

# Privacy Notice

Effective: June 30, 2024

This Privacy Policy sets forth the privacy practices for VGP Group LLC d/b/a Veterinary Growth Partners (“**VGP**,” “**we**,” or “**us**”). VGP respects your privacy and is 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](http://vgpvet.com) (the “**Website**”), EdQuest by VGP with a home page located at [edquest.vgpvet.com](http://edquest.vgpvet.com), our member-only suite of tools (e.g. coaching support), our mobile applications (the “**Apps**”), or otherwise through your interactions with us (the foregoing, together are collectively the “**Services**”).

*Please review this Privacy Policy in its entirety to understand how We collect, use and safeguard the information you may provide to us via the Services.*

*By using any of our Services, whether by visiting the Website, downloading or using an App, calling our office, and/or voluntarily providing your personal information to us through the Services, you acknowledge that you have read, understand and accept the practices contained in this Privacy Policy. This Privacy Policy may be revised from time to time, so please revisit this page often to remain fully informed of our policies. Your continued use of the Services following the posting of such changes will be deemed your acceptance of those changes.*

## 1. APPLICABILITY OF THIS PRIVACY POLICY

This Privacy Policy is subject to the agreements, including any Terms of Use, that govern your use of the Services. This Privacy Policy applies to all information collected, used or held by VGP. In addition, this Privacy Policy is applicable regardless of the means used to access or provide information through the Services (e.g., personal computer, mobile device, telephone, point of sale, or any other technology or software known today or developed in the future) and to all users of Services.

This Privacy Policy 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 create an account on the Website, you will have limited use of your account unless and until you provide certain information (e.g., billing information, contact information). 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 contact us by phone or email, or request, order, or pay for services through the Services, whether by telephone, online through an App, or via mail, we

collect your name, email address, telephone number, and address as well as other information necessary to complete your request. Further, when you order or pay for goods, and/or services through the Services, we may collect information including, but not limited to, billing and shipping addresses, financial information as applicable, your name, business name, email address, social media accounts, username, website, address and phone number.

We also collect information from you that, depending on applicable law, may not constitute personal information. This may include your business role.

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 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 optimize your use of the Services. If you want to deactivate this feature, you can deny or remove the permission for the Website or Apps 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 the 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 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 or sign-in function.

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 may use third-party advertisers 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. 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 Policy. 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, or services you request and desire;
- Processing 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 and why 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 products and services we believe are of interest to our customers; and
- Third-party analytics service providers, 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. Updates or corrections may be submitted to [privacy@vgpvvet.com](mailto:privacy@vgpvvet.com)

#### **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 Policy. 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**

Our services are not directed to children, and we do not knowingly permit children under 18 years of age to use the Services or collect information from children. By using the Services, you represent that you are 18 years of age or older. If you learn that a child has provided us with personal information, then you may contact us using the methods provided in the Contact Us section below.

#### **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 Policy 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; SALE**

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.

In the preceding twelve months we have not sold personal information. We do not sell personal information, but we recognize that the California Consumer Privacy Act of 2018 (“CCPA”) defines “personal information” in such a way that making available identifiers linked to you for a benefit may be considered a “sale.” Californians can exercise their privacy rights by contacting us at [privacy@vgpvvet.com](mailto:privacy@vgpvvet.com)

## **10. CERTAIN CONSUMER RIGHTS AND CHOICES**

To the extent provided by the law of your jurisdiction, you may (i) have the right to access certain personal information we maintain about you and request details about how we collect and process it, (ii) request certain information regarding our disclosure of personal information to third parties, (iii) request that we update or correct inaccuracies in that information, (iv) object to our use or sale of your personal information, (v) ask us to block or delete your personal information from our database, and (vi) request to download the information you have shared on the Services. You may make these requests and any other inquiries about this Privacy Policy by contacting us through the Contact Us section below. Any such requests are subject to the protection of other individuals’ rights and applicable law. Additionally, to help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal information that we maintain.

You may designate an authorized agent to make a request on your behalf pursuant to applicable law. We accept documentation of your designation in the form of a valid power of attorney and/or a written authorization signed by you and the authorized agent. You may submit evidence of your designation of an authorized agent in writing to the address provided in the Contact Us section below.

## **11. STATE-SPECIFIC PRIVACY RIGHTS**

Certain States have passed laws governing privacy rights of their residents. If you are a resident of one of the following states, please see our combined Supplemental Privacy Notice available [here](#).

- California
- Colorado
- Texas
- Utah

## **12. DO NOT TRACK**

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.

## **13. 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.

## **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:

VGP  
Attn: Privacy Statement  
211 Walter Seaholm, Suite 200

Austin, TX 78701  
[privacy@vgpvet.com](mailto:privacy@vgpvet.com)