

CLIENT PRIVACY POLICY

Effective: December 17, 2018

1. OVERVIEW

This privacy policy (“**Privacy Policy**”) sets out the privacy policies and practices for Peace Naturals Project Inc. and its affiliates (collectively, “**Peace Naturals**”, “**We**”, “**Us**” or “**Our**”) with respect to the collection, use and disclosure of client Personal Information (defined below). There is a Privacy Statement and Terms and Conditions that are specific to the use of our website, www.PeaceNaturals.com (the “**Website**”), and which can be found on the Website.

Please carefully read this Privacy Policy to learn more about how we collect, use, disclose and store the information you provide us and the steps we take to help protect such information from unauthorized use or disclosure. When you become a client of Peace Naturals, you consent to the collection, processing and retention of your Personal Information as described in this Privacy Policy.

You can refuse to consent to our collection, use or disclosure of your Personal Information, or withdraw your consent to our further collection, use or disclosure of Personal Information at any time by giving us reasonable notice provided your refusal or withdrawal of consent does not limit our ability to provide our services, to comply with applicable law with respect to the Personal Information in our possession or limit any rights we have under any documents that you have executed and/or delivered to Peace Naturals. In certain cases, your refusal to consent could prohibit your eligibility as a client of Peace Naturals.

Peace Naturals may process Personal Information in global databases that can be accessed by authorized Peace Naturals personnel worldwide. Personal Information stored outside of Canada may be subject to access by law enforcement agencies or other third parties under applicable local laws.

2. COLLECTION OF PERSONAL INFORMATION

“**Personal Information**” is any information about an identifiable individual.

Peace Naturals collects Personal Information directly from our clients, their authorized representatives, and their healthcare practitioners. We collect Personal Information from you when you register for a client account, place an order, subscribe to our communications, respond to a survey or enter information on the Website.

Personal Information we collect includes:

- (a) Your given name, surname, email address, telephone number, residential address, mailing address, and other contact information;
- (b) Your gender, date of birth, daily dosage, primary symptoms/conditions, and other information set out on your medical document and registration materials;
- (c) The given name, surname, profession and address of the health care practitioner who issued a medical document on your behalf;
- (d) If applicable, the consent of the health care practitioner to receive shipments on your behalf;
- (e) If applicable, the given name, surname, date of birth and gender of one or more persons who are responsible for you, as well as contact information for such persons;
- (f) Credit card or other payment information, where you purchase a product or service from Peace Naturals;

- (g) Ordering and shipping information, including order details about products sold or provided under the *Cannabis Act* (Canada) (the “**Cannabis Act**”);
- (h) Information about your preferences and feedback on our products and services;
- (i) Demographic and profile data; and
- (j) Such other information we may collect with your consent or as permitted or required by law or regulation.

3. USE OF PERSONAL INFORMATION

Peace Naturals generally uses Personal Information for the following purposes:

- (a) Meeting legal and regulatory requirements, including as follows:
 - (i) When registration materials are submitted to Peace Naturals, Peace Naturals will use this information to verify an individual’s eligibility for registration under the Cannabis Act; and
 - (ii) Peace Naturals will periodically use an individual’s ordering and shipping information to verify that orders are being fulfilled and tracked in compliance with the Cannabis Act.
- (b) As is reasonably required to provide the requested services, products, or information, including as follows:
 - (i) When you place an order, Peace Naturals will use your profile and historical purchase data to assist with the transaction;
 - (ii) When you purchase a product or service from Peace Naturals, Peace Naturals will use credit card or other payment information as reasonably necessary to process the transaction, and will use your contact information as reasonably necessary to deliver the products or services; and
 - (iii) Peace Naturals will use your account information to audit the integrity of its data.
- (c) Managing, administering, collecting or otherwise enforcing accounts;
- (d) Maintaining business records for reasonable periods, and generally managing and administering our business including defending and bringing legal actions;
- (e) Meeting insurance, security and processing requirements;
- (f) Analyzing, developing and improving its product services and offerings;
- (g) If you choose this option, providing updates, alerts, news, promotions, bulletins, or other similar communications about our products we think you may be interested in;
- (h) Tailoring your experience on the Website and to display the Website content according to your preferences; and
- (i) Otherwise with your consent or as permitted by law.

Peace Naturals may use Personal Information for additional purposes that may be identified at or before the time that the information is collected, or as required by law. Peace Naturals will retain the Personal Information only as long as necessary for the purposes outlined in this Privacy Policy or as required or permitted by law.

