



# PRIVACY POLICY

**Effective Date: July 6, 2014**

**Version 1.7, Updated February 29, 2024**

This Privacy Policy applies to all personal information collected, used, retained and disclosed by Pillcheck, Inc. (“Pillcheck”).

The objective of this Policy is to provide an overview of our business and outline our commitment to adhere to the legislative requirements of the applicable Privacy legislation in Canada concerning the handling of our clients’ personal information. This Policy answers some of your most frequently asked questions and explains how we protect the personal information that you entrust to us.

## **About Pillcheck™**

Pillcheck is a unique service developed by GeneYouIn Inc, a Canadian personalized medicine company that puts consumers first. We believe that people have control over their genetic data and we simply assist with the understanding of their health conditions and medications. Our primary focus is to aid consumers and healthcare providers with the selection of the most effective drug therapies.

We appreciate the opportunity to provide our services to you and strive for the highest level of service excellence. An important aspect of Pillcheck’s commitment to you is respect for your right to privacy; this entails keeping your data and personal information in strict confidence.

## **Our Commitment**

### **1. Accountability**

Each and every one of our employees is responsible for maintaining and protecting the personal information to which they have access. We have strict policies and procedures in place for the protection of your personal information. There is a designated individual within Pillcheck who is responsible for monitoring our compliance.

### **2. Identifying Purpose**

[www.pillcheck.ca](http://www.pillcheck.ca)

When you access our Website, pillcheck.ca, as well as affiliated sites including pillcheck.com, (the “Website”) or become a customer of Pillcheck by signing up for an account and/or requesting one of our services (the “Services”), we will collect your personal information for the following

purposes: a) to set up and manage the Services that you have requested; b) to verify your identity and protect against fraud; c) to ensure the security and reliability of our Website; d) to prevent tampering, damage, and/or misuse of our Website; and e) to simplify your use of the secure account area.

Pillcheck is in the business of aiding consumers and healthcare providers with the identification of the most effective medications. Pillcheck enables customers to research genetic testing options by drug; we also facilitate sample collection and provide access to expert guidance by a trained pharmacist. Thus, Pillcheck will require the collection, use, retention and disclosure of certain personal information in order to facilitate and provide the Services that you have requested.

### **3. Obtain Consent**

Most personal information collected by Pillcheck is voluntarily supplied by you on our Website when you sign up and/or purchase our Services, and through the mail when you return the test vial to our partner laboratories. At this time, we will seek your consent to use and/or disclose your personal information as required in order to render the Services requested. You may, at any time, withdraw your consent; however, this will impede our ability to fulfill the requested Service. If you are only visiting our Website, we may collect some information about your computer, browser, operating system and IP address. We may also place a “cookie” on your computer in order to ease your use of the secure part of our website so that you do not need to login every time you navigate from one page to another. You will be notified if we place a “cookie” on your computer if you have “cookie notification” turned “on” in your computer system. Any “cookie” will expire upon you leaving our Website, or 30 minutes after placing it, whichever comes first.

### **4. Limit Collection**

We only collect the information we need in order to provide our Services. We will ensure that you are informed of the purposes listed above when you sign up and/or purchase any of our Services. We may collect some personal information when you visit our Website such as your IP address, and the browser and operating system that you are using. When you sign up for our newsletter email notification service, we will ask you to provide only your first name and email address. When you proceed to purchase a Pillcheck service, we will ask you to provide the following personal information: name; address; telephone number; email address; date of birth; gender; smoking status, pregnancy status; your medications; and diagnosis. You may choose *not* to provide us with certain personal information in some circumstances. However, please be aware that should you make this choice, we may not be able to provide you with the Service or information that you have requested.

We will also collect personal information from reports about you that are provided to us by genetic laboratories that conduct the DNA analysis.

## **5. Limit Use, Disclosure and Retention**

Pillcheck is committed to a high standard of confidentiality and privacy. We will only use and/or disclose your personal information for the reason(s) it was collected. This means that Pillcheck will share your personal information with you for the purpose of fulfilling the Service requested and may share specific personal information with the [third parties engaged to assist us in providing the Service](#) requested. These service providers are prohibited from using your personal information for any purpose other than to provide this assistance, and they are required to protect all personal information and comply with the general privacy principles described in this Privacy Policy. Pillcheck may use your anonymized genetic and health data for analytic and process improvement purposes.

Under no circumstances do we share your personal information with third parties without your consent, unless there is a requirement to do so by law. We do not link your IP address with your personal information unless there is reasonable cause for us to believe that some security threat and/or legal requirements are in place that require us to investigate and/or allow law enforcement to conduct some security and/or legal investigation.

Pillcheck has a policy in place that governs the retention of your personal information. We will only retain your personal information for as long as it fulfills its intended purpose, until such time that you retract your consent for us to retain your personal information, or as legally required. If at any time you decide to withdraw your consent, you may contact us at [service@pillcheck.ca](mailto:service@pillcheck.ca) to request the deletion of your health and genetic data from our records.

## **6. Be Accurate**

We are committed to maintaining the accuracy of your personal information and ensuring that it is complete and up to date. In most cases, we are collecting your personal information directly from you. If you discover inaccuracies in our data, please notify us as soon as possible so that we can make the necessary changes. It is imperative that you keep your contact information up to date so that we can provide you with relevant updates to your Results, which may change with the publication of new genetic research discoveries.

## **7. Use Appropriate Safeguards**

Your personal information is secure within Pillcheck, regardless of the format in which it is held. We have comprehensive security controls to protect against unauthorized use, access, alteration, duplication, destruction, disclosure, loss or theft of your personal information. We maintain physical, electronic and procedural safeguards to protect your personal information. Examples of safeguards include restricted access to our information processing and storage areas; limited access to relevant information by authorized employees only; use of passwords; firewall technology; double encryption of electronically transmitted information; antivirus software; and the use of physical security measures, including secure locks on filing cabinets and doors.

We are also committed to working with our clients to protect the security of personal information during any transfer of information to, or from, us. We have agreements and controls in place with third-party service providers requiring that any information provided to us be transmitted and safeguarded with the highest technological security standards in mind.

## **8. Be Open**

Pillcheck's Privacy Policy is always available on our Website at the privacy link located at the bottom of the page. Please review the commentary on implications of the [Bill S-201](#).

## **9. Give Individuals Access**

In the course of doing business with us, you are welcome to review or verify your personal information. We may need specific information from you to enable us to search for, and provide you with, the personal information we hold about you. Please note that access to your personal information is in accordance with our retention and access policy.

## **10. Provide Recourse**

Should you have any questions or concerns relating to Pillcheck's Privacy Policy, please do not hesitate to contact us at:

Chief Privacy Officer

Tel: 647-873-3836 ext.103

Email: [privacy@pillcheck.ca](mailto:privacy@pillcheck.ca)

Independent Oversight:

Office of the Privacy Commissioner of Canada



Place de Ville, Tower B, 112 Kent Street, Ottawa, Ontario, K1A 1H3  
Toll Free: 1-800-282-1376