

# **Zellers and Hbc Pharmacies Privacy Policy**

## **Introduction**

All Zellers and Hbc Pharmacies (“we”, “us”, “our”), are subject to various general Hudson’s Bay Company (“Hbc”) policies and procedures that relate to the protection of information, including personal information which, in the case of pharmacy operations, includes personal health information. The operations of all Zellers and Hbc Pharmacies are subject to this *Zellers and Hbc Pharmacies Privacy Policy* in connection with the collection, use and disclosure of personal health information. This Privacy Policy is a statement of how and why we collect, use and disclose personal health information.

Personal health information is anything that can identify an individual and which relates to their health status, care or prescription drug usage.

## **The Protection of Personal Health Information**

In our pharmacy operations we are subject to federal and provincial privacy legislation. In some provinces there are specific privacy laws that apply to the collection, use and disclosure of personal health information. In all cases, we comply with our obligations under the law, whether of general application or whether of more specific application to our role as a health services provider and custodian of personal health information. Additionally, there may be a professional code of conduct applicable to pharmacists and other pharmacy staff. Those individuals are obligated to comply with the requirements of any such code applicable to them and all employees of (and persons under contract with) a Zellers or Hbc Pharmacy, are expected to comply with the principles and practices described in this policy.

We protect the personal health information in our possession and we collect, use and disclose personal health information only for permitted and legitimate purposes.

## **Scope of this Privacy Policy**

This policy applies to the collection, use and disclosure of personal health information by Zellers and Hbc Pharmacies. It applies to the conduct of pharmacists and pharmacy staff in our pharmacies. A list of those entities to which this privacy policy applies, appears at the end of this document.

## **Why we Collect, Use and Maintain Personal Health Information**

If an individual receives pharmacy services at a Zellers or Hbc Pharmacy we will collect personal health information for one or more of the following purposes:

- dispensing and updating prescriptions and prescription renewals;
- providing additional pharmacy services such as, but not limited to, counseling and screening;
- exchanging information with the individual's other health care professionals;
- providing to the individual information that is relevant to his or her medication and treatment;
- to process, monitor or verify claims for payment or reimbursement of prescription medication and related expenses; and
- any other purposes as specifically agreed to by the individual.

## **What Information Do We Collect at Zellers/Hbc Pharmacies?**

Typically, when an individual seeks pharmacy services from a Zellers or Hbc Pharmacy, the following type of information is collected:

- Name
- Date of birth
- Address
- Phone number
- Health card & extended health plan numbers, if applicable
- Health history, if and to the extent necessary
- Prescription details
- Relevant health information such as allergies and drug sensitivities
- Any other Information necessary to the delivery of pharmacy services

We keep records about an individual's prescriptions and, where required, about any additional pharmacy services an individual may receive such as, but not limited to, counseling and screenings, as well as, health information related to the provision of pharmacy services.

## **How is Personal Health Information Collected**

Occasionally, we collect personal health information about individuals from sources other than the individual themselves, if we have obtained consent to do so or if the law permits or requires it. For example, if there is an electronic health information repository in the individual's province of residence, we might review information available in such repository for the purposes of filling prescriptions or providing advice related to a prescription.

## **When and Why Personal Health Information is Shared**

We exchange personal health information with the individual's other health services providers. We do this to the extent permitted or as required under applicable law.

When an individual provides us with their drug plan information, we do disclose personal health information in order to process, monitor or verify claims for payment or reimbursement of medication and related expenses.

## **Access to Personal Health Information we Maintain**

Under applicable law, individuals have the right to request to review and receive a copy of their personal health information. There are only some limited exceptions to these rights.

An individual may name another person to access or receive a copy of their personal health information. Individuals also have the right to request to correct any personal health information we hold that is viewed as inaccurate.

Upon request, we will correct inaccurate personal health information that is maintained in our files.

We will process access and correction requests in a timely manner and within the time allowed under applicable law.

## **Obtaining More Information or Making a Request for Access**

Any individual, or an authorized person acting on their behalf, may speak to any Pharmacist if they wish to request to review, receive a copy of, or request a correction to the personal health information held at the pharmacy about them. When an individual makes a request, we may take steps to confirm their identity and/or their authority to make a request on behalf of another person.

If an individual has any questions about the personal health information practices of Zellers or Hbc pharmacies, they may address their questions to any one of our Pharmacists at their pharmacy. Any complaints or follow up inquiries should be addressed with or by the Pharmacy Manager.

Any individual with questions, concerns or a complaint may address their inquiry to the Chief Pharmacy Privacy Officer of Zellers/Hbc Pharmacies, as follows:

Chief Pharmacy Privacy Officer (Director, Pharmacy Services)  
Zellers and Hbc Pharmacies  
8925 Torbram Road  
Brampton, Ontario  
L6T 4G1

Email: [pharmacy.privacy@hbc.com](mailto:pharmacy.privacy@hbc.com)  
Tel: 1-888-226-2225 ask for the Pharmacy Privacy Officer

If an individual's question, concern or complaint pertains to a matter that does not relate to personal health information or our related practices, they will be directed to the office of the Hbc Chief Privacy Officer.

## **Entities to Which this Privacy Policy Applies**

Pharmacies operated by the following entities are the Zellers and Hbc Pharmacies to which this Privacy Policy applies.

The Bay Pharmacy (Alta.) Limited  
The Bay Pharmacy Ltd.  
Zeller's Drug Stores (B.C.) Limited  
Zeller's Drug Stores (Alta.) Limited  
Zeller's Drug Stores (Manitoba) Limited  
Zeller's Drug Stores (N.B.) Limited  
Zeller's Drug Stores (Nova Scotia) Limited  
Zeller's Drug Stores (P.E.I.) Limited  
Zeller's Drug Stores (NFLD.) Limited  
Zeller's Drug Stores Limited  
Zellers Pharmacy Inc.

Some pharmacies are operated under the Zellers or Hbc banner by an independent pharmacist ("Licensee"). Licensees are responsible for their pharmacy operations which are conducted by the Licensee and not by us. However, we require that Licensees comply, at a minimum, with our Privacy Policy. As such, this Privacy Policy applies to Licensees, as it does to our pharmacies that are operated by the entities listed above.