

Privacy Policy

Last Modified and Effective Date: May 1, 2020

INTRODUCTION

We value and respect the privacy of every individual and we want you to be aware of how we collect, use, transfer, disclose, and store your information.

This Privacy Policy describes our practices in connection with the Information (defined in Section 3) collected from our websites, social media pages, mobile sites and applications, blogs, interactive applications, emails and text messages (SMS and MMS) that we send to you, and other interactive features (each a "Site," collectively the "Sites"), through our online advertisements on third-party websites, and through vendors/sources from which we source information.

The information collected under this Privacy Policy may be used in the manner described herein. When used in this Privacy Policy, the terms "Truss", "we," "us," and "our" refer to Truss/HEXO Cannabis Infused Beverage Division ("Truss/HEXO CIB"), a division of HEXO Operations Inc., a licensed producer of cannabis products in Canada and Truss Beverage Co., who operates and maintains this site on behalf of Truss/HEXO CIB. For the purposes of applicable data protection and privacy law, the Truss entity to whom you submit your Information and / or who operates the Site through which you communicate with us will be the controller of Personal Information (defined below) collected from you on the Sites.

Privacy Policy Effective for Canada

Our policy is to comply with the privacy legislation in each jurisdiction in which we operate. Sometimes the privacy legislation and/or an individual's right to privacy are different from one jurisdiction to another. This Privacy Policy covers only those activities that are subject to the provisions of Canada's federal and provincial privacy policy laws as applicable.

We encourage you to read the entire Privacy Policy to familiarize yourself with our practices.

Policy

This Privacy Policy applies to the information we obtain from individuals interacting with us and our Sites, products, and services. It does not apply to information we obtain in our capacity as an employer. You are not required to provide any Information when you interact with our Sites; however, if you elect not to do so, you may not have access to certain features of the Sites and other services.

1. ACCESS RESTRICTED TO PEOPLE OF LEGAL CONSUMPTION AGE

Truss sites and access to all advertising and marketing information are not directed to individuals under legal consumption age. All advertising and marketing information is intended only for persons of legal age based on the jurisdiction where content is being

accessed or viewed. You will be required to verify being of legal age prior to entering or interacting with a Site.

We do not knowingly collect, use, or disclose personal information from anyone under legal age and request that such individuals do not provide any information (defined below) to us or access our sites. If we become aware that we have unknowingly collected personal information from an individual under legal age, we will make reasonable efforts to delete such information from our records.

IF YOU ARE UNDER THE LEGAL CONSUMPTION AGE IN YOUR JURISDICTION AND HAVE ENTERED OUR SITE BY PROVIDING A FALSE DATE OF BIRTH, **YOU MUST IMMEDIATELY LEAVE THE SITE**. IF YOU BELIEVE SOMEONE UNDER THE LEGAL CONSUMPTION AGE HAS PROVIDED US WITH INFORMATION BY OBTAINING ACCESS IN VIOLATION OF THE APPLICABLE SITES' ACCESS RESTRICTIONS, PLEASE CONTACT US IMMEDIATELY AND THIS INFORMATION WILL BE REMOVED.

2. HOW WE COLLECT, USE AND DISCLOSE OF INFORMATION

Types of Information

Truss may collect two types of information (collectively, "Information"):

- A. "**Personal Information**" is information about an identifiable individual as defined by applicable law. Examples of Personal Information include:
- Contact information (e.g., name, home or physical address, birth date, email address, telephone number, and mobile phone number);
 - Billing and shipping information (e.g., credit/debit card number, expiration date, CVV code, billing and shipping addresses and contact information);
 - Social media account information (e.g., user name and passwords, profile images, and other images that you make available such as user-generated content);
 - Other Personal Information as deemed necessary or provided voluntarily.
- B. "**Other Information**" is information collected from Sites, the Internet and third-party sources that do not specifically identify an individual. Examples of Other Information generally include:
- Demographic information including date of birth, gender, interests, province, postal code, time zone and language, when it is not identifiable to a specific individual;
 - Preferences, shopping habits, and other lifestyle information, including product wish lists, order history, marketing preferences, and cell phone carrier;
 - Search queries;
 - Application usage data;
 - Server log file location, internet service provider, mobile or other device identifier (e.g., UDID and MEID), user agents, or IP address;

- Information collected through cookies, tags, pixels, clear pixels, beacons, and other similar technologies;
- Geo-location information such as your precise or approximate location;
- Referring and exiting websites/URLs (including click through URL and pixel tags);
- Browser and device information (including platform and version);
- Other aggregated or anonymous information.

