customizations to your experience with our Products (e.g. your language preference).

Sharing your Personal Data

We do not sell or rent your Personal Data to third parties for marketing purposes unless you have granted us permission to do so. We share Personal Data within Pet 24-7 Global and reserve the right to do so with affiliated companies and with third party service providers for purposes of data processing or storage. We also share Personal Data with business partners, service vendors and/or authorised third-party agents or contractors in order to provide requested Products or transactions, including processing orders, processing credit card transactions, hosting websites, hosting

event and seminar registration and providing customer support. We provide these third parties with Personal Data to complete/utilise the requested Product or transaction.

In some cases, we may choose to buy or sell assets. In these types of transactions, user information is typically one of the transferred business assets. Moreover, if we, or substantially all of our assets, were acquired, or if we go out of business or enter bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of us or our assets may continue to use your Personal Data as set forth in this policy. As required by law, we may respond to subpoenas, court orders, or similar legal process by disclosing your Personal Data and other related information, if necessary. We also may use Personal Data and other related information to establish or exercise our legal rights or defend against legal claims.

We collect and possibly share Personal Data and any other additional information available to us in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of Pet 24-7 Global's terms of service, or as otherwise required by law.

While navigating Pet 24-7 Global's website or Products, you may be directed to content or functionality that is hosted by a third-party. When information is collected on behalf of Pet 24-7 Global exclusively, Pet 24-7 Global's Privacy Policy will be referenced and will govern how your information is used. For other, non-Pet 24-7 Global's sites or services, the site/service owner's privacy policy will be referenced. You should review such third party's privacy and security policies prior to use.

Security of your Personal Data

Pet 24-7 Global is committed to protecting the Personal Data you share with us. We utilise a combination of industry-standard security technologies, procedures, and organisational measures to help protect your Personal Data from unauthorised access, use or disclosure. When we transfer credit card information over the Internet, we protect it using Secure Sockets Layer (SSL) encryption technology. We recommend you take every precaution in protecting your Personal Data when you are on the Internet. For example, change your passwords often, use a combination of letters and numbers when creating passwords and make sure you use a secure browser. If you have any questions about the security of your Personal Data, you can contact us through the contact us section of our website.

Linked websites and Third Party services

Our websites and services may provide links to other third-party websites and services which are outside our control and not covered by this policy. We encourage you to review the privacy policies posted on these (and all) sites you visit or services you use.

Newsgroups/ forums

If you participate in an open and insecure Pet 24-7 Global discussion forum or chat room, you should be aware that the information you provide there will be made broadly available to others, potentially inside or outside Pet 24-7 Global, who have access to that discussion forum or chat room. Also, please recognize that individual forums and chat rooms may have additional rules and conditions. Each participant's opinion on a forum or chat room is his or her own and should not be considered as reflecting the opinion of Pet 24-7 Global.

Pet 24-7 Global – Consultation Meeting Recordings

If you use a feature of the Products that allows for Recordings (defined below), we collect information from you that you provide in connection with such use and through such Recordings, to the extent you provide it to us. This information may include Personal Data, if you provide us with Personal Data.

For hosts – By installing or using Pet 24-7 Global software or any other Pet 24-7 Global software, tool or feature that allows for recording (each, a “Recording”), you acknowledge and agree that you and your company are responsible for (i) clearly notifying all individuals (whether or not they are Pet 24-7 Global users) who are present in a consultation meeting (whether in-person or remotely) (each, an “Participant”) for which you make a Recording that such consultation meeting might be recorded, and (ii) obtaining any consent necessary for such a recording as required by applicable laws, rules and regulations, including without limitation data privacy laws. By making a Recording of any consultation meeting using any Pet 24-7 Global Products, you and your company represent and warrant that (a) you have received legally sufficient consent from all Participants for such recording prior to starting a Recording, (b) you will only make, use, store and otherwise process such Recording in accordance with all applicable laws, rules and regulations, including data protection laws and (c) you will store and otherwise restrict access to such Recordings using appropriate technical and organisational safeguards. Any person and/or entity who makes a Recording of a meeting or webinar shall be the data controller of that Recording, and Pet 24-7 Global will be the data processor with respect to the Recording.

For Participants – Please be advised that for any consultation meetings you attend, Recordings can be enabled by a consultation meeting host. By signing up for Pet 24-7 Global services or otherwise using them in any way, including without limitation by attending any consultation meeting, you expressly acknowledge that Pet 24-7 Global may, if instructed by a meeting host, make and store Recordings for Pet 24-7 Global consultation meetings and may make such recordings available to hosts and other Participants at the direction of the host. A visual notification will be sent to Participants who connect to a consultation meeting via the Pet 24-7 Global products. If you do not want to be recorded, you can choose to leave the consultation meeting.

Transfer and Storage of Personal Data

Our Products are hosted and operated on AWS Servers through Pet 24-7 Global and its service providers. We may transfer your Personal Data to the U.S., to any Pet 24-7 Global affiliate worldwide, or to third parties acting on our behalf for the purposes of processing or storage. By using any of our Products or providing any Personal Data for any of the purposes stated above, you consent to the transfer and storage of your Personal Data, whether provided by you or obtained through a third party, to the U.S. as set forth herein, including the hosting of such Personal Data on U.S. servers.

EU-U.S. Privacy Shield and Swiss-U.S. Privacy Shield

Pet 24-7 Global participates in the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield. Pet 24-7 Global is committed to subjecting all Personal Data received from EU member countries and Switzerland, in reliance on the Privacy Shield Frameworks, to the Framework's applicable Principles. To learn more about the Privacy Shield Frameworks, visit the U.S. Department of Commerce's Privacy Shield List.

Pet 24-7 Global is responsible for the processing of Personal Data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on its behalf. Vidtu complies with the Privacy Shield Principles for all onward transfers of Personal Data from the EU and Switzerland, including the onward transfer liability provisions.

With respect to Personal Data received or transferred pursuant to the Privacy Shield Frameworks, Pet 24-7 Global is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, Pet 24-7 Global may be required to disclose Personal Data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

If you have an unresolved privacy or data use concern that we have not addressed satisfactorily, please contact our U.S.-based third party dispute resolution provider (free of charge) at <https://feedback-form.truste.com/watchdog/request>. Under certain conditions, more fully described on the Privacy Shield website, you can invoke binding arbitration when other dispute resolution procedures have been exhausted.

Standard Contractual Clauses

In certain cases, Pet 24-7 Global will transfer Personal Data from the EU in accordance with the European Commission-approved Standard Contractual Clauses, a copy of which can be obtained at <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32010D0087>

Contact Us

California Privacy Rights: Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask us for a notice identifying the categories of personal customer information which we share with our affiliates and/or third parties for marketing purposes, and providing contact information for such affiliates and/or third parties. If you are a California resident and would like a copy of this notice, please submit a written request the address below. To address your individual rights or if you have any privacy-related questions or comments related to this privacy policy, please send an email to support@pet24-7.com. You can also contact us by writing to this address:

Pet 24-7 Global Ltd.

Attention: Data Privacy Officer

Polmenna Farm House, Truro. TR2 5SR United Kingdom

If you reside in the EU, United Kingdom, Lichtenstein, Norway or Iceland, you can also contact our Data Protection Officer.