

TERRANUEVA PHARMA CORPORATION, PLEDGES TO KEEP THE ACCURACY, CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION. THIS PRIVACY POLICY DESCRIBES WHAT INFORMATION WE COLLECTS FROM OR ABOUT YOU, AS WELL AS HOW WE WILL USE IT AND TO WHOM WE MAY DISCLOSE IT. PLEASE READ THIS ENTIRE DOCUMENT CAREFULLY.

PRIVACY POLICY EFFECTIVE FOR CANADA

This Privacy Policy covers only those activities that are subject to the provisions of Canada's federal and provincial privacy and health information laws, as applicable.

This Privacy Policy has a limited scope and application. Therefore, the rights and obligations written in this Privacy Policy may not be available to all individuals or in all jurisdictions.

WHAT IS PERSONAL INFORMATION?

Within this Privacy Policy, "personal information" is any information about an identifiable individual, other than an individual's business contact information when collected, used or disclosed for the purpose of enabling the individual to be contacted in relation to their business responsibilities. This definition would include, among other things, information about the physical or mental health of an individual.

WHAT PERSONAL INFORMATION DO WE COLLECT?

We collect and maintain different types of personal information in respect of the individuals with whom we interact. This includes:

- contact and identification information, such as your name, address, telephone number, e-mail address, date of birth, and gender;
- personal information in connection with your request for certain products or services that you seek from us;
- additional service-related information concerning the products or services that we provide to, or receive from, you; and
- business relationship information, including information related to your agreements, preferences, advisors, and suppliers, feedback and information requested by or provided to you.

We may also collect market-related information, which may include personal information, concerning market trends and activities impacting Terranueva Pharma Corporation. We may also collect information related to our media, investors and public relations activities.

We will generally collect personal information directly from you. If the personal information what we collect is held by a third party, we will ask your permission before collecting it (such permission may be given directly by you, or implied from your actions).

From time to time, we may collaborate with third parties and may also receive personal information collected by those third parties. Where this is the case, we will take all reasonable steps to make sure that the third parties have the right to disclose your personal information to us.

Medicinal cannabis

Our operations will include activities related to: (i) operating cannabis production facilities; (ii) distributing medicinal cannabis to individuals managing certain medical conditions; and (iii) educating our stakeholders (including patients, healthcare practitioners, investors and governments) about the benefits of medicinal cannabis

For example, in order for us to provide you with medicinal cannabis, we will need you to provide us with: (i) a document known as a “Medical Document” from an authorized healthcare practitioner; as well as (ii) a consent form.

A Medical Document should include the following information: (i) your healthcare practitioner’s name, profession, business address, telephone, fax, email address, province of registration and registration number; (ii) your name, date of birth and location of consultation; and (iii) dosage information (daily quantity and period of use). Your healthcare practitioner also has the option to provide us with your diagnosis and additional comments.

A consent form, on the other hand, is needed for us to verify the information in your Medical Document with your healthcare practitioner (who completed your Medical Document). The information that we collect through this form includes: (i) your name (and if applicable, the name of your substitute decision maker); (ii) your address, telephone, fax and email address; and the name of your healthcare practitioner.

Healthcare Practitioners

Information we collect about healthcare practitioners may be used to comply with our legal and regulatory requirements, including, for example, verification of the information provided on Medical Documents. We may also be required to disclose the information to the relevant licensing authority governing the practice of the profession.

Terranueva’s Website

We may collect information related to your visit on our website, such as the IP address and domain used to access our website, the type and version of your browser, the website you came from to access our website, the page you entered and exited at, any website page within our website that is viewed by that IP address and what country you are from. We use this information to check on our website’s performance and to constantly optimize our website.

We may place a “cookie” on the hard drive of your computer to track your visit. A cookie is a small data file that is transferred to your hard drive through your web browser that can only be read by the website that placed the cookie on your hard drive. The cookie acts as an identification card and allows us to identify you and to record your passwords and preferences. It lets us track your visit so we may better understand you and tailor our website to your needs. However, should you wish to disable the cookie or be notified of its presence, you may do so on most web browsers. It should be noted that, should you disable cookies, the performance of our website may be affected.

We cannot assume the responsibility for the privacy practices, policies or actions of people operating websites that may be linked from ours. You should review the privacy policies of these websites before providing them with personal information.

Terranueva’s Newsletter

When you use our website, you may decide to subscribe to our newsletter and add your email to our email list that will be used to contact you occasionally with information that we feel will be of interest to you.

By subscribing to the newsletter and providing your registrant information, you consent and agree to:

- Terranueva Pharma Corporation’s collection and use of your personal information to administer the newsletter;
- Terranueva Pharma Corporation’s use of your personal information to contact you to keep you informed about our next milestones in the cannabis industry or any of our recent developments.

If you do not want Terranueva Pharma Corporation to contact you with the newsletter, all emails sent to you contain simple instructions telling you how to “unsubscribe”.

WHY DO WE COLLECT PERSONAL INFORMATION?

