

STASH CITY PRIVACY POLICY

FIGR BRANDS, INC. ("Stash City") is committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes the personal information that Stash City collects from or about you, as well as how we use and to whom we disclose that information. Please review this entire document carefully.

Stash City has adopted a series of Privacy Policies in order to address the specific privacy concerns of certain groupings of individuals. This Privacy Policy applies to how we collect, use and disclose the personal information of our customers, suppliers and other parties with whom we interact. We have developed other documents that describe our privacy policies and practices with respect to our employees (i.e. our "Employee Privacy Policy"). If you are unsure of which Privacy Policy applies to you, please contact our Privacy Officer for more information.

A. PRIVACY POLICY EFFECTIVE FOR CANADA

It is Stash City's policy to comply with the privacy and health information 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 and health information 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. If you are unsure if or how this Privacy Policy applies to you, please contact our Privacy Officer for more information.

B. WHAT IS PERSONAL INFORMATION?

For the purposes of this Privacy Policy, "personal information" is any information about an identifiable individual, other than an individual's business contact information when collected, used or disclosed for the purposes of enabling the individual to be contacted in relation to their business responsibilities. This definition would include, among other things, information about the physical or mental health of an individual.

C. WHAT PERSONAL INFORMATION DO WE COLLECT?

We collect and maintain different types of personal information in respect of the individuals with whom we interact. This includes:

- contact and identification information, such as your name, address, telephone number, e-mail address, date of birth, and gender;
- personal information in connection with your request for certain products or services that you seek from us, including medicinal marijuana;
- additional service-related information concerning the products or services that we provide to, or receive from, you; and
- business relationship information, including information related to your agreements, preferences, advisors, and suppliers, feedback and information requested by or provided to you.

We may also collect market-related information, which may include personal information, concerning market trends and activities impacting our business. We may also collect information related to our media, investor and public relations activities, and information related to our interactions with financial and other advisors.

As a general rule, Stash City collects personal information directly from you. In most other circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you, or implied from your actions).

From time to time, we may utilize the services of third parties and may also receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

MEDICINAL MARIJUANA

Stash City's operations include activities related to: (i) operating marijuana production facilities; (ii) distributing medicinal marijuana to individuals managing certain medical conditions; (iii) conducting clinical research with respect to medicinal marijuana; and (iv) educating our stakeholders (including patients, healthcare practitioners and governments at various levels) about the benefits of medicinal marijuana. As such, Stash City may also collect personal information from individuals participating in and / or impacted by those activities.

For example, in order for you to obtain medicinal marijuana from us, we require you to provide us with: (i) a document known as a "Medical Document" from an authorized healthcare practitioner; as well as (ii) a consent form.

A Medical Document typically includes the following information: (i) your healthcare practitioner's name, profession, business address, telephone, fax, email address, province of registration and registration number; (ii) your name, date of birth and location of consultation; and (iii) dosage information (daily quantity and period of use).

Your healthcare practitioner also has the option to provide us with your diagnosis and additional comments.

A consent form, on the other hand, is required in order for us to verify the information in your Medical Document with the healthcare practitioner (who completed your Medical Document). The information that we collect through this form may include: (i) your name (and if applicable, the name of your substitute decision maker); (ii) your address, telephone, fax and email address; and (iii) the name of your healthcare practitioner.

HEALTHCARE PRACTITIONERS

Information we collect about health care practitioners may be used to comply with our legal and regulatory requirements, including, for example, to verify the information provided on Medical Documents. In certain circumstances, we may be required to disclose such information to the relevant licensing authority that governs the practice of a healthcare practitioner's profession.

OUR WEBSITE

We may collect information related to your visit to our website, including the IP address and domain used to access our website, the type and version of your browser, the website you came from to access our website, the page you entered and exited at, any website page within our website that is viewed by that IP address and what country you are from. We may use this information to monitor our website's performance (such as number of visits, average time spent, page views) and for our other business purposes, such as: (i) customizing certain content that we think you might like based on your usage patterns; (ii) improving our products and services; and (iii) upgrading our website.

In connection with the foregoing, 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 and to record your passwords and preferences. The cookie allows us to track your visit to the website so that we can better understand your use of our website so that we can customize and tailor the website to better meet your needs. 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 the website.

