

# Privacy Policy

Effective Date: August 15, 2018

Welcome to **JUUL.ca** offered by JUUL Labs Canada, Ltd. (“JUUL Labs”, “us” or “we”). This privacy policy (the “Privacy Policy”) addresses how information is collected, stored, and utilized through our website, **JUUL.ca** (the “Website”), including information collected through our website portal at live events such as trade shows, and any mobile application we may offer in the future which is linked to this Policy (the “App”). This privacy policy also addresses customer information we collect through interactions with JUUL customer service, either collected through our App and Website customer service portals, or over the phone (together with the App, and Website, the “Service”).

By accessing or using our Service, you signify that you have read, understood and agree to our collection, storage, use and disclosure of your personal information, as applicable, as described in this Privacy Policy and the Website’s respective Terms of Service.

Our Privacy Policy provides a detailed description of how JUUL Labs handles personal information that we collect. **We encourage you to read our full Privacy Policy, as it contains important information for you.**

If you do not have time to read our full Privacy Policy now, we have summarized some of the key points for you below. Additional information on each of these points can be found in our full policy.

## SUMMARY OF KEY POINTS

Please note that this is a brief summary only, and we encourage you to read our full Privacy Policy for more information on each of these key points.

### What personal information do we collect?

- We collect information directly from you when you register on our Website, purchase a product, sign up for our Newsletter mailing list, or otherwise communicate with us, including your name, phone number, mailing address, email address (and the contents of any email you send to us), and payment information.

- We also collect information about you and your friends, from any social network you may have connected from, including your user ID or profile information.
- We collect personal information that you post on the Service, such as photos, comments, ratings and other information you choose to post.
- We also collect information about how you use our Service and read our emails using a variety of technologies such as cookies, persistent cookies, web beacons, third party analytics tools and similar technologies, including your domain name, browser type, operating system, IP address, web pages viewed while visiting our site, links clicked, length of time spent on our Service, and reference website from which you accessed the Website.
- When you download and use the App, we automatically receive certain information about which JUUL Labs products are connected to the App, your mobile device and your usage of the App, such as the device operating system, the time you spent using the App, which features of the App you access and use, and error messages you receive.
- We engage a third-party service provider to collect information on our behalf, which is necessary to verify your age, for compliance with applicable regulatory requirements. Specifically, we may collect your full name, date of birth, physical address, and an image of your government-issued photo identification for age-verification purposes.
- We may also receive Personal Information about you from other sources with which you have registered, companies who we have partnered with, and third-party providers in order to better tailor our products and services to you. Information we collect relates to your interests and demographic information.

### **Why do we collect personal information and how is it used?**

- We use information that you provide to us to process any purchase you make.
- We also use the information you provide to us to respond to any communications that you send to us, and also to communicate with you about our products, the Service, your orders and your account.
- The information we collect about how you use our Service and read our emails is used in aggregate and de-identified form to operate, maintain, evaluate and improve our Service, send push notifications, and enhance your experience

when visiting our Website (including, without limitation, keeping your preferences and items placed in your shopping cart between visits).

- We also use the information that we collect for product development and internal analytics purposes.
- We use analytics data that we collect through our Website to provide personalized content and information and targeted advertising. We also use information about you that we obtain from social media sites to deliver targeted advertisements to you.
- We also use the information that we collect information from social networking sites in order to display you as a friend or in association with your profile and connections.

### **Is personal information shared or disclosed?**

- We share information with our affiliates, including JUUL Labs, Inc., which use the information in the same manner and for the same purposes that we use the information.
- We share information with third party online advertising networks so that they can deliver advertisements to you for products and services that may reflect your interests. Information we share include cookies and your IP address. Cookies collect information including hashed data, click stream information, browser type, device type, time, and date you visited the Website.
- We share your name and email address with third parties whose promotional messages you have opted-in to receive.
- We also use certain service providers who will have access to some of the information we collect, and we may disclose certain information if we sell our business or combine with another business.
- Also, if you post content to any public area of our externally facing platforms, this information will be visible to the public and we may publish this information on our Website and social media pages along with some of your personal information such as your first name, last initial, and province of residence.
- Your information may also be disclosed where permitted or required by law.

