

# PRIVACY POLICY

LAST UPDATED: FEBRUARY 28, 2023

## 1. INTRODUCTION

This privacy policy (“**Privacy Policy**”) explains how Domain Logistics collects, uses, processes and discloses personal information about you when acting as a value-added partner to The Ontario Cannabis Store (“**OCS**”), Ontario's only online retailer and wholesaler of legal recreational cannabis. This Privacy Policy applies to all information Domain Logistics collects when acting as the exclusive third party logistics provider for OCS, and applies whether our services are accessed online via a computer or mobile device or via any other form of inquiry (collectively, the “**Services**”).

Domain Logistics offers our Services to OCS’ customers as part of the regulated cannabis industry in Ontario that is administered by OCS, a Crown agency solely owned by the Province of Ontario and reporting to the Ministry of Finance. In the course of partnering with OCS, Domain Logistics collects, uses, processes and discloses personal information on behalf of and as agent for OCS. OCS and its agents collect, use, process, disclose, retain and/or dispose of personal information in accordance with the *Freedom of Information and Protection of Privacy Act* (“**FIPPA**”) and other applicable privacy laws, and under the authority of the *Ontario Cannabis Retail Corporation Act, 2017, S.O. 2017*.

This Privacy Policy also applies to personal information obtained by Domain Logistics from prospective and existing business clientele, and to personal information obtained from prospective employees via our career portal. In its processing of such personal information, Domain Logistics may be subject to the *Personal Information Protection and Electronic Documents Act* (“**PIPEDA**”) and substantially similar provincial laws.

By using the Services, you acknowledge that you have read and agree to be bound by the terms of this Privacy Policy. If you do not agree to the terms set out herein, you may not use or access our Services.

## 2. COLLECTION OF INFORMATION

### What is Personal Information?

For the purposes of this Privacy Policy, “**Personal Information**” means any information about an identifiable individual and includes any information that constitutes personal information within the meaning of FIPPA or any other applicable privacy law.

### What Personal Information Do We Collect?

Domain Logistics collects various types of personal information from users within Ontario and Canada, as required for our order fulfilment and shipping operations, and in other cases, to improve your experience using our Services.

Below we outline how we collect and use different categories of data and the relevant user groups, including consumers, clients, suppliers and other business partners.

### Career and Business Inquiries

Domain Logistics will process personal information you enter voluntarily on our websites, or provide directly in any other way. The means by which we may gather information from you directly include inquiry and contact forms and requests for proposals. The personal information in this category may include:

- Contact information (full name, address, email address, phone number);
- Company name;
- Information about your educational background, skills, attributes, and interests, when registering via our careers portal;
- Information about your business or career inquiry that you choose to provide to us.

Domain Logistics may collect and use information via our website to provide you with requested information (including to respond to your inquiries about deliveries), as well as help us design and deliver better services to our clients.

When registering via our careers portal, we obtain your information in order to provide you with recommendations as to your suitability for various available positions.

Completion of any forms or questionnaires is entirely voluntary, although may be required to submit certain inquiries with our company.

### **Information from Consignees/Consumers**

When you order from OCS, we may receive the following information about you as required for order fulfillment, shipment and delivery:

- Order/shipment information (e.g., items purchased);
- Contact information (name, email address, phone number, address);
- Type of ID presented to us when we confirm your Order (we record the type of ID you have presented, and verify your ID, but we do not collect nor retain any information apart from the type of ID).

Domain Logistics may use your order information, including delivery address, contact information and item details as required to facilitate order fulfillment and shipment delivery.

### **Suppliers and Other Business Partners**

If you are a company that supplies services to us, or that has an inquiry about the services offered by our related companies, we may collect the following information:

- Client /supplier contact information (name, email and phone numbers);
- Client/supplier financial information for billing purposes;
- Client/supplier address details for billing purposes;
- IP address information.

### **Information Domain Logistics Automatically Collects**

When you access or use our website, Domain Logistics may automatically collect certain information about you via our use of Google Analytics, including:

- Session statistics (e.g. page views, events, interactions);
- Approximate geolocation: geographical dimensions such as city and country that are automatically derived from the IP address;
- Browser and device information: operating system, browser, and the type of the you are using (e.g. iPad).

### **3. USE OF INFORMATION**

All of your Personal Information that is provided to or collected by Domain Logistics will only be used by Domain Logistics in connection with our Services, and may be shared with OCS as the organization to whom we provide supply chain logistic services, for purposes of fulfillment of your order.

Domain Logistics uses the information collected through our website and via other means for the purposes described in this Privacy Policy or as otherwise disclosed to you in connection with the website. For example, Domain Logistics may use your information:

- (a) to provide you with delivery services;
- (b) to identify relevant employment opportunities;
- (c) to provide, maintain and improve the website;
- (d) to receive inquiries about your order tracking;
- (e) to communicate with our business partners including courier subcontractors;
- (f) to respond to your comments, questions and requests and provide support services;
- (g) to confirm your continued eligibility to maintain an account;
- (h) to monitor and analyze trends, usage and activities in connection with the website;
- (i) as otherwise as permitted or required by applicable law.

