

Privacy Policy  
Last Updated: 10.14.19

Your privacy and trust are important to us. This Privacy Policy (“**Privacy Policy**”) explains how NR Parentco, LLC (“**Native Roots**”), including its affiliates and its subsidiaries (collectively “**Company**” or “**we**” or “**u**”) collects, handles, stores and protects personal information about you when you use our website located at [www.nativerootscannabis.com](http://www.nativerootscannabis.com) (the “**Website**”), and services accessed through our Website. It also provides information about your rights and how you can contact us if you have questions about how we handle your information. This Privacy Policy applies to:

- The information we collect or that you provide when you access the Website;
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy DOES NOT apply to information that:

- We collect offline or through any other Company services; or
- You provide to or is collected by any third party, whether or not you access any third-party app or website via the Website. Those websites and apps may have their own privacy policies, which we encourage you to read before providing information on or through them.

Please read this Privacy Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, do not use the Website or any services provided through the Website. This Privacy Policy may change from time to time; we will provide notice of such changes by changing the “Last Updated” date.

#### **Age Restrictions.**

The Website is offered and available to anyone of legal age to purchase our products or services. Please do not use this Website if you are not at least 21 years of age. We do not knowingly collect personal information from anyone who does not meet our age requirements. If we learn we have collected or received personal information from an individual who does not meet our minimum age requirements, we will delete that information.

#### **Information We Collect and How We Collect It.**

We collect information in several ways. The type of information we collect depends on how you are interacting with us and which of the Website services you are using.

We collect personal information when you provide it directly to us. For example:

- When you sign up for our newsletter or ask us a question on our Website form, we may ask for contact information including, for example, your name, email address, or phone number (“**Contact Data**”);
- From time to time, we may ask for your personal information in connection with sweepstakes, contests or other promotions that we or our partners sponsor (“**Contest Data**”);
- We collect information when you make a purchase using the Website (“**Purchase Data**”);
- We collect personal information when you report a problem with our services or Website. If you contact us, we may keep a record of that correspondence (“**Help Data**”);
- If you fill out a survey that we request for research purposes, we may store your responses (“**Survey Data**”).

We also collect information automatically when you visit our Website:

- Through our server logs and other technologies that collect system/device and usage information, including without limitation IP address, browser type, device type, time spent on pages, and similar information (“**Site Data**”); and
- We may place cookies, web beacons, or other trackers on your browser; see Cookies and Other Technology below for more information.

### **Our Purpose in Collecting Information**

We use your personal information for a number of legitimate interests, including to provide and improve our services, administer our relationship with you and our business, for marketing, and in order to exercise our rights and responsibilities by law.

### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information, as follows:

- We use Contact Data and Help Data to send you email marketing and to respond to your queries on our Website, as applicable;
- We use Contest Data to administer our sweepstakes and other promotions. We may also share Contest Data with partners or joint venturers if they are involved in those promotions;
- When you make a purchase from the Website, we provide the Purchase Data to a third-party provider to enable the transaction to take place. We do not receive, store, or maintain your financial information.
- We may internally use Site Data to improve the Website’s content and layout, to improve outreach, for our direct marketing, and to determine a general geographic and demographic profile of visitors to the Site. We also use Site Data for system administration, order verification, internal marketing, and system troubleshooting purposes.

In general, we also use the information we collect to (i) fulfill any other purpose for which you provide it; (ii) give you notices about your account including expiration and renewal notices; and (iii) carry out our obligations and enforce our rights arising from any contracts entered into between you and us.

### **Cookies and Other Technologies**

Cookies are small pieces of information that a website stores on your computer while you are viewing a website. We may use both session cookies (which expire once you close your web browser) and persistent cookies (most of which have an expiration date, based on the purpose of the cookie, at which point they self-delete) to provide you with a more personal and interactive experience on our Website. You may remove persistent cookies by following Internet browser help file directions. See below for your choices regarding these technologies.

