

## F1NE Privacy Policy

At F1NE Cannabis Cultivation LTD. (hereinafter “F1NE”), we are committed to providing our clients with exceptional service. As providing this service involves the collection, use and disclosure of some personal information about our clients, protecting their personal information is one of our highest priorities.

F1NE’s Privacy Policy is based on Canada’s *Personal Information Protection Electronic Documents Act* (PIPEDA). PIPEDA, which came into effect on April 13, 2000, sets out the ground rules for how businesses and not-for-profit organizations may collect, use, and disclose personal information. We also base our Privacy Policy on the relevant Provincial Acts that concern the collection, use, and disclosure of personal health information, such as Ontario’s *Personal Health Information Privacy Act* (PHIPA), where applicable.

We will inform our clients of why and how we collect, use, and disclose their personal information, obtain their consent where required, and only handle their personal information in a manner that a reasonable person would consider appropriate in the circumstances.

This Privacy Policy outlines the principles and practices we will follow in protecting clients’ personal information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients’ personal information and allowing our clients to request access to, and correction of, their personal information.

### Scope of this Policy

This Privacy Policy applies to F1NE and its subsidiaries.

This policy also applies to any service providers collecting, using, or disclosing personal information on behalf of F1NE.

### Collection of Personal Information

#### Types of Data Collected

##### Personal Data

While using our services, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personally identifiable information may include, but is not limited to:

- Email address

- First name and last name
- Date of Birth
- Phone number
- Gender
- Address
- Usage Data

In our Privacy Policy, personal information may also include personal health information such as identification of your health care providers, physical or mental health status, insurance coverage information, etc.

#### Usage Data

Usage Data is collected automatically when using our services.

This website is hosted by Squarespace. Squarespace collects personal data when you visit this website, including:

- Information about your browser, network, and device
- Web pages you visited prior to coming to this website
- Web pages you view while on this website
- Your IP address

Squarespace needs the data to run this website, and to protect and improve its platform and services. Squarespace analyzes the data in a de-personalized form.

#### Cookies

This website uses cookies and similar technologies, which are small files or pieces of text that download to a device when a visitor accesses a website or app. For information about viewing the cookies dropped on your device, visit [The cookies our shop uses](#) and [The cookies Squarespace uses](#).

- [These functional and required cookies are always used](#), which allow Squarespace, our hosting platform, to securely serve this website to you.
- [These analytics and performance cookies](#) are used on this website, as described below, only when you acknowledge our cookie banner. This website uses analytics and performance cookies to view site traffic, activity, and other data.

## Usage and Disclosure of Personal Information

F1NE may use Personal Information for the following purposes:

- **To manage your account:** to process and manage your registration as a user of our service. The personal data you provide can give you access to different functionalities of the services that are available to you as a registered user.
- **To verify your information:** to verify your personal health information, such as medical documents, medical diagnosis, your identity and other documentation provided to us;
- **To contact you:** To contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide you with communications,** special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or inquired about (unless you have opted not to receive such information). This may also include surveys for feedback on the quality of our products or services.
- **To manage your requests:** To attend and manage your requests to us.
- **For other purposes:** We may use your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns, to evaluate and improve our service, products, services, marketing and your experience, among other purposes.

We may share Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service, for payment processing, to contact You.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of Our business to another company.
- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.

- **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

## Consent

F1NE will obtain client, customer, member consent to collect, use or disclose personal information (except where, as noted below, we are authorized to do so without consent).

When you provide us with personal information to register as a client, complete a transaction, verify your credit card, place an order, or arrange for a delivery, we imply that you consent to our collecting it and using it for that specific reason only.

If we ask for your personal information for a secondary reason, like marketing, we will either ask you directly for your expressed consent, or provide you with an opportunity to say no.

If you change your mind after you opt-in, you may withdraw your consent for us to contact you for the continued collection, use or disclosure of your information at anytime, by contacting us at [csr@f1ne.ca](mailto:csr@f1ne.ca) or mailing us at: F1NE, 5 Peacock Bay, St Catharines ON, Canada, L2M 7N8.

We may collect, use, or disclose personal information without the client's, customer's, member's knowledge or consent in the following limited circumstances:

- When the collection, use or disclosure of personal information is permitted or required by law;
- In an emergency that threatens an individual's life, health, or personal security;
- When the personal information is available from a public source (e.g., a telephone directory);
- When we require legal advice from a lawyer;
- To protect ourselves from fraud;
- To investigate an anticipated breach of an agreement or a contravention of law

## Retention

F1NE will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Information to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

F1NE will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

## Security of Personal Information

F1NE is committed to ensuring the security of client information to protect it from unauthorized access, collection, use, disclosure, modification, copying, disposal, or similar risks.

F1NE takes all reasonable precautions and follows industry best practices to make sure your personal information is secure.

The following security measures are followed to ensure that client personal information is appropriately protected:

- Physical security measures on premises
- Electronic security measures such as user ID and password requirements, encryption, firewalls, and restriction of employee access to personal information

Although no method of transmission over the Internet or electronic storage is 100% secure, we follow all legal requirements and implement additional generally accepted industry standards. We will continually review and update our security policies and controls as technology changes to ensure ongoing personal information security.

## Accuracy of Personal Information

F1NE will make reasonable efforts to ensure that client personal information is accurate and complete.

If the personal information is demonstrated to be inaccurate or incomplete, F1NE will correct the information as required and send the corrected information to any organization to which we disclosed the personal information in the previous year.

## Accessing Your Personal Information

F1NE recognizes that clients have a right to access their personal information, subject to limited exceptions.

### Requesting and Reviewing Personal Information

Clients can request to access their personal information by writing and must provide sufficient detail to identify the personal information being sought. The request can be made to F1NE's Privacy Officer. Upon request, F1NE will also disclose to clients how their personal information is used and whom it has been disclosed to, if applicable.

Requested information will be made available to the client within 30 business days, or F1NE will provide written notice of an extension where additional time is required to fulfill the request.

If a request is refused in full or in part, F1NE will notify the client in writing, stating the reasons for refusal along with the recourse available to the client.

### How to Change or Update Your Personal Information

Clients may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and provide sufficient detail to identify the personal information and the correction being sought.

## Changes and Updates to This Policy

F1NE reserves the right to modify this privacy policy at any time. Changes and clarifications will take effect immediately upon their posting on the website. If changes are made to this policy, it will be displayed here that it has been updated so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it.

This policy was last updated March 2023.

## Questions or Complaints

F1NE's Privacy Officer is responsible for ensuring compliance with this policy, the *Personal Information Protection Electronic Documents Act*, and the *Personal Health Information Privacy Act*.

Clients can direct any questions or concerns in writing to the Privacy Officer:

- By email: [csr@F1NE.ca](mailto:csr@F1NE.ca)
- By mail: 5 Peacock Bay, St Catharines ON, L2M 7N8
- By phone: (905) 646-2000
- By fax: (289) 816-5296