

Medical Marijuana Practitioners Inc. Privacy Policy

This Privacy Policy was last updated on Feb 6th, 2019

Your privacy and the privacy of your personal information is important to us. Medical Marijuana Practitioners Inc. (“MMJP”) is providing this notice to describe and explain how your personal information is collected, used and disclosed by us when you use our website located at <http://www.mmjp.ca> (“Website”) and procure our products and services; and the choices you can make about the way your information is collected and used.

By providing us with your personal information you agree to our collection, use and disclosure of your personal information in accordance with this Privacy Policy.

This Privacy Policy forms part of MMJP’s [Terms of Use](#) and should be read together with the Terms of Use.

In general, you can visit this Website without telling us who you are or revealing any personal information about yourself. There are times, however, when we may need information from you. In certain cases, your refusal to provide necessary personal information may impact your ability to interact with us or register as a client of MMJP.

The term “personal information” has the same meaning as set out in the federal Personal Information Protection and Electronic Documents Act (“PIPEDA”), which means any information about an identifiable individual including contact information, name, address, phone number or email address, gender, date of birth, and any data about yourself that you choose to provide electronically through the Website or otherwise, i.e. through the MMJP Registration Application Form.

The term “personal health information” has the same meaning as set out in Ontario’s Personal Health Information Protection Act, 2004 (“PHIPA”), and includes information relating to your physical or mental health, as well as your health history, medical records, prescriptions and your health card number.

In this Privacy Policy, the term personal information also encompasses personal health information as appropriate.

Any data that has been collected in which all personal identifiers have been removed, such that the information could not reasonably be used to identify the individual, is not considered personal information or personal health information. This type of anonymized information may be used for research purposes.

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. MMJP will collect, use and disclose your personal information without your consent only in limited circumstances as permitted or required by law. In certain limited circumstances, we may be called upon 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 that they may receive.

Consent

By using this Website or by otherwise providing personal information to MMJP, 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. Please contact our Information Officer listed below to find out how. 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.

Information Collection

We may collect personal information from and/or about you for the purpose of registering you as a client of MMJP, providing information and services to you as a MMJP client, and for purposes relating to billing and administration, such as:

- your name and contact information, including address, telephone number and email address;
- your date of birth and gender;
- insurance coverage and payment information, if applicable;
- information in connection with the products or services you inquire about or purchase from us; and
- other information as necessary to maintain our business relationship with you, such as information related to your preferences, feedback and information requested by or provided to you.

MMJP may also collect personal information for the purpose of evaluating market trends and other activities relating to our business. To provide you with timely, valuable information, we may also ask you to provide us with information regarding your professional interests and experiences with our products or services. Providing us with this information is optional.

MMJP 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 online may also be combined with information you provide to us through other sources such as product registration, call centres, or in conjunction with events such as trade shows, training seminars and conferences.

Information Uses and Disclosures

MMJP will use and disclose your personal information for the purpose of providing services to you as an educator of medical cannabis and as described in this Privacy Policy. We may use and disclose your personal information as permitted or required by applicable law or regulatory requirements.

We will use personal information to register you as a client of MMJP and to provide you with information and services, to help us better understand your needs and to provide you with services and for any additional purposes for which we have obtained your consent to the use or disclosure of your personal information. For example, we may use and disclosure your personal information to:

- register you as a client of MMJP;
- 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 MMJP 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 or the Website of our partners by providing customized content on our Website or otherwise;
- obtain and process payments for medical cannabis dispensed to you, which includes providing necessary information to our third-party payment processors, Square, Inc. – please see (<https://squareup.com/ca/en/legal/general/privacy>) for Square’s statement on its privacy policies and practices;
- seek reimbursement from your insurer;
- enable us to comply with applicable laws and specifically the requirements of The Cannabis Act issued pursuant to the Canadian Controlled Drugs And Substances Act.

MMJP may share your personal information (including your personal health information) with your healthcare providers and your authorized family members and individuals designated by you such as caregivers who have authority to collect such information. All such sharing is done in a manner consistent with this Privacy Policy.

Your personal information may be anonymized and, in some cases, aggregated with anonymized information from other MMJP customers for purposes relating to statistical analyses and other research purposes.

MMJP is committed to helping both patients and doctors better understand the benefits and utility of cannabis as a medical tool, for a variety of ailments. We use voluntary, aggregated and anonymous health data as a part of that research program. As a MMJP client you are under no obligation to participate and if you would like your data to be excluded from this research

program, you can opt-out. If you would like more information about our research program, please feel free to contact us.

Web Server Logs

In the process of administering this Website, we maintain and track usage through Web server logs. Web server logs provide information such as what types of browsers are accessing our Website, what pages receive high traffic and the times of day our servers experience significant load. We use this information to improve the content and navigation features of our site. Anonymized or aggregated forms of this data may be used to identify future features and functions to develop for the Website and to provide better customer service.

