

Privacy Policy

Acreage Holdings, Inc. and its affiliates (hereinafter referred to as “Acreage” “us,” “we,” “our,” or “Company”) have created the following Privacy Policy for when you visit our website at www.acreageholdings.com (“Website”) and any other services where this Privacy Policy is posted (collectively, our “Services”). This Privacy Policy describes, among other things, how Acreage collects and uses your information when visiting our Website or using our Services. By using our Services, you consent to this Privacy Policy and to the changes posted here from time to time.

This Privacy Policy does not apply to information collected or obtained by any third party, including through any application or content that may link to or be accessible from or on the Services. This Privacy Policy is integrated into our [Terms and Conditions of Use](#), which is also available on our Website. If there are any inconsistencies between our Privacy Policy and the Terms and Conditions of Use, the Privacy Policy controls.

If you are a California resident, please see Section VIII below for your California privacy rights, which supplements the Privacy Policy as to California Residents only.

I. INFORMATION WE COLLECT ABOUT YOU

In order to access our Services or to respond to specific inquiries, Acreage may collect the following types of information: (A) Information You Provide to Us, (B) Information We Automatically Collect, (C) Information We Receive from Third Parties. All of the information listed in (A)-(C) above, are detailed below, and hereinafter to as “Information.”

A. Information You Provide to Us

In using our Services, you may provide us with information, including, without limitation

- First and Last Name;
- Email;
- Unique identifier and password if you choose to create an account;
- Age Verification;
- Zip Code.
- IP Address

B. Information We Automatically Collect

Acreage also collects Information about you from your visit to our Services including:

- IP address, which is the number associated with the service through which you access the Internet, like your ISP (Internet service provider), your company, or your university;
- Your geographic location and time zone;
- Your response to the age verification request;
- Date and time of your visit;
- Your device, type of computer, web browsers, search engine used, operating system, or platform you use or web browser;

- Domain server;
- Cookies that are installed on your device;
- Data identifying the web pages you visited prior to and after visiting our Services; and/or
- Information about the individual web pages or products that you view, what websites or search terms referred you to the Services, and information about how you interact with the Services.

Cookies & Other Technologies Used to Collect Information About You

We collect the above Information directly and through the use of third parties. We collect this Information by using certain technologies, such as cookies, session variables, web beacons, and other technologies. Third-party service providers, advertisers, and/or partners may also view, edit, or set their own cookies or place web beacons.

- “Cookies” are small digital files that are transferred to your computer or smartphone’s hard drive when you visit a website or click on a URL. Cookies allow us to operate and personalize the Services, assist with functionality of the Website, to track your usage, and to deliver targeted advertisements to you. “Cookies are not linked to your name or address. Once you close your Web browser, the Cookie terminates. If you reject the Cookie, you may still use the Services.
 - Most web browsers automatically accept cookies unless you have configured yours not to accept them. You can program your browser not to accept cookies, but if you do, you may not be able to use certain portions of the Services and the Website will not be able to customize certain functions according to your preferences.
 - Cookies are placed on the Services, but executed by third parties such as Google, Bing, Facebook, and other ad networks. For more information about third-party cookies and related advertising and how to opt out of these practices with companies participating in industry self-regulation, please visit About Ads at <http://optout.aboutads.info/>.
- “Web Beacons/Pixels” are graphic images or web programming code that may be included on the Website to help us count visitors to the Website, monitor how you navigate the Website or to count how many particular links posted on the Website were actually viewed.
- Our Services uses retargeting pixels from Google, Facebook, and other ad networks. See Opting Out of Direct Marketing from Third Parties below. Please visit their websites for their privacy policies and consent and opt-out mechanisms or visit sites that may help block ad tracking and data collection (e.g., IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps).
- “Analytics” are tools we use, such as Google Analytics, to help provide us with information about traffic to our Services. These services use the data collected to track and monitor the use of our Services (e.g., advertising cookies and anonymous identifiers), which it shares with other services and websites who use the collected data to contextualize and personalize the ads of its own advertising network. These services may also include any of the following Google Analytics features: Demographics and Interest reporting, Google Tags, Remarketing, GDN Impression Reporting and Double Click Campaign Manager.
- “Mobile Application Technologies” and mobile devices may automatically provide us with information about your device, your phone number, and your physical location if you access our Services through a mobile device.