We generally use cookies and similar technologies as follows:

- for “essential” or “functional” purposes, such as to enable various features of the Website like remembering passwords or staying logged in during your session;
- for social media integration, e.g., via third-party social media cookies, when you share information using a social media sharing button or “like” button on our Site, or when you engage with our content on or through a social networking website such as Facebook or Twitter;
- for analytics purposes, consistent with our legitimate interests in how our Website is used or performs, how users engage with and navigate through the Website, what sites users visit before visiting our Website, how often they visit our Website, and other similar information;

- subject to any consent required by law, for the purpose of displaying advertisements via retargeting to those users who have visited our Website, or for targeting advertising to visitors to our Website; and
- subject to any consent required by law, for the purpose of analyzing your feedback on our products on other platforms.

### **Third-Party Information Collection**

We share your information with third parties for the following purposes:

- We may offer services in conjunction with a partner company. In order to provide co-branded services to you, it is necessary to share your personal information with our partner company to provide co-branded services. If data is being collected and/or maintained by any company other than us, you will be notified prior to the time of such data collection or transfer. If you do not want your data to be shared, you can choose not to allow the transfer by not using a particular service. Certain third parties may use automatic information collection technologies to collect information about you or your device.
- We share your email address with third parties that help with our marketing efforts, such as email list administrators.
- We share personal information and anonymized data with third party hosting and analytics companies to host the Website and services, and to improve our offerings.
- We share your personal information with payment processors and third-party logistics providers for processing and shipping of your order from the Website.
- Under confidentiality agreements, we may match user information with third party data. We may also disclose aggregated user statistics (for example, 47% of our Website users are female) in order to describe our services to prospective partners, advertisers, or other third parties, and for other lawful purposes.
- We may share your information with third parties in special circumstances, such as when we believe in good faith that the law requires it, pursuant to a corporate transaction, or under circumstances described below.
- We may disclose account information where we have reason to believe that disclosing this information is necessary to identify, contact or bring legal action against someone who may be violating our Terms and Conditions of Use or who may be causing injury or interference with (intentionally or unintentionally) our rights or property, those of other Website users, or anyone else that could be harmed by such activities.

### **Disclosure of Aggregated Information**

We may disclose aggregated information about our users and information that does not identify any individual without restriction in any way permitted by applicable law.

### **Your Choices About Collection, Use, and Disclosure of Your Information**

We strive to provide you with choices regarding the personal information you provide to us. This section describes mechanisms we provide for you to control certain uses and disclosures of your information.

- **Promotions by the Company.** When you sign up for various services on our Website, you are agreeing to receive marketing and promotional materials from us. We may deliver marketing and communications to you across various platforms such as e-mail, text messaging, and direct mail.

Where required by law, we will ask you to explicitly opt-in to receive such marketing from us. If we send you marketing communications it will include instructions on how to opt out of receiving those communications in the future. If you do not want us to use your telephone number or e-mail address to promote our own or third parties' products or services, you can also opt-out by sending us an email [Compliance@nativerootsdispensary.com](mailto:Compliance@nativerootsdispensary.com).

- **Accessing and Correcting Your Personal Information.** Subject to applicable law, you may also send us an email at [Compliance@nativerootsdispensary.com](mailto:Compliance@nativerootsdispensary.com) to request access to, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

We do not control third parties' collection or use of your information to serve interest-based advertising. However these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads from members of the Network Advertising Initiative ("NAI") on the NAI's [website](#).

### **Data Security**

We take the security of your data seriously and we use appropriate technologies and procedures to protect it according to the risk level and the service provided. We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. Financial information will be encrypted using SSL technology.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access any part of the Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

### **Your Rights**

When law provides, you may have rights to access your personal information and ask us to rectify, erase or restrict use of your personal information. You may also have rights to object to your personal information being used, to ask for the transfer of personal information you have made available to use, and to withdraw consent to use your personal information. We will honor your rights under applicable data protection laws. If you believe you have rights under applicable law that you would like to exercise, please contact us at the email address below.

### **Contact Information**

If you have any questions, comments, complaints or suggestions in relation to data protection of this Privacy Policy, or any other concerns about the way in which we process information about you, please contact us at:

Native Roots Cannabis Co.  
Attn: Compliance Department  
3150 South Sheridan Blvd.  
Denver, CO 80227  
Telephone: 303-830-4770  
Email: [Compliance@nativerootsdispensary.com](mailto:Compliance@nativerootsdispensary.com)