



PRIVACY POLICY

1. PURPOSE

This Privacy Policy has been prepared by Fleur de Leaf Cannabis Corporation and its subsidiaries (collectively, the “Company”). This Privacy Policy sets out the manner in which the Company collects, uses, discloses and otherwise manages personal information.

2. SCOPE

This Privacy Policy applies to all employees of the Company, anyone that utilizes any of the services provided by the Company, in email, text, and other electronic messages between you and this Website, and anyone that accesses the website operated by the Company at <https://www.fleurdeleaf.net/>, (the “Website”).

It is the Company’s policy to comply with the privacy legislation within each jurisdiction in which we operate. Sometimes such legislation and/or an individual’s right to privacy are different from one jurisdiction to another. This Privacy Policy covers only those activities that are subject to the provisions of Canada’s federal and provincial privacy laws, as applicable.

This Privacy Policy has a limited scope and application. Consequently, the rights and obligations contained in this Privacy Policy may not be available to all individuals or in all jurisdictions.

The Website may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third parties have their own privacy policies and we do not accept any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

3. WHAT IS PERSONAL INFORMATION OR PERSONAL DATA?

Personal information is any information about an identifiable individual (“Personal Information”). The Company recognizes the sensitivity of Personal Information, and that Personal Information should only be collected, used, disclosed, and retained for legitimate purposes and must be handled with care and respect. In doing so, we are committed to protecting your right to have your Personal Information collected, used and disclosed transparently and responsibly.

We may use or disclose your collected personal information without your knowledge or further consent in limited circumstances where we are required to do so by law. In certain limited circumstances, we may be required to release your personal information in response to a court order, subpoena, search warrant, law or regulation. We will cooperate in responding to such requests, taking appropriate measures to ensure that the requester understands the sensitive nature of the personal information they may receive.

4. HOW DO WE OBTAIN YOUR CONSENT TO COLLECT YOUR PERSONAL INFORMATION?

By using the Websites or by otherwise providing personal information to the Company, you agree to this Privacy Policy and that we may collect, use and disclose your personal information in accordance with it.

You may withdraw your consent at any time in writing. To do so, please contact our Privacy Officer to find out how to withdraw your consent. We will obtain your consent before collecting, using or disclosing your personal information for new purposes unrelated to the purposes described in this Privacy Policy.

Typically, we will seek your consent at the time we collect your personal information. Your consent may be implied, deemed (using an opt-out mechanism) or express. Implied consent can be reasonably inferred from your action (e.g. entering into an agreement with us or providing payment) or inaction. Express consent can be given orally, electronically or in writing.

The Company will most often collect personal information directly from you. In cases where personal information is held by a third party, we will obtain your consent before seeking this information. In some cases, consent may be implied by your actions. Where we obtain your personal information directly from a third party, we will take reasonable steps to ensure that the third party has represented to us that it has the right to disclose your personal information to us.

Personal data collected on this website may also be combined with information you provide us through other sources such as other Company websites, product registration, call centres, or in conjunction with events such as trade shows, training seminars and conferences. Information that you supply will relate to the relationship that the Company has with you or your organization.

5. WHAT PERSONAL INFORMATION DO WE COLLECT?

The Company only collects the amount and type of Personal Information that is necessary for the purposes for which the Personal Information is collected. What follows is the type of Personal Information that we may collect, depending on your relationship with the Company and how you use our services.

Visit our Websites: In order to access our Website, we require you to enter your date of birth and jurisdiction of residence to verify that you are the age of majority in your jurisdiction of residence in order to meet regulatory requirements.

We may collect information related to your visit to our Website, including browsing history, time on the Website, Website pages visited, entry pages to the Website,

and exit pages from the Website. We use this information to monitor our Websites' performance (such as number of visits, average time spent, page views) and for our business purposes such as: (i) improving our products and services; and (ii) upgrading our Website.

We may place a "cookie" on the hard drive of your computer to track your visit. A cookie is a small data file that is transferred to your hard drive through your web browser that can only be read by the website that placed the cookie on your hard drive. The cookie acts as an identification card and allows our Website to identify you for the purposes of the age gate, WordPress platform, and Google Analytics used on the Website. No personal information is collected via the cookie. Most web browsers are set to accept cookies. However, on most web browsers you may change this setting to have your web browser either: (i) notify you prior to a website placing a cookie on your hard drive so that you can decide whether or not to accept the cookie; or (ii) automatically prevent the placing of a cookie on your hard drive. It should be noted that if cookies are not accepted, you may not be able to access a number of web pages found on our websites.

