

# **METRC GLOBAL PRIVACY POLICY**

## Our Commitment to Privacy

Metrc LLC and our affiliates (the “Company”) are committed to your privacy. We want you to be familiar with how and why we collect, use and disclose your information. This Privacy Policy is intended to comply with U.S. and international data protection and privacy laws including the California Consumer Privacy Act, Nevada Online Privacy Law, and the EU General Data Protection Regulation among others; and describes our practices in connection with information that we collect online and offline.

## What Information We Collect

“Personal Information” is information that identifies you as a natural person or relates to an identifiable natural person. We collect and process the following Personal Information:

- Personal contact information such as name, address, telephone number and email address;
- Business contact information such as business address, telephone number and email address;
- Information necessary to provide our products and services to you or your organization;
- Instructions, comments, and opinions you provide when you contact us directly by email, chat, online forms, telephone, or mail;
- Your opinions via surveys we send to you regarding current services, potential new services that may be offered;
- Information that you choose to provide to us when you interact with us;
- Location data; and

“Other Information” is any information that does not reveal your specific identity or does not directly relate to an identifiable individual. We may collect and process the following Other Information:

- Browser and device information such as such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the platform or software you are using.
- App usage data such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.
- Information collected through cookies, pixel tags and other technologies such as the address of the page you are visiting, the address of the referrer page you previously visited, the time you are viewing the page, your browsing environment, and your display settings.
- IP addresses.
- Third party analytics information regarding website traffic behavior, bounce rate, pages visited, and time spent on a page.
- Demographic information and other information provided by you that does not reveal your specific identity; and
- Information that has been aggregated in a manner such that it no longer reveals your specific identity.

If we are required to treat Other Information as Personal Information under applicable law, then we will collect, use and disclose it for the purposes for which we collect, use and disclose Personal Information as detailed in this Policy.

## How We Collect Personal Information

We and our service providers may collect Personal Information online in a variety of ways in connection with providing our products and services. Examples include:

- Through our websites (“Websites”);
- Through the software applications made available by us for use on or through computers and mobile devices (“Apps”);
- Through social media platforms (“Our Social Media”);
- Through email messages (“Emails”);
- Through extranet sites made available to our customers and third parties (“Extranet Sites”);
- Through products and services we provide to our customers; and
- Through our registration process for newsletters, seminars, webinars, and events.
- Through our online application process if you apply for a job with us.

We also may collect Personal Information offline in a variety of ways in connection with our products and services. Examples include:

- When you participate in a contractual arrangement for our products and services;
- When you provide information in conjunction with our products and services;
- When you provide information over the phone;
- When you provide information through paper-based forms, applications, and other documents;
- When you interact with us at a trade show, in connection with a sales call, or in other similar situations;
- When you participate in a contest, sweepstake, or promotion;
- When you provide information in connection with a rebate; or
- When you interact with us at a Company event, seminar, or clinic.

We also may collect Personal Information from other sources. Examples include:

- Publicly available databases;
- Joint marketing partners and event sponsors, when they share the information with us;
- Entities to which we provide products and services, which may include your employer;
- Referral sources; and
- Social media platforms.

If you disclose any Personal Information relating to other people to us or to our service providers in connection with our products and services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

We and our service providers may collect Other Information in a variety of ways including:

- Through your browser or device;
- Through your use of an app;
- Through use of cookies;
- Through use of web beacons;
- Through logging your IP Address;
- Through use of third party analytics such as Google Analytics.

## How we use Personal Information

We and our service providers use Personal Information for legitimate business purposes, including:

### **Providing our products and services to you and managing our relationships**

- To contact you in connection with providing our products and services;
- To respond to your inquiries and fulfill your requests, administer your accounts, and provide you with information on our products and services;
- To provide our products and services and to process a return; and
- To manage our relationships, including responding to reviews.
- To send administrative information to you, such as information regarding our products and services and changes to our terms, conditions and policies;

We collect and process your information for this purpose to enter into and performing our contracts with you, to comply with a legal obligation, and/or to pursue a legitimate business interest.

### **Providing you with our newsletter and/or other marketing materials, facilitating social sharing, and administering promotions**

- To send you our newsletters, publications, updates, and mailings related to our seminars, events, or products and services that we think may be of interest to you;
- To fulfill your event registration requests and provide services, including the provision of seminars and other events;
- To send you information about our products and services and other news about our Company; and
- To administer your participation in a contest, sweepstake, rebate or other promotion or to send you prizes that you might have won.