C. Information from E-Commerce Partners

Personal Information collected from consumers on the Website is stored in electronic form by Acreage’s e-commerce merchants and fulfillment partners. If you are a consumer who places a pre-purchase order on

www.acreageholdings.com, we will collect Information from you (including your name, date of birth, email address, mobile phone number, etc.). We may also maintain and or track a record of your product purchases.

D. Information We May Receive from Third Parties

We may collect additional Information about you from third-party websites, social media platforms, such as, but not limited to Facebook and Instagram (“Social Media Platforms”), and/or sources providing publicly available information (e.g., from the U.S. Postal Service) to help us provide services to you, help prevent fraud, and for marketing and advertising purposes.

Information we may access about you, with your consent, may include, but is not limited to, your basic Social Media Platform information, your location data, your list of contacts, friends or followers and certain information about your activities on the Social Media Platform. Please keep in mind that when you provide Information to us on a third-party website or platform, the Information you provide may be separately collected by the third-party website or the Social Media Platform.

The Information we collect is covered by this Privacy Policy, and the Information the third-party website or Social Media Platform collects is subject to the third-party website or platform’s privacy policies. We encourage you to be aware when you leave our sites or applications and to read the privacy policies of other sites that may collect your Information.

II. HOW WE USE YOUR INFORMATION

A. Use and Purpose of Processing Your Information

We use and process your Information for things that may include, but are not limited to, the following:

- To provide you with the Services and related products, promotions, newsletters, and information you request;
- To process transactions you make through or in connection with the Services;
- To respond to your inquiries and provide you with requested information and other communications, including by email or text messages, and including alerts, notification of promotions, contests, and events;
- To verify your response to the age verification inquiry upon entry to the Services;
- For general or targeted marketing and advertising purposes, including sending you promotional material or special offers on our behalf or on behalf of our marketing partners and/or their respective affiliates and subsidiaries and other third parties, provided that you have not already opted out of receiving such communications;
- To fulfill contracts we have with you;
- To manage, improve and foster relationships with third-party service providers, including vendors, suppliers, and parents, affiliates, subsidiaries, and business partners;
- Maintain, improve, customize, or administer the Services, perform business analyses, or other internal purposes to improve the quality of our business, the Services, resolve technical problems, or improve security or develop other products and services;
- Comply with our Terms and Conditions of Use;
- Analytics for business purposes and business intelligence;
- Comply with any applicable laws and regulations and respond to lawful requests; and/or

- For any other purposes disclosed to you at the time we collect your Information and/or pursuant to your consent.

We may also use Information that has been de-identified and/or aggregated for purposes not otherwise listed above.

B. Sharing Your Information

We may share your Information as set forth in the Privacy Policy and in the following circumstances:

- **Third-Party Service Providers.** We may share your Information with third-party service providers that perform certain functions or services on our behalf (such as to host the Services, fulfill orders, provide products and services, manage databases, perform analyses, process credit card payments, provide customer service, or send communications for us). These third-party service providers are authorized to use your Information only as necessary to provide these services to us. In some instances, we may aggregate Information we collect so third parties do not have access to your Information to identify you individually.
- **Disclosure of Information for Legal and Administrative Reasons.** We may disclose your Information without notice: (i) when required by law or to comply with a court order, subpoena, search warrant, or other legal process; (ii) to cooperate or undertake an internal or external investigation or audit; (iii) to comply with legal, regulatory or administrative requirements of governmental authorities (including, without limitation, requests from the governmental agency authorities to view your Information); (iv) to protect and defend the rights, property or safety of us, our subsidiaries and affiliates and any of their officers, directors, employees, attorneys, agents, contractors and partners, and the Service users; (v) to enforce or apply our Terms & Conditions; and (vi) to verify the identity of the user of our Services.
- **Business Transfers.** Your Information may be transferred, sold, or otherwise conveyed (“Conveyed”) to a third party where we: (i) merge with or are acquired by another business entity; (ii) sell all or substantially all of our assets; (iii) are adjudicated bankrupt; or (iv) are liquidated or otherwise reorganize. You agree to any and all such Conveyances of your Information.
- **Information Shared with our Subsidiaries and Affiliates.** We may share your Information with our subsidiaries and affiliates. If you do not want us to share your Information with your subsidiaries and affiliates, please email us at media@acreageholdings.com.
- **Online Communications (Chat Feature, Forums, Contests, Message Boards).** If you correspond with us by email, text message, online chat feature, questionnaires, surveys, social media, or other digital online platform, we may retain such correspondence and the Information contained in it and use it to respond to your inquiry. Our Services may include chat features, forums, and message boards that are available to you and other users. You are not required to provide any Information when using these areas, but you may choose to do so. If you post Information online, you agree you have no expectation of privacy concerning that Information, that it will be publicly available and that you may receive unsolicited messages from other parties. We cannot ensure the security of any Information you choose to make public in a chat room, forum, or message board. Also, we cannot ensure that parties who have access to such publicly available Information will respect your privacy. Please exercise caution when deciding to disclose Information in these areas. To request removal of your Information from our blog or community forum, contact us at media@acreageholdings.com. In some cases, we may not be able to remove your Information, in which case we will let you know if we are unable to do so and why.

- **De-Identified or Aggregated Data.** We may share your Information on an aggregated basis for any purpose in which your specific Information is blinded, masked, or otherwise not identifiable.
- **With Your Consent.** We may share Information consistent with this Privacy Policy with your consent.

III. LINKS TO OTHER WEBSITES

Our Services may contain links to other websites or services that are not owned or controlled by us, including links to Social Media Platforms such as Facebook and Instagram or may redirect you off our Website away from our Services to other websites for information, other services, or for online purchases or pre-orders. For example, our Services contain integrated solutions or services provided by our e-commerce merchants and fulfillment partners to help us power our Services, integrate links for online menus, purchases, and pre-orders.

These service solutions or linked websites may send their own cookies to you, independently collect data, or solicit Information and may or may not have their own published privacy policies. This Privacy Policy only applies to Information collected by our Services. We are not responsible for the privacy and security practices of those other websites or Social Media Platforms or the Information they may collect (which may include IP address). You should contact such third parties directly to determine their respective privacy policies. Links to any other websites or content do not constitute or imply an endorsement or recommendation by us of the linked website, Social Media Platform, and/or content.

IV. INFORMATION SECURITY

We use commercially reasonable measures to provide our Services. However, you should assume that no data transmitted over the Internet or stored or maintained by us or our third-party service providers can be 100% secure. Therefore, we do not promise or guarantee, and you should not expect, that your Information or private communications will always remain private or secure. We do not guarantee that your Information will not be misused by third parties. We are not responsible for the circumvention of any privacy settings or security features. You agree that we will not have any liability for misuse, access, acquisition, deletion, or disclosure of your Information.

If you believe that your Information has been accessed or acquired by an unauthorized person, you should promptly Contact Us so that necessary measures can quickly be taken.

V. DATA RETENTION

We will retain your Information for as long as needed to provide you Services. If you wish to request that we no longer use your Information to provide you Services, please contact us at media@acreageholdings.com. We will retain and use your Information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. In accordance with our routine record keeping, we may delete certain records that contain Information you have submitted to us. We are under no obligation to store such Information indefinitely and disclaim any liability arising out of, or related to, the destruction of such Information.