### **What are the risks?**

- Although we take steps to safeguard the personal information under our control, "perfect security" does not exist online. We cannot guarantee the security of information posted or transmitted using the Service. It is possible that third parties may unlawfully intercept or access such information.
- If you choose to disclose personal information when posting comments or other information or content on the Service, this information is publicly available and may be collected, used and re-posted by others, including people outside the JUUL Labs community. We cannot control distribution of content that you post on the Website or through the App.

### **What are your choices?**

- You can contact us for customer service issues via telephone instead of by email or through the App customer service link. However, calls to customer service may be recorded to help improve our products or services and we may collect specific information related to your customer service issue, your name, and your contact information.
- You can delete your account and/or delete the App from your device at any time. We may keep your information (but not use it) for a certain period of time to protect our rights and interests.
- You can opt-in to the Usage Recording Feature of our App, in which case we will collect certain information to enhance the functioning of the App (e.g., paring information, log files, modes, settings, durations, error rates, etc.). This feature does not collect any personal information, and none of the information that is collected will be combined with any personal information we may have about you.
- You can choose whether or not you want to receive promotional emails.
- You can withdraw your consent to our continued use of your personal information, subject to any legal or contractual restrictions.

### **What else should you know?**

- We permit third party online advertising networks and other third party services, to collect information about your use of our Service so that they may play or display ads that may be relevant to your interests.

- We have relationships with other websites, such as social media sites, which allow us to collect information about your use of those sites and deliver our advertisements to you on those sites.
- We transfer information to be used and stored in the United States. This means that the information may be accessible to courts, law enforcement and national security authorities in the U.S.
- JUUL Labs reserves the right to amend this Privacy Policy. See the section captioned “Changes to this Privacy Policy” below for more information.

# 1. Information Collected

JUUL Labs holds our customer base in the highest regards and is dedicated to providing the best experience on our Service. In order to offer an enjoyable and premium experience on our Website, we collect information which can personally identify you (e.g., name, address and email) and information that is about you but that does not identify you individually (e.g., aggregate information on the number and frequency of visits to various pages of the Website). The categories of information we collect can include:

## **Information that you provide to us**

We may collect personal information that you provide to us directly, such as your name, phone number, location, payment information, and e-mail address when you register on our Website, purchase a product, sign up for our Newsletter mailing list, or otherwise communicate with us (e.g., via customer service). Account creation is required when purchasing products from the Website. We may also collect any communications between you and JUUL Labs and any other information you provide to JUUL Labs. If you download and use our mobile App to access the Service, the App does not require you to enter any personally identifiable information, though you may voluntarily provide information to us through the App, for example, when you contact us through the App’s customer service link and provide to us your name, email address and any information you choose to include in the text of your message.

We use this information to operate, maintain, and provide to you the features and

functionality of the Website, as well as to communicate directly with you, such as to send you email messages. We may also send you service-related emails or messages (e.g., account verification, change or updates to features of the Website, technical and security notices).

### **Information automatically collected**

We and our third party partners, automatically collect certain types of usage information when you visit our Website, use our Service, read our emails, or otherwise engage with us. We typically collect this information through a variety of tracking technologies, including cookies, web beacons, file information and similar technologies (collectively, “tracking technologies”). For example, we may collect information such as your domain name, browser type, operating system, IP address, web pages viewed while visiting our site, links clicked, length of time spent on our Service, and reference website from which you accessed the Website. We may collect analytics data, or use third-party analytics tools, to help us measure traffic and usage trends for the Website and to understand more about the demographics of our users. In gathering this information we are able to enhance your experience when visiting our Website (including keeping your preferences and items placed in your shopping cart between visits) and to provide custom, personalized content and information, including targeted content and advertising. These cookies do not contain or track sensitive information such as your payment information. You may set your browser to not accept cookies; however, some features of the Website may not function properly without the use of cookies. Although we do our best to honor the privacy preferences of our users, we are unable to respond to Do Not Track signals set by your browser at this time.