We collect and process your information for this purpose based on your consent or to pursue a legitimate business interest.

### **Maintaining and improving the functionality of our Websites and other media**

- To provide our Website's, Social Media, and Apps' functionality to you, such as arranging access to your registered account and providing you with related client service;
- To make improvements to the Website, Social Media, and Apps.
- To help you personalize your online experience.

- To understand traffic patterns and the number of visitors to our network of websites, our affiliates' websites, and other non-Company websites with whom we partner;
- To understand how you use and interact with our products and services;
- To provide anonymous individual and/or aggregate auditing, research, modeling and reporting;
- To determine which email messages sent by us, or our agent, were opened and to note whether a message was acted upon.
- To derive your approximate location from your IP address.
- To enhance, improve, or modify our current products and services;
- To determine the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our users, customers and clients;
- To maintain, improve, and protect our data systems; detect security incidents to prevent malicious, deceptive, fraudulent, or illegal activity; and prosecute those responsible for such activity;

We collect and process your information for this purpose to pursue a legitimate business interest.

### **Meeting our legal, regulatory and contractual obligations**

- To comply with business related laws and regulations;
- To comply with data privacy laws and regulations;
- To exercise and protect our legal rights; and
- To comply with our contractual obligations with our affiliates, service providers, business partners, and other third parties.

We collect and process your information for this purpose to comply with our legal obligations and to pursue a legitimate business interest.

We need to collect Personal and Other Information in order to provide our products and services to you, and to accomplish our business purposes. If you do not provide the information requested, we may not be able to provide our products and services or accomplish our business purposes.

## **How we disclose personal information**

We disclose Personal and Other Information:

### **To our affiliates for the purposes described in this Privacy Policy**

- Subject to local requirements, this information may be used to provide products and services offered by our other legal entities and for all the purposes outlined in this Privacy Policy.
- Metrc LLC is the party responsible for the management of the jointly-used Personal and Other Information.

### **To our third party service providers and trusted business partners to facilitate services they provide to us**

- These can include providers of services such as website hosting, products and services-related consulting and monitoring, data analysis, information technology and related infrastructure

provision, customer service, email delivery, auditing, fulfill orders you have placed on the Website, or fulfill the purpose for which you have provided it (such as for contests or promotions) and other services.

- All such third parties are prohibited from using your personal information except to provide these services to the Company, and they are required to maintain the confidentiality of your information.

**To public authorities in response to lawful requests by public authorities to comply with national security or law enforcement requirements.**

**We also use and disclose your Personal Information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:**

- To comply with applicable law and regulations, including laws outside your country of residence;
- To cooperate with public and government authorities, including authorities outside your country of residence;
- To cooperate with law enforcement;
- For other legal reasons, such as to enforce our terms and conditions and to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and
- In connection with a sale, merger or business transaction.

Please keep in mind that if you directly disclose Personal Information or other sensitive data through public message boards, conversation pages, blogs, profile pages, or other similar platforms services the Personal Information or sensitive data you disclose may be publicly posted and otherwise publicly available for use.

## How long we retain Personal Information

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide our products and services to you (for example, for as long as you have an account with us or keep using our products and services);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions or communications for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal rights (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

## What security measures we use

While no security program can fully protect Personal Information from unauthorized disclosure, we have implemented internal policies and technical measures to protect Personal Information from loss, accidental destruction, misuse or disclosure. Such internal policies and technical measures include:

- The use of pseudonymization and encryption of personal data where appropriate;
- Procedures and controls to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and platforms;
- Procedures for regularly testing, assessing and evaluating the effectiveness of technical and organizational measures for ensuring the security of the processing;
- Procedures to ensure that data is not accessed, except by individuals in the proper performance of their duties;
- The use of contractual language requiring our service providers and other third parties to whom we disclose Personal Information to comply with applicable data privacy laws and to protect the confidentiality of the information; and
- Training all of our employees who handle Personal Information on how to properly handle and protect Personal Information.

