

## Privacy Policy

Last updated February 2018

This Privacy Policy sets out the privacy policies and practices for United Greeneries Ltd. d/b/a United Greeneries (“United Greeneries”) with respect to United Greeneries’ collection, use, and disclosure of personal information through its website United Greeneries.ca (the “Site”) and any other channel.

In this Privacy Policy, “personal information” means any information about an identifiable individual, as further defined under applicable Canadian laws.

United Greeneries may update this Privacy Policy from time to time.

### Collection of Personal Information

United Greeneries and its agents and representatives collect personal information from patients, caregivers, healthcare practitioners, and others (an “Individual”) when an Individual registers for services, purchases products, or shares information through the Site or any other channel, and may from time to time collect additional personal information in the course of providing such products and services. Personal information we collect includes:

- An Individual’s given name, surname, address, telephone number, residential address, mailing address, and other contact information;
- An Individual’s gender, date of birth, daily dosage, primary symptoms/conditions, and other information set out on an Individual’s medical document and registration materials;
- The given name, surname, profession and address of the health care practitioner who issued a medical document on behalf of an Individual;
- If applicable, the consent of the health care practitioner to receive shipments on the Individual’s behalf
- If applicable, the given name, surname, date of birth and gender of one or more persons who are responsible for the Individual, as well as contact information for such persons;
- Credit card or other payment information, where an Individual purchases a product or service from United Greeneries;
- Ordering and shipping information, including order details about products sold or provided under the *Access to Cannabis for Medical Purposes Regulations* (“ACMPR”);
- Information about an Individual’s preferences and feedback on our products and services,
- Demographic and profile data;

- Such other information we may collect with your consent or as permitted or required by law or regulation.

## **Use of Personal Information**

United Greeneries generally uses personal information for the following purposes:

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

From time to time, United Greeneries may offer interactive services which allow the Individual to share information with other users of the Site, such as message boards, user reviews, or other similar functions. These features may permit the Individual to publish personal information about him or herself, or about another individual. By

submitting such information, the Individual represents: (a) that the Individual consents to its collection, retention, and public disclosure on the Site; and (b) that the Individual has obtained the same consent from any other individuals, as applicable.

United Greeneries 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. United Greeneries 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.

### **Disclosure of Personal Information**

United Greeneries discloses personal information in the following circumstances:

- United Greeneries may be required under the ACMPR and other applicable legislation to disclose an Individual's prescribing, registration, ordering, and shipment information to law enforcement personnel, provincial medical licensing bodies, and other regulatory or governmental bodies, including as follows:
  - United Greeneries 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;
  - United Greeneries is required to provide information regarding ordering and shipment activities to Health Canada inspectors during inspections; United Greeneries is required to respond to lawful access requests from law enforcement personnel regarding clients and caregivers.
- United Greeneries may disclose information regarding an Individual's registration status to that Individual's clinic and healthcare practitioner(s) to perform verifications required under the ACMPR;
- United Greeneries may disclose an Individual's registration status and account history to an Individual's health care practitioner or clinic in order to ensure patient safety, appropriate treatment, and continuity of care, and to perform verifications required under the ACMPR;
- If an Individual's clinic or healthcare practitioner utilizes a technology platform to facilitate an Individual's registration with United Greeneries, United Greeneries may be required to share information regarding the Individual's registration and account status with the platform provider as necessary to fulfill reporting requirements under United Greeneries' service agreement with the platform provider.

In addition to the above, personal information may be disclosed to our affiliates (including outside of Canada) for internal audit, management, billing, or administrative purposes including defending and bringing legal actions. United Greeneries may also disclose personal information:

- to 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;
- to third party insurers, for billing and administrative purposes;
- to legal, financial, insurance, and other advisors in connection with the sale, reorganization, or management of all or part of its business or operations;
- as consented to by an Individual from time to time, including to fulfill any other purposes that are identified when the personal information is collected.

United Greeneries will not use or disclose personal information for purposes other than those for which it was collected, except with an Individual's consent or as required or permitted by law. Consent may be express or implied, and given in writing by using or not using a check-off box, electronically, orally, or by the Individual's conduct, such as purchase or use of the services or products.

### **Use or Disclosure for Research Purposes**

In order to improve its processes, products and service offerings, United Greeneries may from time to time make use of aggregated and non-identifying information ("Aggregated Data") for research purposes, such as to better understand the needs and wants of its customers and users. United Greeneries may disclose such Aggregated Data, which will not personally identify any Individual, to its affiliates, agents, service providers and business partners for these purposes.

From time to time, United Greeneries may request an Individual's consent to use or disclose personal information about the Individual for research purposes, including in relation to the Individual's use of cannabis for medical purposes. For example, United Greeneries may invite an Individual to complete a survey or to participate in a study, which may be conducted by United Greeneries or by a third party. United Greeneries will not use or disclose an Individual's personal information for such research purposes without the Individual's express consent, which may be withheld or denied without consequence to the use of any unrelated function of the Site, including access to any other products or services offered.

### **Storage and Processing Outside of Canada**

United Greeneries may transfer personal information to outside agents or service providers, including affiliates of United Greeneries 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.

Any questions in this regard may be directed to United Greeneries' Privacy Officer (the "Privacy Officer") using the contact information provided below.

### **Cookies and IP Addresses**

United Greeneries uses an Individual's IP address to help identify an Individual, gather broad demographic information about users of the Site, diagnose problems with United Greeneries's systems, and administer the Sites. Depending on a user's browser settings, the Site may use cookies (a small text file that is stored on a user's computer for record-keeping purposes) to deliver content according to the Individual's preferences and to save the Individual's password so that the Individual is not required to re-enter it while the Individual uses the Site.

### **Third Party Advertising / Analytics**

We may partner with third party advertising services to present you with advertising on third party Web sites based on your previous interaction with the Site. The techniques our partners employ do not directly collect personal information, but could be used to collect identifiable information about your online activities over time and across different Web sites, including when you use the Site.

### **Security**

The file containing Individual personal information will be maintained in United Greeneries' servers or those of its service providers. United Greeneries' employees, representatives or agents will have access to an Individual's personal information as necessary in connection with their role. United Greeneries protects against the loss, misuse, and alteration of personal information with security measures appropriate to the sensitivity of the information, including through the use of physical, organizational, and technological measures and appropriate training of employees.

### **Opt-Out**

An Individual may opt out of receiving further communications by using the unsubscribe mechanism at the bottom of our email communications or by contacting the Privacy Officer using the contact information provided below. Any such opt-out will not apply to any communications that are required by law, such as to comply with obligations under the ACMPR.

## **Access and Corrections**

An Individual may contact the Privacy Officer, using the contact information provided below, to modify or correct any of his or her personal information that is under United Greeneries' control, or to request access to that information. An Individual may also direct a written complaint regarding compliance with this Privacy Policy to the Privacy Officer and, within a reasonable time upon receiving the written complaint, the Privacy Officer will conduct an investigation into the matter. Within a reasonable time of concluding the investigation, the Privacy Officer will respond to the complaint and, if appropriate, United Greeneries will take appropriate measures necessary to rectify the source of the complaint.

## **Contact**

If an Individual has any questions about this Privacy Policy or United Greeneries' collection, use, disclosure, or retention of the Individual's personal information, please contact the Privacy Officer as follows:

United Greeneries

Attention: Privacy Officer

Address: United Greeneries Ltd., PO Box 21090, Duncan, BC V9L 0C2

Email: [customerservice@unitedgreeneries.ca](mailto:customerservice@unitedgreeneries.ca)

Fax: 1-250-984-0769