### **4. SHARING OF INFORMATION**

Domain Logistics may share Personal Information about you, in accordance with the following or as otherwise described in this Privacy Policy:

- (a) with OCS for any and all purposes for which Domain Logistics may use your information and for any regulatory compliance purpose, and as further permitted or required by applicable law;
- (b) with our parent company Legacy Supply Chain if you are a business that has made inquiries about our supply chain services;
- (c) with Domain Logistics' third party service providers, including:
  - (i) contracted labour;
  - (ii) transportation carriers
  - (iii) physical and IT security providers;
  - (iv) technical support and payment processing services;

- (d) with our analytics service providers as described above (e.g., Google Analytics for web site usage);
- (e) in connection with, or during the negotiation of, any merger, sale of company stock or assets, financing, acquisition, divestiture, or dissolution of all or a portion of Domain Logistics business;
- (f) in response to a request for information if Domain Logistics believes disclosure is required by, or is in accordance with, any applicable law, regulation or legal process. For example, as agent for OCS, and given that information collected in the course of provision of services to OCS is under its control, Domain Logistics may disclose Personal Information in compliance with FIPPA to facilitate responses to freedom of information requests and requests from individuals for information relating to them;
- (g) to investigate any suspected fraudulent or dishonest activity, or if Domain Logistics believes your actions are inconsistent with this Privacy Policy, any applicable agreement, or to protect the rights, property or safety of Domain Logistics or others;
- (h) with your consent or at your direction including if Domain Logistics notifies you through the website or other means that the information you provide will be shared in a particular manner and you provide such information; and
- (i) to exercise any of Domain Logistics other rights as described in the Terms, and/or as prescribed or permitted by applicable laws.

Domain Logistics may also share aggregated or anonymized information, which cannot reasonably be used to identify you.

## 5. ANALYTICS

Domain Logistics analytics service providers include:

- (a) Google Analytics: Google Analytics is a web analytics service that provides statistics and analytical tools for search engine optimization and marketing purposes. Domain Logistics uses Google Analytics to see information on concerning Site activities including, but not limited to, page views, source and time spent on a Site. Domain Logistics uses Google Analytics on Sites to analyze how users use the website. Google Analytics may collect information such as user location as inferred from IP address, the amount of time a visitor spends on a Site, which pages are more frequently accessed, how the Site is accessed (either directly, from a search engine, or from a link), what sort of software is used (e.g., operating system, browser type, etc.), as well as demographics. For more information on how Google Analytics collects and processes information, please visit: [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/).

For information about how to opt out of having your information used by Google Analytics, visit: <https://tools.google.com/dlpage/gaoptout/>.

## 6. LOCATION OF DATA STORAGE AND PROCESSING

Domain Logistics and its third-party service providers use, store, process and retain the Personal Information collected within the territory of Canada.

## 7. RETENTION

Domain Logistics will retain your Personal Information for as long as needed to provide you the services on the Sites.

## **8. INFORMATION SECURITY**

Domain Logistics takes reasonable measures to help protect your Personal Information from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction. Please be advised that no means of transmission over the Internet is 100% secure and accordingly, your use of the Site remains at your own risk.

Domain Logistics will take appropriate steps to contain, investigate, and remediate data security incidents. Domain Logistics will notify applicable regulatory authorities and affected parties about data security incidents as appropriate and/or required by law and will aid OCS and any other applicable authorities in the management and handling of such data incidents.

## **9. MINORS**

Domain Logistics does not knowingly collect Personal Information from persons under the age of majority. If Domain Logistics determines that an individual is under the age of majority, it will not use, maintain, or continue to collect Personal Information from such individual. If you are a parent or guardian and believe Domain Logistics has mistakenly collected Personal Information from your child who under the age of majority, you can notify Domain Logistics using the contact information set out in Section 12 (Contact Us) below.

## **10. YOUR CHOICES**

### **10.1 Access, Correction, Deletion**

Subject to legal limitations, you may contact Domain Logistics using the contact information set out in Section 12 (Contact Us) below to make requests for access to, correction or deletion of certain Personal Information that Domain Logistics processes and stores. Any such communication must be in writing.

Your right to access the Personal Information that Domain Logistics holds about you is not absolute. There are instances where applicable law or regulatory requirements allow or require Domain Logistics and/or OCS to refuse to provide some or all of the Personal Information that it holds about you. In addition, the Personal Information may have been destroyed, erased or made anonymous in accordance with record retention obligations and practices. In the event that Domain Logistics cannot provide you with access to your Personal Information or if Domain Logistics does not agree with your request to change your Personal Information, Domain Logistics will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

## **11. CHANGES TO THIS PRIVACY POLICY**

Domain Logistics may change this Privacy Policy from time to time. If Domain Logistics makes any changes, it will notify you by revising the "Last Updated" date at the top of this Privacy Policy, and, in some cases, Domain Logistics may provide you with more prominent notice (such as by adding a statement to the homepage of the Sites or sending you an email notification). You are encouraged to review this Privacy Policy whenever you access the Site to stay informed about Domain Logistics information practices and about ways you can help protect your privacy.

## **12. CONTACT US**

If you have any questions about this Privacy Policy or concerns about the handling of your Personal Information, please contact Domain Logistics by phone at: 1-519-827-2940.

Alternatively, for services involving fulfillment of orders placed with OCS, you may contact OCS:

(a) by telephone at: 1-888-910-0627; or

(b) by e-mail intake form at: [ocs.icescape.com](https://ocs.icescape.com).

Domain Logistics will endeavor to respond to all privacy complaints as soon as possible. If you are not satisfied with the way that Domain Logistics handled your privacy complaint, you may contact the relevant privacy regulator. For orders placed with OCS, you may contact as follows:

Information and Privacy Commissioner of Ontario  
2 Bloor Street East, Suite 1400  
Toronto, Ontario M4W 1A8

Domain Logistics reserves the right to provide a copy of your complaint and relevant documentation to the privacy regulator.