In addition, we collect the personal information that you submit to our website, such as your name, address and any other contact or other information that you choose to provide by, for example:

- applying for a position with Stash City through our website; or
- by corresponding with a representative of Stash City via e-mail using the hyperlinks created for that purpose.

Our website may contain links to other websites that may be subject to less stringent privacy standards. If you click on a link to such a third party website, a third party may also place a cookie on your hard drive. We cannot assume any responsibility for the privacy practices, policies or actions of the third parties that operate these websites. Stash City is not responsible for how such third parties collect, use or disclose your personal information. You should review the privacy policies of these websites before providing them with personal information.

Finally, we may use third party analytics tools to help us measure traffic and usage trends for our website. These tools may use cookies and other technologies to collect information about your use of our website, and collect information sent by your device or our website. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, better understand your online activity, and assists us in improving our website.

For example, we use Google's Universal Analytics to better understand who is using our website and how people are using it. Google may use cookies, pixel tags and other technologies to collect and store information such as website pages visited, places where users click, time spent on each website page, IP address, type of operating system used, location-based data, device ID, search history, and phone number. We use this information to improve our website and as otherwise described in this Privacy Policy. Please visit <http://www.google.com/policies/privacy/partners/> for information about how Google Analytics uses this information, visit <https://tools.google.com/dlpage/gaoptout> for information about the Google Analytics Opt-out Browser Add-on, and visit <http://www.google.com/settings/ads/> to adjust the settings for your Google account.

OTHER COLLECTION

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your knowledge or consent.

D. WHY DO WE COLLECT PERSONAL INFORMATION?

Stash City collects personal information to enable us to manage, maintain, and develop our operations, including for example:

- to establish, maintain and manage our relationship with you so that we may provide you with, or receive from you, the products and services that have been requested;
- to enable you to register and access an account with us;

- to be able to review the products and services that we provide to you so that we may: (i) understand your requirements for our products and services; and (ii) work to improve our products and services;
- to be able to review the products and services that we obtain from you so that we may work with you and so that you may understand our requirements for such products and services;
- to be able to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number);
- to protect Stash City against error, fraud, theft and damage to our goods and property;
- to enable us to comply with applicable law or regulatory process; and
- any other reasonable purpose to which you consent.

Stash City collects personal information (including personal health information) in connection with the provision of health care services ("Healthcare Services"), which includes:

- dispensing medicinal marijuana to you;
- providing knowledge, information and counseling in connection with such services;
- communicating with you to advise you of health-related information and services that may be of assistance or interest to you;
- assisting physicians and other healthcare professionals as needed;
- responding to requests made by, or on behalf of, your insurance provider to review your insurance claim(s), to the extent applicable;
- recommending products, services, programs or events to manage your healthcare needs;
- managing your patient record, including medical marijuana dispensed and services provided;
- obtaining and processing payments for the medicinal marijuana dispensed to you;
- monitoring and investigating incidents and managing claims;
- if requested, referring you to other healthcare providers; and
- performing obligations in accordance with, or complying with, applicable healthcare-related professional, legal or regulatory requirements.

E. HOW DO WE USE YOUR PERSONAL INFORMATION?

We may use your personal information:

- as permitted or required by applicable law or regulatory requirements;
- for the purposes described in this Privacy Policy; and
- for any additional purposes for which we have obtained your consent to the use or disclosure of your personal information.

We may also use information we collect about you in the aggregate for statistical purposes, for example to identify the demographics of our clients, the types of diagnoses that our clients are using medical marijuana to treat, and the types of strains that are most beneficial for different diagnoses. We may publish and/or disclose aggregate statistics to third parties but never any identifiable personal information (except in accordance with this Policy).

Please note: Our website may provide you with an opportunity to interact with others and share your thoughts, information, content and materials (collectively, "User Generated Content"). You are solely responsible for the User Generated Content that you post on our website. Unless explicitly stated otherwise, any User Generated Content that you post onto our website (including your username) will be made publicly available. As such, do not post any personal information onto our website (such as your name or address) if you wish to remain anonymous.

Finally, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required to do so by applicable law or regulatory requirements.

F. WHEN DO WE DISCLOSE YOUR PERSONAL INFORMATION?

HEALTHCARE SERVICES

When we provide you with Healthcare Services, we may share your personal information (including your personal health information) with your healthcare providers (which may also be referred to as your "circle of care") and your authorized family members. We may also share it with others but only with your consent or as otherwise permitted by law. For example, we may share your personal health information with designated individuals (e.g. parents, caregivers) who have authority to collect such information. All such sharing is done in a manner consistent with this policy.