If you download and use a mobile App to access our Service, we automatically collect certain types of information about your device and usage in several ways.

When you download and use the App, JUUL Labs will automatically receive certain information, about which JUUL Labs products that are connected to the App, your mobile device and your usage of the App, such as the device operating system and version and information regarding your use of the App, such as the time spent using the App, which features of the App you access and use, and error messages but not specific identifying information about you. JUUL Labs may modify the information that it receives from the App at any time and will provide you notice of such changes by alerting you of a change to the Privacy Policy.

The App may store information regarding usage of a compatible JUUL Labs device that you have linked to the App when the App is running or when a compatible JUUL

Labs product is available to pair with the App. Such information may include identification and pairing information to connect with a JUUL Labs product, log files, modes, settings, durations, error rates, and other information that may be useful to enhance the connectivity between a compatible JUUL Labs product and the App. We do not link this Device Usage information to your personal information in our systems and this information is transmitted in an anonymous form and in an encrypted manner. If you do not opt-in to the Usage Recording Feature, the App will not collect any device usage information. If you do opt-in and choose to save certain settings or save user profiles in a durable, continuing manner for future sessions regardless of JUUL Labs product, this information may be retained by JUUL Labs.

## 2. Use of Information Collected

We use the information that we collect to operate, maintain, and provide to you the features and functionality of the Website, as well as to communicate directly with you, such as to send you email messages.

More specifically, information collected helps our efforts to advance our customers' and visitors' online experience when visiting our Service. This ranges from accessibility, improving content, customer service, shopping checkout experience and overall Service satisfaction. We also use information we collect to assist with product development efforts, response to mandated legal notices, process purchases on the Website, to provide you with products or services you request from us, to improve your overall experience with the Service, for internal analytics purposes, to troubleshoot technical difficulties and errors, to notify you about changes to our Service. We may also send you service-related emails or messages (e.g., account verification, change or updates to features of the Website, technical and security notices).

Your information will be accessible by JUUL Canada, Ltd., JUUL Labs, Inc., MailChimp, and other third parties, including their employees in digital, marketing, sales, and legal, who have a need to know such information to perform their duties.

If we intend to use your information in any other way, we will describe the purpose to you at the time you provide the information.

## 3. Sharing of Information Collected

We may share your personal information with:

\* Third-party vendors, service providers, contractors and agents that perform services on our behalf, as needed to carry out their work for us, which may include identifying and serving advertisements, providing mailing services, providing financial services, web hosting, providing analytic services, age verification, and processing payments. This sharing is only done so when those entities are performing functions solely on our behalf and they are not permitted to store such information except as needed to perform our work or as required by law;

\* When you post content to any public area of our externally facing platforms, including social media pages or blog, this information may be visible to the public and we may publish this information on our website and social media pages along with some of your personal information such as your first name, last initial, and province of residence;

\* With your consent, to third parties who may send you offers and information about products and services we think you may enjoy;

\* Other companies and brands owned or controlled by JUUL Labs and other companies owned by or under common ownership as JUUL Labs, which also includes our subsidiaries (i.e., any organization we own or control) or our ultimate holding company (i.e., any organization that owns or controls us) and any subsidiaries it owns. These companies will use your personal information in the same way as we can under this Privacy Policy;

\* Other parties in connection with a company transaction, such as a merger, corporate restructuring, sale of company assets or shares, reorganization, financing, change of control or acquisition of all or a portion of our business by another company or third party, or in the event of a bankruptcy or related or similar proceedings; and

\* Third parties as required by law or subpoena or if we reasonably believe that such action is necessary to (a) comply with the law and the reasonable requests of law enforcement; (b) to enforce our Terms of Service or to protect the security or integrity of our Service; and/or (c) to exercise, investigate, or protect the rights, property, or personal safety of JUUL Labs, our visitors, or others.

