

## ECOCANN PRIVACY POLICY

*Last Updated: June 28, 2020*

In order to ensure transparency and give you more control over your personal information, this privacy policy (“**Privacy Policy**”) governs how we, EcoCaNN Ltd. (“**EcoCann**”, “**we**”, “**our**” or “**us**”) use, collect and store personal information we collect or receive from or about you (“**you**”) such as in the following use cases:

- (i) When you browse or visit our website at [www.ecocann.life] (“**Website**”);
- (ii) When you contact us (e.g. support, need help, or on social media);

PLEASE NOTE AND CONSIDER THAT THIS PRIVACY POLICY APPLIES ONLY TO THE WEBSITE. ANY ACCESS OR USAGE OF ANOTHER WEBSITE OR PLATFORM THAT ARE OWNED OR OPERATED BY THIRD PARTIES (EVEN IF SUCH OTHER WEBSITE OR PLATFORM WERE LINKED, MENTIONED OR REFERRED TO VIA THE SITE, SUCH AS THE ECOCANN MOBILE SOFTWARE APPLICATION) ARE SUBJECT TO SUCH WEBSITE OR PLATFORM'S GOVERNING DOCUMENTATION (SUCH AS THE TERMS OF USE, PRIVACY POLICY AND THE COOKIES POLICY). WE ENCOURAGE YOU TO READ SUCH DOCUMENTATION OF EACH THIRD PARTY WEBSITE OR PLATFORM THAT YOU MAY CHOOSE TO VISIT.

We greatly respect your privacy, which is why we make every effort to provide a platform that would live up to the highest of user privacy standards. Please read this Privacy Policy carefully, so you can fully understand our practices in relation to personal information. In this Privacy Policy, “**personal information**” means any information that can be used, alone or together with other data, to uniquely identify any living human being. **Important note:** Nothing in this Privacy Policy is intended to limit in any way your statutory right, including your rights to a remedy or means of enforcement.

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This Privacy Policy can be updated from time to time and, therefore, we ask you to check back periodically for the latest version of this Privacy Policy. If we implement significant changes to the use of your personal information in a manner different from that stated at the time of collection, we will notify you by posting a notice on our Website or by other means.

### 1. WHAT INFORMATION WE COLLECT, WHY WE COLLECT IT, AND HOW IT IS USED

Specific personal information we collect	Why is the personal information collected and for what purposes?	Consequences of not providing the personal information
<i>When you browse or visit our Website</i>		
Cookies, analytic tools and log files.	<ul style="list-style-type: none"> <li>• For statistics and marketing purposes.</li> <li>• To better understand our website visitors</li> <li>• To improve how we present our content</li> <li>• To collect information about the Website</li> <li>• To improve the Website by measuring any errors that may occur</li> </ul>	Certain Website features may not be available.
<i>When you contact us (e.g. support, need help, or on social media)</i>		
<ul style="list-style-type: none"> <li>• Email address</li> <li>• Any other information that you provide to us e.g. message</li> </ul>	<ul style="list-style-type: none"> <li>• To receive, process and respond to your request(s)</li> </ul>	<ul style="list-style-type: none"> <li>• We cannot receive, process and respond to your request(s)</li> </ul>

Finally, please note that some of the abovementioned personal information will be used for detecting, taking steps to prevent, and prosecution of fraud or other illegal activity, to identify and repair errors, to conduct audits, and for security purposes. Personal information may also be used to comply with applicable laws, with investigations performed by the relevant authorities, law enforcement purposes, and/or to exercise or defend legal claims. In certain cases, we may or will anonymize or de-identify your personal information. “Anonymous Information” means information which does not enable identification of an individual user, such as aggregated information about the use of our services. We may use Anonymous Information and/or disclose it to third parties without restrictions (for example, in order to improve our services and enhance your experience with them).

## 2. HOW WE PROTECT AND RETAIN YOUR INFORMATION

2.1. Security. We have implemented appropriate measures to protect your personal information. However, please note that we cannot guarantee that the information will not be compromised as a result of unauthorized penetration to our servers. As the security of information depends in part on the security of the computer, device or network you use to communicate with us and the security you use to protect your user IDs and passwords, please make sure to take appropriate measures to protect this information.

- 2.2. Retention of your personal information. In addition to the retention periods mentioned above, in some circumstances we may store your personal information for longer periods of time, for example (i) where we are required to do so in accordance with legal, regulatory, tax or accounting requirements, or (ii) for us to have an accurate record of your dealings with us in the event of any complaints or challenges, or (iii) if we reasonably believe there is a prospect of litigation relating to your personal information or dealings. We have an internal data retention policy to ensure that we do not retain your personal information perpetually.