VI. OUR RIGHT TO CONTACT YOU

You agree that we, or third-party service providers with whom we collaborate, may communicate with you regarding our Services via electronic messages, including email, text message, or mobile push notification to, for example, send you information relating to our products and Services that we think may be of interest to you, communicate with you about contests, sweepstakes, offers, promotions, rewards, upcoming events, and other news about products and services provided by or through us through permissible targeted advertisements offered by us, our parent companies, our subsidiaries, our affiliates, and other business partners. See Your Choices, below, for how you can update the way we contact you.

VII. YOUR CHOICES

- **Email.** By using our Services, you agree that we may contact you by email as set forth herein. If you do not want to receive marketing and promotional emails from us, you may click on the “unsubscribe” link in the email to unsubscribe and opt out of marketing email communications or [Contact Us](#).
- **Mobile Push Notifications.** By using our Services, you agree that we may contact you by calling or sending messages to your phone. You can use the settings on your mobile device to enable or turn off mobile push notifications from us or [Contact Us](#).
- **Text Messages.** On our Services, you may voluntarily sign up to receive text messages from Acreage or third-party service providers on behalf of Acreage. By signing up for text messaging services or otherwise opting in to receive text messages (opting in via short code or entering your phone number into an on-site collection widget), you agree that you have provided to Acreage, our partners, or our third-party service providers with prior express written consent to be contacted by text message, including recurring automated promotional and personalized text messages before we contact you. Your consent is not a condition of any our Services and your consent to be contacted as described is voluntary. The number of text messages you receive may vary based upon the text messaging service(s) you sign up for. Message and data rates may apply. If you no longer want to receive text messages from us, reply STOP (or as otherwise instructed) in the text message or by contacting us.
- **Location Choices.** You can change the privacy settings of your device at any time to turn off the sharing of location information with our Services. If you choose to turn off location services, this could affect certain features or services of our Services. If you have specific questions about the privacy settings of your device, we suggest you contact the manufacturer of your device or your mobile service provider for help.
- **Opting Out of Direct Marketing from Third Parties.** To exercise choices regarding the marketing information you receive, you may also review the following links:
 - You may opt out of tracking and receiving tailored advertisements on your mobile device by some mobile advertising companies and other similar entities by downloading the App Choices app at <http://www.aboutads.info/appchoices>.
 - You may opt out of receiving permissible targeted advertisements by using the NAI Opt-out tool available at <http://optout.networkadvertising.org/?c=1> or visiting About Ads at <http://optout.aboutads.info>.
 - You can opt out of having your activity on our Services made available to Google Analytics by installing the Google Analytics opt-out add-on for your web browser by visiting: <https://tools.google.com/dlpage/gaoptout> for your web browser.

VIII. NOTICE TO CALIFORNIA RESIDENTS

To the extent any California data privacy law applies to the collection of your Information (defined), this supplemental section of our Privacy Policy outlines how California residents can receive their Information (via request) and what you can receive and applies solely to California residents. We provide the supplemental selection below to comply with the California Consumer Privacy Act of 2018 (“CCPA”), and any terms defined in the CCPA have the same meaning when used below.

A. Access to Specific Information and Data Portability Rights

California residents have the right to request that Acreage disclose certain information to you about Acreage’s collection and use of your Information over the past twelve (12) months. Once Acreage receives and confirms a verifiable request from you, Acreage will disclose to you, to the extent permitted by law:

- The categories of Information Acreage collected about you.
- The categories of sources for your Information Acreage collected about you.
- Acreage’s business or commercial purpose for collecting your Information.
- The categories of third parties with whom Acreage shares your Information.
- If we disclosed your Information for a business purpose, the Information categories that each category of recipient obtained.

You shall have the right to request that the information described above be provided to you in a portable and readily useable format, to the extent technically feasible (“data portability”).

Acreage does not sell your Information.

B. Deletion Request Rights

You have the right to request that Acreage delete certain of your Information that Acreage collected from and/or related to you and retained, subject to certain exceptions.