We may also share information with others in an aggregated or otherwise anonymized form that cannot be linked back to you as an individual directly, or indirectly, in any form.

PLEASE NOTE: The products sold on this website are highly regulated by various



governing agencies. It may become necessary to share the information that we collect with such agencies to comply with laws, a judicial proceeding, court order, or other legal requests.

We also may disclose information that has been collected where we believe it is necessary to investigate, prevent, or take action regarding underage use or purchase of JUUL Products, illegal activities, suspected fraud and/or counterfeit, situations involving potential threats to the safety of any person, violations of our Terms of Service or Privacy Policy, or as evidence in litigation in which JUUL Labs is involved.

## 4. Age Verification

The products that we sell on our Website are highly regulated and age-restricted. We are required and committed to preventing sales to anyone under the legal purchasing age. We will only send you marketing materials and information that encourage or facilitate a purchase of our products after you have certified that 1) you are of legal purchasing age for the product you wish to purchase; 2) that you wish to be added to our mailing list for the purpose of receiving transactional offers and advertising from a tobacco-regulated company; and 3) that you understand that providing false information may constitute a violation of the law.

Before you can make a purchase from a product specific newsletter mailing list, we will verify your age through a non-affiliated third party company to perform an age and identify verification check for adherence to this requirement. We utilize these trusted verification services to verify the information that you provide and ensure that you qualify to access and purchase products from the Website. This process has been developed with the customer's privacy in mind with detailed information neither shared nor accessible.

In some cases, we might not be able to verify your age and/or identity through their verification service. If you are unable to verify your age with the requested information, you will be requested to upload a copy of your government ID that our team can manually verify your date of birth. Photo ID's are uploaded to our third party partner's secure database and we simply process the result that they provide – we do not receive a file with your ID to be stored on our servers or database.

## 5. Third Party Tracking and Online Advertising

We may share, or we may permit third party online advertising networks and other third party services, to collect, information about your use of our Service over time so that they may play or display ads that may be relevant to your interests on our Service as well as on other websites or apps. Additionally, the Website may utilize third party sites to provide content to JUUL Labs customers such as social media features. These third party sites may set cookies on your browser and/or obtain your IP address. Typically, though not always, the information we share is provided through cookies or similar tracking technologies, which recognize the device you are using and collect information, including hashed data, click stream information, browser type, time and date you visited the Website, and other information. This information is used to display targeted ads on or through our Service or on other websites or apps, including on Facebook. We or the online advertising networks use this information to make the advertisements you see online more relevant to your interests. As noted above, depending on your browser or mobile device, you may be able set your browser to delete or notify you of cookies and other tracking technology by actively managing the settings on your browser or mobile device. We do not permit third parties to collect your identifiable information from the Website unless you provide it to them directly.

### **Information Collected Via Technology**

As you use JUUL Labs, certain information may also be passively collected and stored on our or our service providers' server logs, including your Internet protocol address, browser type, and operating system. We also use Cookies and navigational data like Uniform Resource Locators (URL) to gather information regarding the date and time of your visit and the solutions and information for which you searched and viewed, or on which of the advertisements displayed on JUUL Labs you clicked. This type of information is collected to make JUUL Labs and solutions more useful to you and to tailor the experience with JUUL Labs to meet your special interests and needs.

An "Internet protocol address" or "IP Address" is a number that is automatically assigned to your computer when you use the Internet. In some cases your IP Address stays the same from browser session to browser session; but if you use a consumer internet access provider, your IP Address probably varies from session to session. For example, we, or our service providers, may track your IP Address when you access JUUL Labs to assist with ad targeting.