Marketing Communications: You may sign-up to receive email marketing communications such as newsletters and special offers on products and services by providing us with your name and email address. You can unsubscribe at any time by clicking the "unsubscribe" link included at the bottom of each email and following the instructions. Alternatively, you can opt-out of receiving email marketing communications by contacting us at the contact information provided in the "Contact Us" section of the Website. Please note that you may continue to receive transactional or account-related communications from us.

Careers: If you apply for a job with The Company, you may provide us with certain Personal Information about yourself, such as information contained in a resume, cover letter, or similar employment-related materials. We use this information for the purpose of processing and responding to your application for current and future career opportunities.

Contact Us: When you contact us with a comment, question or complaint through live chat, email, telephone, or the contact us form on our Websites, you may be asked for information that identifies you, such as your name, email address and a telephone number, along with additional information we need to help us promptly answer your question or respond to your comment. We may retain this information to assist you in the future and to improve our customer service and service offerings.

6. HOW DO WE USE YOUR PERSONAL INFORMATION?

We collect your Personal Information to operate, maintain, enhance and provide all features of the Company's services, comply with regulatory requirements, send you marketing communications, respond to comments and questions, and provide support to users of the Company's services. We use information collected from cookies and other technologies to improve your experience and the overall quality of our services and website.

You will be notified of one or more specific purposes of collection when you are prompted to provide your Personal Information, and will be asked for your consent to the collection and use of your Personal Information for those purposes.

If your Personal Information is to be utilized for any purpose besides that outlined at the time of collection, you will be notified of that new purpose and asked for consent prior to the Company using your Personal Information for that new purpose, except as otherwise permitted by the applicable legislation and this Privacy Policy.

The Company may use Personal Information collected to:

- confirm the individual's registration status and to maintain the individual's account;
- fill orders made online and provide other information requested by you;
- establish, maintain and manage our relationship with you so we can provide you with products and services as requested and in line with your needs and preferences;
- provide you with information about our products and services, including the latest news on Company activities and initiatives, information about new products and services, product updates, technical support issues, events and special offers;
- recommend products, services or programs on our Website by providing customized content on our Website or otherwise;
- obtain and process payments, which includes providing necessary information to our third party service providers (please see Third Party Service Providers section below);
- enable us to comply with applicable laws and specifically the requirements of the federal Cannabis Act and Regulations;
- to protect the Company against error, fraud, theft and damage to our goods and property; and,
- any other reasonable purpose to which you consent.

At the time of collection, the Company will document the purposes for which the information was collected. Upon request, the Company will explain the purposes for which the information is being collected.

7. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect information in the following ways:

a. Information you give us: Some of our services require you to sign up for an account. When you do, we will ask for Personal Information, including your name, birth date, email address, phone number and other applicable information to create your account. Some of our services will also require you to provide us with your Personal Information in order to obtain a product or receive information from us, such as newsletters or other email messages containing information of a commercial or promotional nature.

b. Cookies and similar technologies: The Company uses cookies or other tracking tools to provide services required by the user, if consented to by the user.

c. Google Analytics: Google Analytics is a web analysis service provided by Google Inc. (“Google”) that is used on the Website. Google utilizes the data collected to track and examine the use of the Website, to prepare reports on the Website’s activities and to provide the Company with other services related to Website and Internet use. Google may use the data collected to contextualize and personalize the advertisements of its own advertising network. Google Analytics processes information in the USA. The Personal Information collected by Google includes cookies and usage data. We encourage you to review the Privacy Policy for Google Analytics if you would like any further details regarding how they process Personal Information.

8. WHO HAS ACCESS TO YOUR PERSONAL INFORMATION WITHIN THE COMPANY?

Only those employees and contracted individuals of the Company who require access for business reasons or whose duties reasonably so require shall be granted access to Personal Information about users.

9. DISCLOSURE OF YOUR PERSONAL INFORMATION OUTSIDE OF THE COMPANY

The Company may disclose your Personal Information with third party companies, organizations and individuals outside of the Company if:

a. You have provided your consent: We will share Personal Information with companies, organizations or individuals outside of the Company when we have your consent to do so.

b. For external data processing: We may provide Personal Information to certain third party agents or service providers to process for us, in order to carry out the requested services, comply with inventory tracking for regulatory purposes or as necessary for otherwise lawfully processing Personal Information. For example, the Company may share your Personal Information with payment processors so that these payment processors can provide services on our behalf.

c. To comply with a legal obligation: The Company may disclose Personal Information if required to do so pursuant to any applicable law, regulation, legal process or enforceable governmental request. For example, it may be necessary for the Company to disclose Personal Information to law enforcement officials, regulatory bodies, or government agencies for the purposes of investigating or preventing drug, fraud, or other offences as may be required or permitted by applicable laws. Additionally, under applicable laws, the Company may be required to disclose some of a user’s Personal Information to government officials, law enforcement personnel, or competent authorities of foreign governments.

d. For Legal Reasons: The Company may also disclose Personal Information 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.

e. For other reasons authorized by law: We will share Personal Information with companies, organizations or individuals outside of the Company if disclosure of the information is reasonably necessary for other reasons authorized by law.