To the extent that Acreage can delete your Information, once Acreage receives and confirms your verifiable request, Acreage will delete (and direct our service providers to delete) your Information, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

- Complete the transaction for which we collected your Information, provide a good or service that you requested, or take actions reasonably anticipated within the context of our ongoing business relationship with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, enable the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the Information’s deletion may

likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.

- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

C. Exercising Your Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable request to Acreage by either:

Contacting us at media@acreageholdings.com; or

Calling Acreage, at 1-646-600-9181 or 1-888-821-6706.

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable request related to your Information. You may also make a verifiable request on behalf of your minor child.

You may only make a verifiable request for access or data portability twice within a 12-month period. The verifiable request must:

- Provide sufficient information that allows Acreage to reasonably verify you are the person about whom Acreage collected Information or an authorized representative.
- Describe your request with sufficient detail that allows Acreage to properly understand, evaluate, and respond to it.

D. Non-Discrimination

We may not, and will not, treat you differently because you of your request activity. As a result of your request activity, we may not and will not deny goods or services to you, charge different rates for goods or services, provide a different level quality of goods or services, or suggest any of the preceding will occur. However, we can and may charge you a different rate, or provide a different level of quality, if the difference is reasonably related to the value provided by your Information.

E. Verifying Requests

To help protect your privacy and maintain security, if you request access to or deletion of your Information, we will take steps and may require you to provide certain information to verify your identity before granting you access to your Information or complying with your request. In addition, if you ask us to provide you with specific pieces of Information, we may require you to sign a declaration under penalty of perjury that you are the consumer whose Information is the subject of the request. If you designate an authorized agent to make a request on your behalf, we may require you to provide the authorized agent written permission to do so and to verify your own identity directly with us (as described above).

F. Shine the Light Requests

California Civil Code Section 1798.83 permits you to opt out of the disclosure of your Information by Acreage to third parties for the third parties' direct marketing purposes. To make an opt-out request of such disclosures, please send an email to media@acreageholdings.com.

G. Additional Information

We do not charge a fee to submit your request unless we are permitted by applicable law to charge a reasonable fee to comply with your request. This Statement is available in alternative formats upon request by contacting media@acreageholdings.com or calling us at 1-646-600-9181 or 1-888-821-6706.

IX. ACCESSING, CORRECTING, OR DELETING YOUR INFORMATION

To the extent state laws provide users with certain data subject rights, those rights may be honored by the Company following proper authentication and verification. Please see the How to Contact Us section below for more information.

X. GEOGRAPHIC LOCATION OF DATA STORAGE AND PROCESSING

Our Services are targeted to individuals located in the United States. As such, the Services collect Information and process and store that Information in databases located in the United States. If you are visiting the Services from a country outside the United States, you should be aware that you may transfer Information about yourself to the United States, and that the data protection laws of the United States may not be as comprehensive as those in your own country. By visiting the Services and submitting any Information you consent to the transfer of such Information to the United States.

XI. CHILDREN'S INFORMATION

The Services are intended for individuals over the age of 21 or who are a qualifying patient or caregiver.

If we become aware that a user is under 13 (or a higher age threshold where applicable) and has provided us with Information, we will take steps to comply with any applicable legal requirement to remove such Information. Contact us if you believe that we have mistakenly or unintentionally collected Information from a child under the age of 13.

XII. CHANGES TO THIS PRIVACY POLICY

We reserve the right to change, modify or amend this Privacy Policy at any time to reflect changes in our products and service offerings, accommodate new technologies, regulatory requirements, or other purposes. If we modify our Privacy Policy, we will update the "Effective Date" and such changes will be effective upon posting. It is your obligation to check our current Privacy Policy for any changes.

XIII. HOW TO CONTACT US

If you have any questions about this Privacy Policy or the Information we have collected about you, please contact us at the following:

Email us: media@acreageholdings.com

Call us toll free: 1-646-600-9181 or 1-888-821-6706

Write us:

Acreage Holdings, Inc.
Re: Privacy Policy
366 Madison Avenue, 14th Floor
New York, NY 10017