4. DISCLOSURE OF PERSONAL INFORMATION

Peace Naturals discloses Personal Information in the following circumstances:

- (a) Peace Naturals may be required under the Cannabis Act and other applicable legislation to disclose your prescribing, registration, ordering, and shipment information to law enforcement personnel, provincial medical licensing bodies, and other regulatory or governmental bodies, including as follows:
 - (i) Peace Naturals is required to provide information regarding the prescribing activity of healthcare practitioners to provincial medical licensing bodies, along with information relating to orders and shipments generated on the basis of such prescriptions; and
 - (ii) Peace Naturals is required to provide information regarding ordering and shipment activities to Health Canada inspectors during inspections; Peace Naturals is required to respond to lawful access requests from law enforcement personnel regarding clients and caregivers.
- (b) Peace Naturals may disclose information regarding your registration status to your clinic and healthcare practitioner(s) to perform verifications required under the Cannabis Act;
- (c) Peace Naturals may disclose your registration status and account history to your health care practitioner or clinic in order to ensure patient safety, appropriate treatment, and continuity of care, and to perform verifications required under the Cannabis Act;
- (d) If your clinic or healthcare practitioner utilizes a technology platform to facilitate your registration with Peace Naturals, Peace Naturals may be required to share information regarding your registration and account status with the platform provider as necessary to fulfill reporting requirements under Peace Naturals' service agreement with the platform provider; and
- (e) If you direct Peace Naturals to transfer your Personal Information, including your medical document and registration material(s), to another licensed producer under the Cannabis Act because you no longer wish to be a client of Peace Naturals; provided that you acknowledge that, from and after the date such information is transferred, Peace Naturals takes no responsibility for the collection, use and disclosure of your Personal Information by such other licensed producer or any other third party, but will continue to fulfill its obligations under applicable law with respect to any copies of your Personal Information that Peace Naturals retains in its possession.

Peace Naturals may transfer Personal Information to outside agents or service providers, including affiliates of Peace Naturals acting in this capacity, that perform services on our behalf, for example information technology services, data hosting/processing services, or similar services, or otherwise to collect, use, disclose, store or process Personal Information on our behalf for the purposes described in this Privacy Policy. Some of these service providers or affiliates may be located outside of Canada, including in the United States, and your Personal Information may be collected, used, disclosed, stored and processed in the United States or elsewhere outside of Canada for the purposes described in this Privacy Policy. Reasonable contractual other measures we may take to protect your Personal Information while processed or handled by these service providers are subject to legal requirements in Canada, the United States and other foreign countries applicable to our affiliates, agents and service providers, for example lawful requirements to disclose personal information to government authorities in those countries.

In addition to the above, Personal Information may be disclosed to our affiliates for internal audit, management, billing, or administrative purposes including defending and bringing legal actions. Peace Naturals may also disclose Personal Information to:

- (a) Law enforcement agencies for the purposes of investigating fraud or other offences, in connection with the prevention or investigation of suspected fraudulent activities or harm to individuals or property, to establish or exercise our legal rights or defend against legal claims, or in connection with an emergency that warrants use or disclosure of the information;
- (b) Third party insurers, for billing and administrative purposes;
- (c) Legal, financial, insurance, and other advisors or service providers in connection with the sale, reorganization, or management of all or part of its business or operations; and
- (d) Fulfill any other purposes that are identified when the Personal Information is collected.

5. ACCESS TO YOUR PERSONAL INFORMATION

You may request access to, or correction of, any of your Personal Information in our control. Summary Personal Information is available on reasonable notice. More detailed requests which require retrieval costs may be subject to reasonable costs.

Your rights to access your Personal Information are not absolute. We may deny you access to your Personal Information when:

- (a) It is required or authorized by law, including when a record containing your Personal Information is protected by solicitor-client privilege;
- (b) To do so would reveal confidential commercial information and the Personal Information cannot be severed from the record;
- (c) To do so could reasonably be expected to threaten the life or security of another individual and the Personal Information cannot be severed from the record; or
- (d) The Personal Information was generated in the course of a formal dispute resolution process.

If we deny your request for access to your Personal Information, we will explain the reason for such denial.

6. SECURITY OF YOUR PERSONAL INFORMATION

We take reasonable precautions to ensure that your Personal Information is kept safe from loss, theft, unauthorized access, disclosure, copying, use or modification using physical, organizational, and technological security measures that are appropriate having regard to the sensitivity of the information. The security of information transmitted through the internet cannot, however, be guaranteed. We are not responsible for any interception or interruption of any communications or for changes to or losses of data through the internet. You are responsible for maintaining the security of any password, user ID or other form of authentication involved in obtaining access to password protected or secure areas of the Website. Any access to the Website through your user ID and password will be treated as authorized by you.

The file containing your Personal Information will be maintained in Peace Naturals' servers or those of its service providers. Peace Naturals' employees, representatives or agents will have access to your Personal Information as necessary in connection with their role.



7. THIRD PARTY LINKS

Occasionally, at our discretion, we may include or offer third party products or services on our Website. These third party websites may have separate and independent privacy policies. We therefore have no responsibility or liability with respect to these linked sites or their handling of your Personal Information.

8. OPT-OUT

If, upon registering as a client with Peace Naturals, you opted to receive electronic messages containing news, updates and promotions from Peace Naturals regarding its products and activities, but no longer wish to receive such messages, you may opt out of receiving further communications by using the unsubscribe link in those email messages or sending an email to clientcare@peacenaturals.com.

9. CHANGES TO THIS PRIVACY POLICY

Peace Naturals reserves the right to change the terms of this Privacy Policy. If we make any material changes to this Privacy Policy, we will notify you in advance. Your continued use of the services after the Effective Date constitutes your acceptance of the Privacy Policy.

10. QUESTIONS

If you have any questions with respect to this Privacy Policy or your rights hereunder, or if you would like to request access to or correction of your Personal Information, please send an email to privacy@thecronosgroup.com.