"Cookies" are small pieces of information that a website sends to your computer's hard drive while you are viewing a website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive

experience with JUUL Labs. Persistent Cookies can be removed by following your Internet browser help file directions. In order to use our services offered through JUUL Labs, your web browser must accept Cookies. If you choose to disable Cookies, some aspects of JUUL Labs may not work properly, and you will not be able to receive our services.

To learn more about interest-based advertising and how you may be able to opt-out of some of this advertising, you may wish to visit the Network Advertising Initiative's online resources, at <http://www.networkadvertising.org/choices>, and/or the DAA's resources at [www.aboutads.info/choices](http://www.aboutads.info/choices), and you may also adjust your ad preferences through your Facebook settings.

## 6. Rights & Choices with Respect to Your Data

### **Modifying or deleting your information**

Subject to certain permissible exceptions under applicable laws, you can generally review, modify, correct, or delete your information, or remove your name or comments from our Website or publicly displayed content, by contacting us directly at [legal@juullabs.com](mailto:legal@juullabs.com).

### **Opt-out of App's Usage Recording Feature**

If you elect to opt-in to our App's Usage Recording Feature at time of download, you may always later opt-out by turning the feature off in the App's settings menu, or you may delete the App from your device.

### **Controlling your communications preferences**

You do not have to consent to receiving promotional messages in order to use our Service. In fact, certain messages will not be sent to you unless you provide explicit consent (e.g., promotional messages from third parties).

You can also stop receiving promotional email communications from us at any time by clicking on the "unsubscribe link" provided in such communications. We make every effort to promptly process all unsubscribe requests. You may not opt out of product or service-related communications (e.g., account verification, transactional communications, changes/updates to features of the service, technical and security notices).

## Access and Rectification

You also have the right to access, update and/or correct your personal information, subject to any permissible or required exceptions under applicable law.

## 7. Children's Privacy

Our Service is not intended for individuals under the age of 19 and for warranty, the age of 18. We do not knowingly collect or solicit any information from anyone under the age of 13 on this Service. In the event that we learn that we have inadvertently collected personal information from a child under age 13, we will delete that information as quickly as possible. If you believe that we might have any information from a child under 13, please contact us at [legal@juul.com](mailto:legal@juul.com). Protecting the privacy of children and youth is very important to us. Thus, if we obtain actual knowledge that a user is under 19, we will take steps to remove that user's Personal Information from our databases. We recommend that anyone under the age of 13 obtain their parent's permission before submitting information over the internet.

## 8. Transferring Data Outside Canada

Your information collected through our Service may be stored and processed in the United States or any other country in which JUUL Labs or its affiliates or service providers maintain facilities. Please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as Canada, and such information may be accessible to courts, law enforcement and national authorities in the jurisdiction(s) where it is stored. If you do not want your information to be transferred or stored outside Canada, you should not provide us with any personal information.

## 9. Third Party Website

Our Service may contain links to websites operated by third parties. This Privacy Policy does not apply to these third party websites or services. If you follow a link to any of these websites, please note that these websites have their own privacy policies and terms & conditions and that we do not accept any responsibility or liability for their policies. Links should be clicked at your own risk, and it is your sole responsibility to review the applicable privacy policy and terms and conditions of any third party website accessed.

## 10. Security

We take the security of your information seriously and employ physical, administrative, and technological safeguards designed to preserve the integrity and security of all information collected through our Service. Our Service supports the industry standard Secure Socket Layer (SSL) encryption which is applied to all data transmitted so it cannot be read by others. In addition, if you are using a shared computer to access the Website, we recommend that you log out of your account before ending your browser session. This will also decrease the risk that your account will not be used by anyone other than yourself. Unfortunately, the transmission of information online is not completely secure. Although we do our best to protect all information collected through the Service, we cannot guarantee the security of your information collected and/or transmitted through the Service. Any transmission of information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide.