The Company shall not otherwise disclose Personal Information to third parties for commercial or other reasons, except as may be specifically required to comply with applicable laws or where you have provided your consent.

10. HOW IS YOUR PERSONAL INFORMATION SECURED?

The Company is committed to protecting the confidentiality and security of all Personal Information against loss and unauthorized access, disclosure, modification or destruction, and therefore has security safeguards appropriate to the sensitivity level of the information in place.

The Company will ensure that all employees and third party service providers with access to information of individuals shall be required as a condition of employment or provision of services to respect the confidentiality of such information and that all employees and third party service providers are aware of the importance of maintaining the confidentiality of such information as part of training requirements.

11. YOUR RIGHTS RESPECTING YOUR PERSONAL INFORMATION

Users may exercise certain rights regarding their Personal Information processed by the Company. In particular, users, after appropriately verifying their identity with the Company, have a right to:

a. Withdraw their consent at any time: users have the right to withdraw consent where they have previously given their consent to the collection, use, disclosure or other processing of their Personal Information. Users may withdraw their consent by contacting our Privacy Officer.

b. Access their Personal Information: Individuals are entitled, with certain legal restrictions, to access and review their Personal Information held by the Company. The Company reserves the right to refuse to provide access to Personal Information in circumstances during which the Company is permitted by law to refuse access, including where providing access would reveal Personal Information about a third party, if the release of the Personal Information could affect the security of an individual, or if the Personal Information is subject to privilege. Requests for access to Personal Information should be made to our Privacy Officer.

c. Request Corrections to Personal Information: Accurate Personal Information is required for efficient and effective delivery of product and services. Individuals may contact our Privacy Officer to modify or correct any Personal Information. Corrections will be made within a reasonable timeframe.

d. Object to Processing of their Personal Information: users have the right to object to the processing of their Personal Information or Personal Data in certain circumstances where Personal Information is being processed on a basis other than consent. In particular, users can object to processing of their Personal Information for purposes of direct marketing at any time.

e. Restrict the processing of their Personal Information: users have the right, under certain circumstances, to restrict the collection, use, disclosure or other processing

of their Personal Information, meaning users can limit how the Company uses their Personal Information or Personal Data.

f. Have their Personal Information deleted or otherwise removed: users have the right, under certain circumstances, to obtain the erasure of their Personal Information or Personal Data from the Company. If required to erase Personal Information or Personal Data, the Company will do so without delay. The Company will not delete any information required to be retained for specified periods of time by applicable laws until the expiry of any such prescribed retention periods. Any requests to exercise user rights can be directed to the Company through the contact details provided in this Privacy Policy. These requests can be exercised free of charge and will be addressed by the Company as early as possible.

12. HOW CAN YOU CONTACT US?

If you have questions about our Privacy Policy or have a concern or complaint about privacy, confidentiality, or our information handling practices; please contact our Privacy Officer at info@fleurdeleaf.net or by mail at PO Box 48043, Bedford, Nova Scotia, B4A 3Z2.

13. DO WE TRANSFER THE DATA INTERNATIONALLY?

If you are utilizing services or visiting the Website from outside of Canada please be aware that you may be sending information (including Personal Information) to Canada where our servers are located. That information may then be transferred within Canada or back out of Canada to other countries outside your country of residence, depending on the type of information and how it is stored by us. These countries may not necessarily have data protection laws as comprehensive or protective as those in your country of residence; however, our collection, use and disclosure of your Personal Information will at all times continue to be governed by this Privacy Policy. Some data collected by Google Analytics may be transferred or processed in the USA.

14. HOW LONG IS YOUR PERSONAL DATA RETAINED?

Personal Information and Personal Data shall be stored for as long as required by the purpose for which it has been collected, used or disclosed. For some Personal Information this can mean a minimum of two years up to a maximum of twenty five years in order to comply with regulatory requirements relating to cannabis. Personal Information or Personal Data which the Company no longer needs to retain shall be destroyed, erased or made anonymous in a secure manner in accordance with the Company's policies respecting the destruction of records.

15. CHANGES TO THIS PRIVACY POLICY

The Company, from time to time, may make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information. We will post any revised version of this Privacy Policy on our websites, and we encourage you to refer back to it on a regular basis.