### 3. **HOW WE SHARE YOUR PERSONAL INFORMATION**

We share your personal information as follows:

- 3.1. With our hosting providers.
- 3.2. With our staff and other entities within our group.

We may also share your personal information as follows:

- 3.3. To the extent necessary, with regulators, courts or competent authorities, to comply with applicable laws, regulations and rules (including, without limitation, federal, state or local laws), and requests of law enforcement, regulatory and other governmental agencies or if required to do so by court order;
- 3.4. If, in the future, we sell or transfer, or we consider selling or transferring, some or all of our business, shares or assets to a third party, we may disclose your personal information to such third party (whether actual or potential) in connection with the foregoing events; and/or
- 3.5. In the event that we are acquired by, or merged with, a third party entity, or in the event of bankruptcy or a comparable event, we may transfer, disclose or assign your personal information in connection with the foregoing events.

### 4. **YOUR PRIVACY RIGHTS**

Rights: You can exercise your rights by contacting us at [support@ecocann.life]. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly in accordance with applicable law or inform you if we require further information in order to fulfil your request. When processing your request, we may ask you for additional information to confirm or verify your identity and for security purposes, before processing and/or honoring your request. We reserve the right to charge a fee where permitted by law, for instance if your request is manifestly unfounded or excessive. In the event that your request would adversely affect the rights and freedoms of others (for example, would impact the duty of confidentiality we owe to others) or if we are legally entitled to deal with your request in a different way than initially requested, we will address your request to the maximum extent possible, all in accordance with applicable law.

### 5. **USE BY CHILDREN**

The Website is not structured to attract children under the age of 18 years. Accordingly, we do not intend to collect Personal Information from anyone we know to be under 18 years. In the event that we become aware that you provide personal data in violation of applicable privacy laws, we reserve the right to delete it. If you believe that we might have any such information, please contact us at [support@ecocann.life].

## 6. LOG FILES

We use log files. The information inside the log files includes internet protocol (IP) addresses, type of browser, Internet Service Provider (ISP), date/time stamp, referring/exit pages, clicked pages and any other information your browser may send to us. We use such information to analyze trends, administer the Website, track users' movement around the Website, and gather demographic information.

## 7. ANALYTIC TOOLS

We use the following analytic tools:

- 7.1. **Google Analytics.** The Website uses a tool called “**Google Analytics**” to collect information about use of the Website. Google Analytics collects information such as how often users visit this Website, what pages they visit when they do so, and what other websites they used prior to coming to this Website. We use the information we get from **Google Analytics** to maintain and improve the Website and our products. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google's ability to use and share information collected by Google Analytics about your visits to this Website is restricted by the Google Analytics Terms of Service, available at <http://www.google.com/analytics/terms/us.html/>, and the Google Privacy Policy, available at <http://www.google.com/policies/privacy/>. You may learn more about how Google collects and processes data specifically in connection with Google Analytics at <http://www.google.com/policies/privacy/partners/>. You may prevent your data from being used by Google Analytics by downloading and installing the Google Analytics Opt-out Browser Add-on, available at <https://tools.google.com/dlpage/gaoptout/>.
- 7.2. **365 analytics** (operated by Microsoft)
- 7.3. **AppsFlyer.** (operated by AppsFlyer Ltd. and its affiliates)

## 8. SPECIFIC PROVISIONS APPLICABLE UNDER CALIFORNIA PRIVACY LAW

- 8.1. Our California Do Not Track Notice: Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. Please note that we do not respond to or honor DNT signals or similar mechanisms transmitted by web browsers.
- 8.2. Deletion of Content from California Residents: If you are a California resident under the age of 18 and a registered user, California Business and Professions Code Section 22581 permits you to remove content or personal information you have publicly posted. If you wish to remove such content or personal information and you specify which content or personal information you wish to be removed, we will do so in accordance with applicable law. Please be aware that after removal you may not be able to restore removed content. In addition, such removal does not ensure complete or comprehensive removal of the content or personal information you have posted and that there may be circumstances in which the law does not require us to enable removal of content.
- 8.3. Your Choices: You have certain choices about your Personal Information. Where you have consented to the processing of your Personal Information, you may withdraw that consent at any time and prevent further processing by contacting us as described in this Privacy Policy. Even if you opt out, we may still collect and use non-Personal Information regarding your activities on our services and for other legal purposes as described above. While we cannot guarantee privacy perfection, we will address any issue to the best of our ability as soon as possible. We will process such requests in accordance with applicable laws. To protect your privacy, we will take steps to verify your identity before fulfilling your request.

## 9. CONTACT US

If you have any questions, concerns or complaints regarding our compliance with this notice and the data protection laws, or if you wish to exercise your rights, we encourage you to first contact us at [support@ecocann.life].