## 11. Partner Technology and SMS Privacy Policy

We collect information in the form of the content that you submit during your use of JUUL Labs, such as photos, comments, ratings and other information you choose to submit. We may also collect information about you and your friends, from any social network you may have connected from, in order to provide you with a more personalized experience. For instance, we may collect your user ID or profile information that you have permitted to be displayed through JUUL Labs in order to display you as a friend or in association with your profile and connections. When you order our products or services, you will need to submit your credit card or other payment information so that our service providers can process your payment for those products and services. If you choose to sign up to receive information about products or services that may be of interest to you, we will collect your email address and all related information. Additionally, we collect any information that you voluntarily enter, including Personal Information, into any postings, comments, or forums within the JUUL Labs community. For each of these Personal Information collections (or any below), we will ask for your consent and provide you with clarity before making any such collections. Additionally, you will have the option to opt out of any of these collections at any time and we will stop collecting such data from you.

### **Personal Information from Other Sources**

We may receive Personal Information about you from other sources with which you have registered, companies who we have partnered with (collectively, “Partners”) or other third parties. The types of information we can receive include your name, address, cookies, and your IP address. Cookies may contain information related to the device you are using and also collect information including hashed data, click stream information, browser type, time, and date you visited the Website. We may associate this information with the other Personal Information we have collected about you.

## **E-mail and E-mail Addresses**

If you send an e-mail to us, or fill out our “Feedback” form through JUUL Labs, we will collect your e-mail address and the full content of your e-mail, including attached files, and other information you provide. We may use and display your full name and email address when you send an email notification to a friend through JUUL Labs or the social network from which you have connected to JUUL Labs (such as in an invitation, or when sharing your content). Additionally, we use your email address to contact you on behalf of your friends (such as when someone sends you a personal message) or notifications from a social network or other website with whom you have registered to receive such notifications. We may use this e-mail address to contact you, for things such as notifications of limited edition shop sales and other related information. You may indicate your preference to stop receiving further promotional communications as further detailed below.

You understand that when you use JUUL Labs, certain information you post or provide through JUUL Labs, such as your name, profile, comments, posts and ratings, may be shared with other users and posted on publicly available portions of JUUL Labs, including without limitation, chatrooms, bulletin and message boards, along with other public forums. Please keep in mind that if you choose to disclose Personal Information when posting comments or other information or content through JUUL Labs, this information may become publicly available and may be collected and used by others, including people outside the JUUL Labs community. We will not have any obligations with respect to any information that you post to parts of JUUL Labs available to others, and recommend that you use caution when giving out personal information to others in public forums online or otherwise. We also share the information you publish with other third parties.

## **SMS Terms of Service**

1. Only when you opt-in to the service, we will send you an SMS message to confirm your signup.

You can cancel the SMS service at any time. Just reply “STOP”. After you send the SMS message “STOP” to us, we will send you an SMS message to confirm that you have been unsubscribed. After this, you will no longer receive SMS messages from us.

If you want to join again, just sign up as you did the first time and we will start sending SMS messages to you again.

As always, message and data rates may apply for any messages sent to you from us and to us from you. If you have any questions about your text plan or data plan, it is best to contact your wireless provider.

As with any of its programs, JUUL Labs, Inc. may discontinue this program at any time and without out notice to you.

## 12. Changes to this Privacy Policy

We may modify or update this Privacy Policy from time to time to reflect the changes in our business and practices, and so you should review this page periodically. When we change the Privacy Policy in a material manner we will let you know and update the date at the top of this page. If you object to any changes, you may close your account. Continuing to use our Service after we publish changes to this Privacy Policy means that you are consenting to the changes.

## 13. Contact Us

If you have any questions about this Privacy Policy, please contact our legal and compliance department at [legal@juul.com](mailto:legal@juul.com) or +1-844-250-1032.

Without limiting the above, you can contact us if:

- You wish to access, correct and/or update your personal information.
- You wish to withdraw your consent to the continued use of your personal information.
- You would like further information about the processing of your personal information by our service providers (including affiliates) outside Canada.
- You have any concerns or complaint about our processing of your personal information.