## Your choices regarding marketing-based communications

If you supply us with your address (mailing or e-mail) or your telephone number, you may receive periodic mailings, telephone calls or texts from us or our affiliates with information on new products and services or upcoming events or other updates. We will comply with all legal requirements to obtain your consent for such mailings, telephone calls and texts prior to sending you marketing-based communications. If you do not wish to receive such mailings (whether by e-mail or paper mail), or telephone calls, please let us know by e-mailing us at: [Insert Email Address] with the word "unsubscribe" in the subject line. Please provide us with your exact name, mailing address, e-mail address and/or telephone number. If you do not wish to receive marketing-based text messages, please let us know by sending us a text to [Insert Contact Information] with the word "STOP" in the subject line.

With the data we have collected on your activities on the Website or through other interactions with us, we may, with your consent or pursuant to our legitimate business interests, provide advertising of our products and services personalized to your individual interests, and we may share such information with our service providers in order to advertise our products and services to you. We may also work with online advertising vendors to provide you with ads of our products and services that you may find relevant. These ads may appear on our Website or on the websites of third parties. In addition, these ads may be based upon information collected by us or third parties.

To opt out of certain of the personalized advertising, you may be able to adjust settings on your browser or on your mobile device. Please see the documentation associated with your browser and mobile device for more information. In addition, the Digital Advertising Alliance provides information on how to opt out of personalized advertising; for more information, please click here:

<http://optout.aboutads.info/?c=2&lang=EN>.

## Additional Privacy Notice and Rights for California Residents

We comply with the California Consumer Privacy Act (CCPA), California Online Privacy Protection Act (CalOPPA), and other applicable California laws. In addition to the privacy protections and rights described in our Privacy Policy, California residents have the following rights:

- You have the right to know about the personal information we collected and disclosed about you and your household during the prior 12 months including:
  - The specific pieces of personal information we have collected about you and your household, and
  - The categories of personal information we have collected about you, and your household including the categories of sources from which your personal information was collected, business or commercial purposes for which your personal information was collected, the categories of third parties to whom we disclosed your personal information, and the business or commercial purpose for disclosing your personal information to a third party.
  
- You have the right to request us to delete the personal information that we have collected or maintained about you and your household. We will delete your personal information by permanently erasing the information on our existing systems, de-identifying the personal information, or aggregating the personal information. If your personal information is stored on or archived on back-up systems, we will delete the personal information when our archived or back-up system is next accessed or used. We will also direct the third parties to whom we have provided your personal information to delete your personal information.

You can request access to or deletion of your personal information or the personal information of your household by submitting a request to us by emailing us at: [privacy@metrc.com](mailto:privacy@metrc.com). To protect the security of your personal information, we will require you to provide us with identifying information for you or your household such as email address, telephone number, a description of the product or service you purchased or inquired about, and/or other information that we can match with the personal information we have collected about you or your household to verify your identities.

You may use an authorized agent to request access to or deletion of your personal information or the personal information of your household. We will require your authorized agent to provide us with either (1) a power of attorney authorizing the authorized agent to act on your behalf or (2) your written authorization permitting the authorized agent to request access to your personal information on behalf of you or your household. Further, we will require you or your authorized agent to provide us with identifying information to verify your identity and/or the identities of your household members.

Within 10 days of receiving your request to know, we will confirm receipt of your request and provide information about how we will process your request. Generally, we will respond to your request within 45 days. If we need more time to respond, we will provide you with notice and an explanation of the reason we need more time to respond. We may deny your request if we cannot verify your identity or are legally permitted to deny your request. If we deny your request, we will explain the basis for the denial, provide or delete any personal information that is not subject to the denial, and refrain from using the personal information retained for any purpose other than permitted by the denial. We will maintain a record of your request and our response for 24 months.

You have the right to receive our products and services on equal terms regardless of whether or not you exercise your rights under the CCPA.

Individual California residents also have the right under the California Online Privacy Protection Act (CalOPPA) to request information about our disclosures of certain categories of personal information to our affiliates or third parties for their direct marketing purposes. We will provide a list of the categories of personal information disclosed to third parties or our affiliates for their direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties or affiliates. This request may be made no more than once per calendar year. Individual California Users must submit their requests to us either by email at: [privacy@metrc.com](mailto:privacy@metrc.com). We reserve our right not to respond to requests submitted other than to the email or mailing addresses specified in this section.

Your web browser may have a “Do Not Track” feature that is intended to automatically inform websites you visit to not track your online activities. Our Website does not process or respond to these “Do Not Track” signals from your browser.

If you have questions or concerns regarding our privacy practices or your privacy rights as a California resident, please contact us as described in the Contact Us section below.