In certain jurisdictions, certain Other Information may be considered Personal Information. To the extent that any information is considered Personal Information by local law, we also treat this information as such and ensure that our handling of this Personal Information complies with all applicable data privacy and protection laws. Similarly, if we combine Other Information with Personal Information, the resulting information will be treated as Personal Information for as long as it remains combined.

To the extent permitted by applicable law, any Personal Information may be combined with any Other Information that you provide to us through other channels, that is publicly available, or that we may otherwise obtain, including from third parties.

How We May Collect Information

Truss Beverages may collect Information from the following:

- From You (e.g., information, such as date of birth, gender, hobbies and interests, consumption habits, postal code and your preferred means of communication when you voluntarily provide it);
- Our Sites and Applications (e.g., when you purchase a product on an e-commerce Site or opt-in to receive emails);
- Online tracking technologies, including cross-device tracking (e.g., service file logs, IP address, cookies, tags, pixels, clear pixels, gifs, bugs, beacons, and other similar technologies, some of which may enable Truss or our service providers to identify you and collect information about you across devices and Sites);
- Mobile usage (i.e., information learned from our mobile application, such as your device's latitude and longitude or your device's location capabilities (e.g., GPS, Wi-Fi, Bluetooth signal, beacons, LED light chips or other similar technologies)) and 3rd party mobile pay applications or services.
- Through your browser or device (e.g., certain information, including your computer type, operating system name and version, IP address, Media Access Control (MAC) address, language, Internet browser type and version, and service provider that is often automatically collected by most browsers);
- Through website analytics and advertising features (e.g., Google Analytics, Google Analytics Demographics, Interest Reporting)

- Other Sources (e.g., public databases; joint marketing partners, social media platforms, from people with whom you are connected on social media platforms, public forums, and from other third parties).

How We May Use Information

To the extent permitted by applicable law, Truss may use your Information to:

- Send administrative information to you, for example, information regarding the Sites and changes to our terms, conditions, and policies. NOTE - Because this information may be important to your use of the Sites, you may not opt-out of receiving these communications;
- Send you marketing communications and updates about Truss Beverages for which you have opted in, including information about new products, events, and promotions (e.g., emails, push notifications, SMS and MMS messages);
- Deliver customized or targeted advertisements to you based on Information we have obtained from your use of our Sites and advertising, Information we have obtained from third parties, or a combination of these sources, including past purchases or interests;
- Permit you to engage with or post on our social media pages and blogs, and any similar platform in which you choose to engage with us and other consumers. Please note that any information you post or disclose on these platforms will become public information, and may be available to visitors to the Sites and to the general public;
- Allow you to send messages to a friend (legal consumption age only) through the Sites. By using this functionality, you are telling us that you are entitled to use and provide us with your friend's contact information.
- Conduct marketing research and analysis, and other business purposes, including but not limited to audits, developing new products, enhancing our communication with you and our Sites, evaluating the effectiveness of our media buys, identifying trends and traffic/download patterns, and diagnosing problems;
- Personalize your experience on our Sites, including displaying content based upon your location, past purchases, interests, as well as Information collected across devices and Sites;
- Enhance and improve our products, services, content, advertising, and promotions;
- Comply with or enforce applicable legal requirements, including complying with laws outside of your country of residence;
- Respond to requests from governmental authorities, including those outside of the country of residence; and
- Use your Information for other purposes on an anonymized or aggregate basis, or as otherwise required by law.

- We may also share your Information within Truss in a manner consistent with this Privacy Policy. We may also share your Information with third-parties as described below.

3. TRACKING TECHNOLOGIES

Cookies and Tracking Technologies

Truss utilizes “cookies”, “tags”, “pixels”, “clear gifs” and other similar tracking technologies on our Sites. A cookie is a text file that is placed on your computer or other mobile device when you access the Sites or the Internet. These technologies allow Truss to collect information about your interaction with our Sites and advertisements. Examples of such information may include, but are not limited to: demographic information, browser type, IP address, pages viewed, activity conducted, and timing of your visit. You may at any time "opt out" of certain tracking mechanisms through your browser settings. However, disabling such features may prevent you from using certain features or taking full advantage of all of our offerings on our Site.

Different types of cookies are used for different purposes on our Sites, these are known as: strictly necessary cookies, performance cookies, and functionality cookies. Some cookies may be provided by an external third party to provide additional functionality to our Site and these are included below.

Strictly necessary cookies

These are cookies that are essential to fulfil an action requested by you, such as identifying you as being logged in. If you prevent these cookies by adjusting your browser settings, we cannot guarantee how our Sites will perform during your visit.

