

## Privacy Notice for Pet Owners

### 1. Organizations responsible for data processing

Below entity is associated with the MSD Animal Health brands and its websites and products. They are operated by **MSD Animal Health FZ LLC**, which serves as the legal entity and data controller.

#### **MSD Animal Health FZ LLC**

Office A107, Level 1 – Wing A, Innovation Hub Building 2, Dubai Internet City, Dubai, UAE  
(hereinafter “**MSD**” or “**We**”)

This Privacy Notice describes how we process the personal data of Animal Pet Owners including pet owners, and other consumers (individuals accessing the Sure PetCare or Home Again websites or using our products and services for personal needs) (hereinafter “**Pet Owners**” or “**You**”), how we use personal data, and any rights you have regarding your personal data.

### 2. Personal data processed by us

Personal data is any information relating to you that we collect in connection with any interactions with you and your communication with us. We may also process personal data that you provide to us or that results from your use of our websites or online services and those of our partners. We receive personal data from companies that provide information in the healthcare sector, sources of information open to the public, and business partners. Depending on the purpose of the data processing, we process the following personal data:

- Last name, first name
- Contact details (such as mailing/billing/shipping address, telephone numbers, email address, country, social media usernames (if applicable))
- Login data
- Purchase information (product(s) purchased, date of purchase, payment details (to the extent they are not held by the third-party payment services provider), communication preferences and any other personal data you provide related to your purchase/query
- Previous pet owners and their contact details and alternative contacts
- Navigation data on our websites, applications or online services or those of our partners (see our [Global Internet Privacy Policy](#) and our [Global Online Tracking Policy](#) cookies (see our Cookie Preference Center in this regard, which can be found at the bottom of our website by clicking on the “Cookie Preferences” button)
- Other information such as information about your pet (microchip identification number, name, date of birth, species, breed, colour, type of food, weight, medical conditions)

If MSD asks you to provide your personal data, you have the right to decline. If you decline to provide data required by us to either comply with legal obligations or to provide you with a requested service or to perform contractual obligations, we will not be able to provide those services or enter into a contract with you. If that is the case, we will inform you accordingly.

### 3. Purpose of processing

We can only process your personal information where we have a suitable legal basis under the applicable data protection laws. Please see below a list of our business processes with the associated legal basis:

Fulfilment of our legitimate interest:

- Maintaining a pet registration database, providing support and facilitating the relocation of lost pets

- Providing you with information about other products and services we offer that are like those that you have already been provided with or enquired about
- Responding to your queries and providing customer support services when you contact us by phone, email, live chat, chatbot, or via our social media channels
- Providing you with a better user experience and improving the performance of our website(s), making our website more secure and to administer our website, as well as for internal operations, including troubleshooting, data analytics, identity verification checks and testing
- Satisfaction surveys, tracking of interest in the provided information, business analytics and other key account management activities
- Providing personal data in relation to a merger, acquisition, insolvency, or other business transaction
- Consolidation and controlling of the finances of the MSD group companies
- Security monitoring, fraud prevention, and incident response

Fulfilment of our legal obligations:

- Holding personal data if we are legally required to keep information on to you to fulfil our legal obligations

Fulfilment of our contractual obligations:

- Account creation and access control for our websites, ecommerce websites and applications
- Order management and fulfilment for product supply via our websites or ecommerce sites
- Registering your product warranty with us

Based on your consent:

- Sending marketing communications including promotional offers to you from us or third parties where you have accepted or consented to receive such offers and information in line with your interests and preferences. You have the right to withdraw this consent at any time by selecting the “unsubscribe” link shown in every marketing communication you receive from us
- Market research
- Personalization and profiling
- Consent based testimonials or case studies featuring you
- Tracking in our websites for non-essential cookies

#### **4. Sharing personal data with Third parties**

Depending on the purpose for which your personal data is processed, your personal data may be shared with the following categories of recipients:

- With MSD group companies in the United Kingdom, Switzerland, and the EU, as well as with the parent company Merck & Co, Inc., Rahway, NJ, USA and within the corporate group across different countries and regions
- With business partners, suppliers and sub-contractors: to help us fulfil your order, process payment, provide specialized services such as customer service, marketing, advertising, data processing and other services related to improving and optimizing the website and our service/product, animal shelters, veterinary clinics, and animal welfare organizations that provide care until the lost pet is returned and to assess fraud, credit and/or security risks
- With authorities, courts, and administrative or regulatory bodies: to comply with applicable legislation, a court order or legal process

- With other third parties as necessary: for purposes such as to protect and defend our (or our licensor's) rights or property, prevent fraud or violations of our Terms of Use, and ensure the personal safety of other users of the website (or the public at large)
- With potential purchasers or investors: in the event that we sell, assign or transfer some or all of our business or assets to a successor or acquirer, or if we are acquired by or merge with a third party, or if we file for bankruptcy or becomes insolvent, we may disclose, sell, assign or transfer all of your personal data as part of the transaction

## 5. Security and retention period of personal data

MSD has implemented appropriate technical and organizational measures, including security policies, rules and technical measures to protect and safeguard your personal data under its control from unauthorized access, improper use or disclosure, unauthorized modification, unlawful destruction or accidental loss. We may use third party vendors and hosting partners to provide the necessary hardware, software, networking, storage, and related technology required to securely provide our products and services. Our Company employees and data processors that have access to and are associated with the processing of your personal data, are obliged to respect the confidentiality of your personal data.

MSD will retain your personal data for as long as is necessary for the purposes described. This often means that we will keep your personal data for the duration of your account or engagement with you and will be terminated in accordance with the agreement. Please note, however, that where applicable legislation requires us to do so, it will be required to keep records of your personal data even after such termination during the term established by applicable law. As a rule, pet registrations with owner details will be retained in our database for 3 years, personal data in relation to a purchase, will be retained for a period of 7 years so that we can comply and assist with any accounting questions that may arise and other data, including commercial and marketing data will not be retained for longer than 10 years. Where we process personal data for any other reason (such as where you have contacted us with a question in connection with the website) we will retain your data for 2 years.

In some circumstances, we may anonymize your data so that it can no longer be associated with you for research or statistical purposes, in which case we may use this information indefinitely.

## 6. Disclosure of personal data abroad

Your personal data may be disclosed as needed to MSD entities and third parties located in the United States and other countries outside of the European Union (EU) or European Economic Area (EEA), including in countries that may not provide the same level of data protection as your home country. Where transfers occur, our company has implemented appropriate security and compliance mechanisms to ensure your personal data is protected as required and your rights are respected, such as Global Cross-Border Privacy Rules certification, Binding Corporate Rules (BCR), EU-U.S. Data Privacy Framework (DPF) program, the UK Extension to DPF and the Swiss-U.S. Data Privacy Framework program or approved data protection contractual clauses. Additionally, the recipients of your personal information are bound to duties of confidentiality through legally binding framework.

More information on these measures is described in our [Global Cross Border Privacy Rules Policy](#) and your rights provided by these can be obtained by contacting the [Gulf & Levant Privacy Office](#).

## 7. Your rights as a data subject

In accordance with the provisions of the appropriate local data protection regulation and subject to the conditions provided for in these provisions for exercising these rights, you have a right to access or correct information, to object to or request the restriction of processing of your personal information, and to request erasure and portability of your own personal information.

If you wish to exercise these rights, you can use the you can use the data privacy request form that can be found on our [Local Privacy Website](#).

Alternatively, you may submit your request by email to the [Gulf & Levant Privacy Office](#) to the attention of the Local Privacy Office. If necessary, you may also use the unsubscribe links in our communication with you.

You also have the right to file a complaint with the relevant authority depending upon where you are based, or where your medical information is sourced from.

To find more information about our data protection practices, please visit [www.msdprivacy.com](http://www.msdprivacy.com).

We may update this Privacy Notice periodically in response to changing laws, regulations, and industry practices. We reserve the right to modify, add or remove portions of this Notice at our discretion. If we decide to change this Notice, we will post the updated version on [Gulf & Levant AH Corporate Website](#). If the changes are material, we will post the changes prior to the effective date of the change.