## Additional Privacy Rights for Nevada Residents

Although we do not sell your personal information, you have the right to direct us not to sell certain personally identifiable information that we collect about you on our Websites or other online services by emailing us at: [privacy@metrc.com](mailto:privacy@metrc.com). This information includes: your first name or first initial and last name in combination with your social security number; driver’s license number, driver authorization card number or identification card number; account number, credit card number or debit card number, in combination with any required security code, access code or password that would permit access to your financial account; medical identification number or a health insurance identification number; user name, unique identifier or electronic mail address in combination with a password, access code or security question and answer that would permit access to an online account.

Additionally, you may review and request that we change the personally identifiable information that we collect about you on our websites or other online services by emailing us at: [privacy@metrc.com](mailto:privacy@metrc.com).

## Privacy rights for residents of the European Economic Area, the United Kingdom, and Switzerland

If you are resident in the European Economic Area (EEA), the United Kingdom (UK), or Switzerland, you have the following additional rights in respect of your Personal Information that we hold:

- Right of access. You have the right to obtain confirmation of whether, and where, we are processing your Personal Information; information about the categories of Personal Information we are processing, the purposes for which we process your Personal Information and information as to how we determine applicable retention periods; information about the categories of recipients with whom we may share your Personal Information; and a copy of the Personal Information we hold about you.



- Right of portability. You have the right, in certain circumstances, to receive a copy of the Personal Information you have provided to us in a structured, commonly used, machine-readable format that supports re-use, or to request the transfer of your personal data to another person.
- Right to rectification. You have the right to obtain rectification of any inaccurate or incomplete Personal Information we hold about you without undue delay.
- Right to erasure. You have the right, in some circumstances, to require us to erase your Personal Information without undue delay if the continued processing of that Personal Information is not justified.
- Right to restriction. You have the right, in some circumstances, to require us to limit the purposes for which we process your Personal Information if the continued processing of the Personal Information in this way is not justified, such as where the accuracy of the Personal Information is contested by you.
- Right to object. You have a right to object to any processing based on our legitimate interests where there are grounds relating to your particular situation. There may be compelling reasons for continuing to process your Personal Information, and we will assess and inform you if that is the case. You can object to marketing activities for any reason.
- If you are resident in France, you also have the right to set guidelines for the retention and communication of your Personal Information after your death.

If you wish to exercise one of these rights, please contact us at [privacy@metrc.com](mailto:privacy@metrc.com).

EEA residents also have the right to lodge a complaint to your local data protection authority. Further information about how to contact your local data protection authority is available at: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm). UK residents have the right to lodge a complaint with the UK Information Commissioner's Office at: <https://ico.org.uk/make-a-complaint/>. Swiss residents have the right to lodge a complaint with the Swiss Federal Data Protection and Information Commissioner at: <https://www.edoeb.admin.ch/?lang=en>.

Residents in other jurisdictions may also have similar rights to the above. Please contact us at [email address] if you would like to exercise one of these rights, and we will comply with any request to the extent required under applicable law.

## Children's Privacy Policy

Our products and services are not intended for those under the age of 18, and we will not knowingly collect Personal Information from such individuals under the age of 18.

## Third Party Services

This Privacy Policy does not address, and we are not responsible for, the privacy, information or other practices of any third parties.

This includes any third party operating any website or service to which our Websites link. The inclusion of a link on our Websites does not imply endorsement of the linked site or service by us or by our affiliates.

In addition, we are not responsible for the information collection, use, disclosure or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Information you disclose to other organizations through or in connection with the Apps or our Social Media.

## Changes to this Privacy Policy

We will occasionally update this Privacy Policy to reflect current Company policies. If this Privacy Policy is revised, the revised Privacy Policy will be posted here with the date of the most recent version posted above. Continued use of the Website after any such revision or update constitutes your acceptance of the Privacy Policy as so revised or modified. We encourage you to periodically review this Privacy Policy to be informed of how the Company is protecting your information. Finally, the terms of this Privacy Policy are subject to all applicable laws, rules, and regulations. This Privacy Policy was last updated on June 24, 2022.

## Contact Information

We welcome your comments regarding this Privacy Policy. If you believe that we have not adhered to this Privacy Policy or if you have any other questions, please feel free to contact us: [privacy@metrc.com](mailto:privacy@metrc.com).