Performance cookies

These are cookies used to improve our Sites, for example for analytics that let us see how our Site is being used and where to make improvements. These cookies are used to collect Information about how visitors use our Sites. The Information is collected in an anonymous form and includes the number of visitors, where visitors have come from to the Sites and the pages they visited.

Functionality cookies

These cookies enhance the performance and functionality of our Sites, often as a result of something you're doing as a user. For instance, we may personalize our content for you or remember your preferences.

Truss, our trusted service vendors/providers, and permitted third parties may also advertise our products on third-party websites. Third-party websites may also use cookies or other tracking devices. Truss, our trusted service vendors/providers, and permitted third parties do not have control over the tracking technologies utilized by third-party websites. As such, you should carefully review the privacy policies of those third-party sites to understand their tracking activities, if any.

Do Not Track Requests

We will automatically collect cookies and other information when you visit the Site. Due to this automatic collection, we do not currently honor browser based “do not track” requests. We currently participate in third party ad networks and use third party cookies as discussed above to track your visits across websites. For information on how to opt-out of the collection of information by other tracking devices please refer to the “Choice/Opt-Out” section below.

Disabling Cookies on Your Browser

You may refuse or delete cookies on our Sites. Please refer to your browser Help instructions to learn more about cookies and other tracking devices and how to manage their use. If you choose to refuse or delete cookies, some of the functionality of our Sites may be impaired. If you use another computer or change browsers, you will need to repeat the process of refusing or deleting cookies. For more information about cookies including how to set your internet browser to reject cookies please go to www.allaboutcookies.org.

Ad Tracking

Certain devices may allow you to Limit Ad Tracking. Please refer to the settings on your computer or device for information on how to disable Ad Tracking.

4. TRANSACTIONS

In some cases, we may use a third-party payment service to process purchases made through the Sites (if any), including but not limited to reservation sites and eCommerce/online retail shop sites. In these cases, your Information may be collected by this third party and not by us and will be subject to the third party’s privacy policy, rather than this Privacy Policy. We have no control over, and are not responsible for, this third party’s use or disclosure of your Information.

5. SHARING YOUR INFORMATION/DISCLOSURE TO THIRD-PARTIES

At times, Truss may make certain Information available to third parties (e.g., trusted vendors and providers) and within our family of companies/brands. We will only share your Information with these third parties and related entities in the ways that are described in this Privacy Policy. Truss or persons that help us with our business activities are authorized to use your aforementioned information only as necessary to provide these services or as otherwise described below. If you wish to opt-out of having your information shared with third parties in applicable circumstances (for example where your Personal Information is used for marketing/promotional purposes), please contact us as described below under “Privacy Inquiries.”

For example, Truss may share the Information it collects about you in the following instances:

- With our trusted service vendors/providers to evaluate and improve our marketing and promotional efforts, content, products and services, to better understand customer

interests and preferences, to provide you relevant information, and to conduct joint marketing programs;

- With our trusted service vendors that help us with business activities (e.g., processing credit card transactions, administering sweepstakes and contests, shipping your order, assisting us in Site operations, providing customer service, and delivering email communications);
- With our trusted service vendors/providers who work on our behalf and who do not have an independent right to use the Information to which they have access or that we disclose to them;
- In connection with a corporate change including a merger, acquisition, or sale of assets;
 - To third-party partners with whom we may enter into a relationship (e.g., joint marketing campaigns). Depending on the purposes for this sharing, Truss may provide you with the option of whether this Information may be shared prior to sharing with such a partner. The subsequent use of the Information by the third-party partner will be governed by their own privacy practices and policies;
 - As required by law, such as in conjunction with a government inquiry or to comply with a subpoena or similar legal process;
 - When we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request; and
 - To any other third party with your prior formal consent to do so.

6. LOCATION BASED SERVICES

Truss may collect the physical location of your device by, for example, using satellite, GPS, cell phone towers, beacons, or Wi-Fi signals. We may use your device's physical location to provide you with personalized location-based services and content, including advertising. We may also share your device's physical location, combined with information about what advertisements you viewed and other information we collect, with our marketing partners to enable them to provide you with more personalized content, including advertising and to study the effectiveness of advertising campaigns. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device's location, but if you choose to deny such uses and/or sharing, we and/or our marketing partners may not be able to provide you with the applicable personalized services and content. Unless you provide consent, this location data is collected anonymously in a form that does not personally identify you. For example, when you download a Truss Site (including mobile application) on your device, you may have the opportunity to state that you would like to share your location.

For information about opting out of location-based services, please refer to Settings in your device settings.