Cookies

Certain technologies, called cookies, can be used to provide tailored information from a Website. A cookie is an element of data that a Website can send to your browser, which your browser may then store on your system. Some pages on our Website use cookies that assist you in navigating and using the Website— for example, to help you access secure areas. MMJP may set these types of cookies without requesting your consent. Other pages on the Website may set cookies to collect aggregate usage information that we use to improve Website functionality. Cookies may also be used on our Website to remember certain choices you make, such as your geographical region, your user name or other personalization. We use these cookies to improve your user experience, so we can better serve you when you return to our Website. MMJP considers your use of this Website as your consent to set these types of cookies. MMJP may work with select third-party partners who set cookies to serve you MMJP-related content, including advertisements, on their sites or elsewhere on the Internet, based on your prior visits to our Website. MMJP also sets cookies that look at your preferences when you use the Website so that we may offer you tailored marketing collateral, such as whitepapers, that may be of interest to you. You may need to enable use of these kinds of cookies via the mechanism provided by this Website for these cookies to work. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it. By using our Website, you agree that we can place these types of cookies on your system. For more information, please refer to user information provided with your Web browser. If you disable cookies, some site functionality may be limited.

Personalized URL Links and Personalized Message Content

Occasionally, we may create a unique web page link for specific Website visitors. If you visit one of these web pages, you may find forms that are already filled out with your name, or other types of information you have previously indicated an interest in, based on information you have given us before. We may also personalize the content of newsletters, e-mail offers, invitations or MMJP advertisements served to you on our third-party partners' Websites, based on topics in which you have previously indicated an interest. If you choose to visit one of these personalized web page links, you are agreeing to allow us to collect information about your visits and also to associate that information with other information about you and your relationship with MMJP. If you do not wish your information to be used in this way, do not accept the invitation to visit these sites.

Other Technologies

MMJP may use other technologies to capture specific data, such as the pages you view, the items you download, the links you click, your access times, and your Internet Protocol (IP) address, domain name, and system configurations and settings, to help us understand how you use our site, serve you relevant content and assist you with questions you may have regarding our products and services.

Opt-out

MMJP provides you the opportunity to receive different types of communication and information related to our company and our offerings. You may subscribe to e-newsletters or other publications; you may also elect to receive marketing communications and other special offers from us via e-mail. If at any time you would like to change your communication preferences, we provide unsubscribe links and an opt-out mechanism for your convenience. You may also opt-out by sending us an email or through regular mail (addresses below).

Updating and Access to Your Personal Information

It is important that the personal information we have in our records about you is accurate and current. If your personal information changes, you should notify us as soon as possible.

If you want to review, verify or correct your personal information, please contact our Information Officer in writing.

Links to Third-Party Websites

We may provide links to third-party Websites for your convenience and information. If you access those links, you will leave the MMJP Website. MMJP does not control those sites or their privacy practices, which may differ from the practices outlined in this Privacy Policy. Please review the privacy policies of every Website that you visit.

Data Security

To prevent unauthorized access or disclosure, maintain data accuracy and ensure the appropriate use of information, we have put in place reasonable physical, electronic and managerial procedures to safeguard and secure the information we collect online. We, and our third-party service providers (such as payment processors), use encryption technology when collecting or transferring sensitive data such as credit card information. Credit card and debit card numbers are used only for processing payment and are not used for other purposes.

Although we will make reasonable efforts to protect personal information from loss, misuse or alteration by third parties, you should be aware that there is always some risk that an unauthorized third party could find a way to thwart our security systems. This risk is heightened if you are using unsecured/public Wi-Fi.

Third-Party Service Providers

Your personal information may be shared with third-party information technology, data and payment processing and other service providers engaged by us who require such information to assist us with managing our relationship with you, including third parties that provide services to us or on our behalf. Such third parties may be located outside of Canada, including in the United States.

As a result, you understand that and consent to your personal information being collected, used, processed, stored and/or disclosed in a jurisdiction other than Canada and understand that it may potentially be accessible to law enforcement and national security authorities of that jurisdiction. However, in the event that foreign law enforcement and/or national security authorities request your personal information, it shall only be provided in strict accordance with the law and subject to all required legal permissions.

Business Transactions

In the event that MMJP enters a business transaction, such as a merger with a third party, acquisition by another company or the sale of a portion of our business, your personal information may be disclosed or transferred to another party, provided that such party is 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.

Changes to this Privacy Policy

From time to time, we may change and update this Privacy Policy – the information we collect, the way we use that information and the options you have as a visitor/user of this Website – by providing you with notice by email at the address you provided as part of your registration; providing you with the opportunity to review the amended Privacy Policy; and requiring that you accept the amended Privacy Policy prior to being permitted to continue to access and use the Website. Your agreement to the amended Privacy Policy shall become effective at the time you indicate your agreement to MMJP

MMJP Privacy Contact

Should you have comments or questions about this Privacy Policy, you may e-mail us at: support@mmjp.ca

To ensure your inquiry is handled promptly, please use “Privacy” in the subject line of your email.

You may also contact us via mail:

MMJP. 484 Garrison Rd, suite 1, Fort Erie, Ontario. L2A 1N2