



## **MPG Privacy Policy**

We, the Marijuana Policy Group (“MPG”, “us”, “we”, and “our”), would like to inform you of our policies concerning the collection, use, and disclosure of personal information we obtain from users of our Services, including our website.

### **1. Personal Information**

In order to access our Services, we may ask you to provide us with certain information that can be used to contact or personally identify you. This information may include, but is not limited to, your name, email address, postal address, and phone number; the name, email address, postal address, phone number and contact name of/for your employer or customer on whose behalf you access or use our Services; and if you use a third-party service, such as Google, to access or use our Services, any contact or personally identifying information that you make available to us through that third-party service; and billing information associated with you, your employer or customer, and/or third party service (collectively, “Personal Information”).

We will not use personal information to collect or store account numbers from credit cards, debit cards, bank accounts or other financial systems; collect or store U.S. Social Security Numbers, drivers’ license or other personal identification numbers issued by any government or financial institution; or collect, store or otherwise handle personal information in a manner not disclosed by Customer to the user, or in violation of any applicable state or federal laws.

### **1B. How We Use Personal Information**

As a policy, MPG only uses sensitive information in ways that are compatible with the purposes for which it was collected or subsequently authorized by the individual. MPG takes reasonable steps to ensure that sensitive information is relevant to its intended use, accurate, complete, and current. MPG does not provide any of the information we collect to third parties other than to market our products and services.

Without your Personal Information, we may not be able to provide you with access to our Services.

## **2. Website**

Like many other service providers, we may, at our option, maintain logs of the information that your browser or computing platform sends to us whenever you visit our website or access our Services. This information may include your computing platform's Internet Protocol address, browser type, browser version, the pages of our website that you visit, and times of your visits, the time spent on these pages, referrer links, and other related statistics. Also, like many other service providers, we may, at our option, make use of cookies (which are sent to your browser from a website) or other data files which we send from our Services or website and store on your computing platform. We may use these cookies or other data files to collect information about how you visit our website or access our Services. While you may configure your browser or computing platform to refuse cookies, please be aware that this may prevent you from using all functions of our website or Services.

## **3. Notice and Consent**

We will take commercially reasonable steps to protect any Personal Information we hold, and we will provide you with a copy of, and correct, any of your Personal Information that we hold upon your request. We may disclose your Personal Information to third parties without your consent in the event it is reasonably necessary to do so in order to enforce our Terms of Service (for example, to collect payments that are in arrears), or in order to cooperate with law enforcement. Otherwise, we will not disclose your Personal Information to third parties without your consent except as permitted or required by law. We will inform individuals about the type(s) of sensitive information it collects, the purposes for which it collects and uses sensitive information, and the types of non-agent third parties to which we disclose or may disclose information.

We will offer individuals the opportunity to choose (opt-out) where their information is to be (a) disclosed to a non-agent third party, or (b) used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual. Per the EU General Data Protection Regulation, an opt-in opportunity will be provided to applicable individuals prior to data collection.

## **4. Access and Correction**

If you wish to view and/or correct the Personal Information we hold for you, or if you have questions about our privacy policy, please contact us at [info@mjpolicygroup.com](mailto:info@mjpolicygroup.com).

## **5. Regulatory Information**

This policy embodies the internationally accepted principles of data protection and privacy, without replacing existing national laws. It applies in all cases as far as it is not in conflict with the respective national law; additionally, the national law shall apply if it makes greater demands. National law applies in the case that it entails a mandatory deviation from, or exceeds the scope of, this statement for data protection. This statement also applies in countries in which there is no corresponding national legislation in place.

EU GDPR: MPG adheres to the EU General Data Protection Regulation as set forth by the European Parliament & Council regarding the processing of personal data and the free movement of such data.

EU-U.S. and Swiss-U.S. Privacy Shield: MPG adheres to the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. The Federal Trade Commission has jurisdiction over MPG's compliance with the Privacy Shield.

If there are any conflicts between the terms in this statement and EU data privacy principles, the principles shall govern.

## **6. Changes to the Policy**

We may make changes to this Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on the MPG website.