7. SECURITY AND STORAGE OF INFORMATION

The security, integrity, and confidentiality of your Information are extremely important to us. Truss uses administrative, technical, and physical security to protect the Information we maintain to ensure that it is used according to this Privacy Policy. Please be aware though that, despite our best efforts, no security measures are perfect or impenetrable. If you have reason to believe that your Personal Information is not secure, please contact us immediately.

When you post on social networking platforms or other public platforms, the Information that you share is visible to other users and can be read, collected, or used by other users. Truss is not responsible for Information that you voluntarily share or submit on these platforms. For example, if you list your name, age, and address on a social media site, this Information is public.

We will store your Personal Information for as long as is reasonably necessary for the purposes for which it was collected, as explained in this notice. In some circumstances, we may store your Personal Information for longer periods of time, for instance where we are required to do so in accordance with legal, regulatory, tax, or accounting requirements.

In specific circumstances, we may store your Personal Information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your Personal Information or dealings.

8. SOCIAL NETWORKS/ONLINE COMMUNITIES

On certain Sites, we may enable you to access online communities for sharing Information such as messages, photos, and videos. You may only share this Information with persons of legal drinking age based on the jurisdiction from where you are accessing such Site. We may also enable you to post content from some Sites to your profile on other social networks. Please be aware that the privacy policy of the social networking site will apply to any content you post on or provide to that Site. In addition, when you post or share content or communications from our Sites with any third-party social network you also allow us to share Information with that third-party social network.

We cannot control any policies or terms of such third-party social networks. For example, sharing such Information with Facebook may require us to implement cookies and/or APIs in order to facilitate the communication between our Sites and Facebook. That Information, shared through cookies and/or APIs, then becomes subject to Facebook's Data Policy, located at www.facebook.com/full_data_use_policy. As a result, we cannot be responsible for any use of your Information or content by a third-party social network, which you use at your own risk.

9. LINKED SITES

Our Sites may contain links to third-party websites or applications not controlled by Truss or covered by this Privacy Policy. If you submit Information to any of those websites, your

Information is governed by their privacy policies. We encourage you to carefully read the privacy policy of any website or application that you visit. We have no control or authority over third-party sites and are not responsible any Information that you may submit on that site.

Please note that if you provide Information to us via a social media site or participate in a social media site linked to our Sites, you consent to our use of your Information for any reason as if it were submitted to us directly via the Site.

10. ADDITIONAL INFORMATION

Our Sites may include interactive programs that provide specific services from another company, such as “liking” or sharing content, often referred to as widgets. You may have the opportunity to submit Information, such as your email address, for collection through a widget. A widget may also use cookies and/or collect usage data. Information collected by a widget is governed by the privacy policy of the company that created it.

Third Party Analytics

Google Analytics - For more information on how to opt out of our use of Google Analytics and our use of its Advertising Features visit <https://tools.google.com/dlpage/gaoptout> and <http://www.google.com/safetycenter/tools/>,

11. PRIVACY INQUIRIES, CORRECTING YOUR INFORMATION, AND CHOICE/OPT-OUT

If you have any questions or comments regarding this Privacy Policy, or if you would like to review, update, correct, or remove any Personal Information from our records, please contact us using the information below. Once we receive your request for removal, we will remove Your Personal Information from our records unless we have a specific legal requirement to retain your Personal Information. However, except where disclosure is required by law, we may decide not to grant access or make revisions where the burden or expense of providing access would be disproportionate to the risks to the individual's privacy in any given case, or when the rights of others would be violated by granting the access.

We have appointed the person set out below to oversee compliance with this Privacy Policy as our Privacy Officer, and to help us manage and monitor our compliance with privacy legislation. The contact information for our Privacy Officer is as follows:

Karyn Sullivan
Head of Legal & Corporate Affairs
Truss Beverage Co.
100 King Street West, #1600
Toronto, ON M5X 1G5
Email: privacy@trussbeverages.com

Please note that email communications are not always secure; so please do not include any sensitive information, including credit card information, in your emails to us.

Any requested deletions or changes may not be effective immediately. We will aim to address your request as soon as practicable.

12. CHANGES TO THIS PRIVACY POLICY

Your use of the Sites and continued use of the Sites following any changes to the Privacy Policy, signifies that you agree with the terms and conditions of the Privacy Policy. If you do not agree to the terms of this Privacy Policy, please do not use the Site or provide any Information to us.

We may update this Privacy Policy from time to time by posting additions or modifications to this page, so we encourage you to periodically review this Privacy Policy.

To help you stay current of any changes, we note the date the Privacy Policy was last updated above, your use of any Site following the posting of any revised Privacy Policy shall be deemed acceptance of the revised policy, so we strongly recommend that you review the Privacy Policy periodically.