Terranueva Pharma Corporation collects personal information to enable us to manage, maintain, and develop our operations, including for example:

- to establish, maintain and manage our relationship with you. This allows us to provide you with the product and services that you have requested;
- to enable you to register and access an account with us;
- to be able to review the products and services that we provide to you so that we may: (i) understand your requirements for our products and services; and (ii) work to improve our products and services;
- to be able to review the products and services that we obtain from you so that we may work with you and so that you may understand our requirements for such products and services;
- to be able to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number);
- to enable us to comply with applicable law or regulatory process; and
- any other reasonable purpose to which you consent.

Terranueva Pharma Corporation, when in operation, may collect personal information (including personal health information) in connection with the provision of health care services (“**Healthcare Services**”), which includes:

- dispensing medicinal cannabis to you;
- giving you knowledge, information and counseling in connection with such services;
- assisting physicians and other healthcare professionals as needed;
- responding to requests made by, or on behalf of, your insurance provider to review your insurance claim(s), to the extent applicable;
- recommending products, services, programs or events to manage your healthcare needs;
- managing your patient record, including medical marijuana dispensed and services provided;
- obtaining and processing payments for the medicinal marijuana dispensed to you;
- monitoring and investigating incidents and managing claims;
- if requested, referring you to other healthcare providers; and
- performing obligations in accordance with, or complying with, applicable healthcare-related professional, legal or regulatory requirements.

HOW DO WE USE YOUR PERSONAL INFORMATION?

We may use your personal information:

- as permitted or required by applicable law or regulatory requirements;
- for the purposes described in this Privacy Policy; and

- for any additional purposes for which we have obtained your consent to the use or disclosure of your personal information.

We may also use information we collect about you in the aggregate for statistical purposes, for example to identify the demographics of our clients, the types of diagnoses that our clients are using medical marijuana to treat, and the types of strains that are most beneficial for different diagnoses. We may publish and/or disclose aggregate statistics to third parties but never any identifiable personal information (except in accordance with this Policy).

Please note: We may provide you with ways to interact with other. You are solely responsible for the User Generated Content that you post on our platforms. Unless explicitly stated otherwise, any User Generated Content that you post onto our website (including your username) will be made publicly available. As such, should you wish to remain anonymous, we advise you not to post any personal information.

DO WE EVER DISCLOSE YOUR PERSONAL INFORMATION?

When we provide you with Healthcare Services, we may share your personal information (including your personal health information) with your healthcare providers (which may also be referred to as your “circle of care”) and your authorized family members. Other disclosure will only be done with your consent or if permitted by law. For example, people who have authority to collect information (parents, caregiver, etc) may be allowed to receive your information.

We may also share your personal information with our employees, contractors, consultants, affiliates and other parties 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.

Finally, your personal information may be disclosed:

- for the purposes described in this Privacy Policy;
- as part of an audit by the Minister of Health;
- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- as part of the regular reporting activities of Terranueva Pharma Corporation and its affiliates;
- during emergency situations or where necessary to protect the safety of a person or group of persons; and
- with your consent.

THE IMPORTANCE OF CONSENT

It is important to us that we collect, use or disclose your personal information where we have your consent to do so. Depending on the sensitivity of the personal information, your consent may be implied, deemed (using an opt-out mechanism) or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you enter into an agreement with us, we will assume your consent to the collection, use and disclosure of your personal information for purposes related to the performance of that agreement and for any other purposes identified to you at the relevant time.

Typically, we will seek your consent at the time that we collect your personal information. In certain circumstances, your consent may be obtained after collection but prior to our use or disclosure of your personal information. If we plan to use or disclose your personal information for a purpose not previously identified (either in this Privacy Policy or separately), we will let you know of that purpose before such use or disclosure.

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.

You may change or withdraw your consent at any time, subject to legal or contractual obligations and reasonable notice, by contacting us. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our COO.

We assume that, unless you advise us otherwise, you have consented to the collection, use and disclosure of your personal information as explained in this Privacy Policy.

PROTECTION OF PERSONAL DATA

Terranueva Pharma Corporation will endeavor to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to prevent your personal information from loss and unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction

ACCESS TO YOUR PERSONAL INFORMATION

You can ask to see your personal information. If you want to review, verify or correct your personal information, please contact us. Please note that any such communication must be in writing.

When requesting access to your personal information, please note that we may request specific information from you to enable us to confirm your identity and right to access, as well as to search for and provide you with the personal information that we hold about you. We may charge you a fee to access your personal information; however, we will advise you of any fee in advance. If you require assistance in preparing your request, please contact us.

Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you. In addition, the personal information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices. In the event that we cannot provide you with access to your personal information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

INQUIRIES OR CONCERNS?

If you have any questions about this Privacy Policy or concerns about how we manage your information, please contact us by e-mail. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you.

REVISIONS TO THIS PRIVACY POLICY

Terranueva Pharma Corporation, from time to time, may make changes to this Privacy Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your personal information. We will post any revised version of this Privacy Policy on our website, and we encourage you to refer back to it on a regular basis.

This Privacy Policy was last updated on July 24, 2018