We may share your personal information with your provincial drug benefit program, private health insurance provider, or other health claim adjudicator as necessary in order to process your claim. We may also, as required by law, provide your personal information to regulatory authorities, government bodies and/or registries.

MANAGING OUR BUSINESS

We may share your personal information with our employees, contractors, consultants, affiliates and other parties who require such information to assist us with managing our relationship with you, including: (i) third parties that provide services to us; (ii) third parties that assist Stash City in the provision of services to you; and (iii) third parties whose services we use to conduct our business.

For example, we may share your personal information from time to time with our third party information technology, data processing and payment processing service providers so that we may operate our business. As a result, your personal information may be collected, used, processed, stored or disclosed in Canada and the United States. As such, your personal information may potentially be accessible to law enforcement and national security authorities of that jurisdiction.

In addition, personal information may be disclosed or transferred to another party during the course of the grant of a security interest in Stash City's assets, or completion of, all or a part of Stash City through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.

OTHER SHARING

Your personal information may be disclosed:

- for the purposes described in this Privacy Policy;
- as part of an audit by the Minister of Health;
- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- as part of the regular reporting activities of Stash City and its affiliates;
- to protect the rights and property of Stash City;
- during emergency situations or where necessary to protect the safety of a person or group of persons; and
- with your consent.

As above, Canadian law permits or requires the use or sharing of personal information without consent in specific circumstances.

G. YOUR CONSENT IS IMPORTANT TO US

It is important to us that we collect, use or disclose your personal information where we have your consent to do so. Depending on the sensitivity of the personal information,

your consent may be implied, deemed (using an opt-out mechanism) or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you enter into an agreement with us, we will assume your consent to the collection, use and disclosure of your personal information for purposes related to the performance of that agreement and for any other purposes identified to you at the relevant time.

Typically, we will seek your consent at the time that we collect your personal information. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information. If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), we will endeavor to advise you of that purpose before such use or disclosure.

We assume that, unless you advise us otherwise, you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy.

H. CHOICE/OPT-OUT

You may change or withdraw your consent at any time, subject to legal or contractual obligations and reasonable notice, by contacting our Privacy Officer using the contact information set out below. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Privacy Officer.

I. HOW IS YOUR PERSONAL INFORMATION PROTECTED?

Stash City will endeavor to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction.

The security of your personal information is important to us, please advise our Privacy Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody or control.

J. UPDATING YOUR PERSONAL INFORMATION

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes.

In some circumstances we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

K. ACCESS TO YOUR PERSONAL INFORMATION

You can ask to see your personal information. If you want to review, verify or correct your personal information, please contact our Privacy Officer. Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We may charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact our Privacy Officer.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices. In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

L. PRIVACY OFFICER

We have appointed our Privacy Officer to oversee compliance with this Privacy Policy, and help us manage and monitor our compliance with privacy and health information legislation. The contact information for our Privacy Officer is as follows:

Figr Brands, Inc.
3400 One First Canadian Place
PO Box 130, Toronto, Ontario
M5X 1A4
Attention: Privacy Officer
E-mail: info@canadiancultivated.com
Telephone: [416-863-1200](tel:416-863-1200)

M. INQUIRIES OR CONCERNS?

If you have any questions about this Privacy Policy or concerns about how we manage your information, please contact our Privacy Officer by telephone, in writing or by e-mail.

We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you.

You may potentially be able make a complaint under the Ontario *Personal Health Information Protection Act* to the Information and Privacy Commissioner of Ontario. If so, complete the applicable form found here: <https://www.ipc.on.ca/privacy/filing-a-privacy-complaint/>. If you reside in another jurisdiction, you may potentially file a complaint with the relevant authority in that jurisdiction.

N. REVISIONS TO THIS PRIVACY POLICY

Stash City, 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 website, and we encourage you to refer back to it on a regular basis.

O. INTERPRETATION OF THIS PRIVACY POLICY

Any interpretation associated with this Privacy Policy will be made by our Privacy Officer. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples; therefore, where the word "including" is used, it shall mean "including without limitation".

This Privacy Policy does not create or confer upon any individual any rights, or impose upon Stash City any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal privacy laws and its provincial privacy and health information laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and any such laws, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.

This Privacy Policy was last updated on October 1, 2020.