

MAPLE ORGANICS

PRIVACY POLICY

Thank you for visiting <http://www.mapleorganics.com>. This Site is powered by Everlaan Organics Inc., and its subsidiaries and affiliates ("Maple Organics"). As used in this Privacy Policy, the terms "our," "we" and "us" refer to both Maple Organics and your Independent Wellness Consultant, unless the context clearly provides otherwise.

We appreciate the opportunity to interact with you on the Internet and are committed to protecting and safeguarding your privacy. The purpose of this Privacy Policy is to inform you about the types of information we might collect about you when you visit our Site, how we may use that information, whether we disclose it to anyone, and the choices you have regarding our use of, and your ability to correct, that information.

I. **BACKGROUND**

Maple Organics' Chief Privacy Officer is responsible for the company's compliance and enforcement of this policy and data security issues. The CPO is available to any of its valued employees, Independent Wellness Consultants, customers, vendors, business partners or others who may have questions concerning this Policy or data security practices. Relevant contact information is provided below.

II. **CHANGES TO THIS PRIVACY POLICY**

The practices described in this Policy are current personal data protection policies. Maple Organics reserves the right to modify or amend this Policy at any time consistent with the requirements of any applicable law. Appropriate notice will be given on this website concerning such amendments.

III. **DEFINITIONS**

For purposes of this Policy, the following definitions shall apply:

- "Agent" means any third party that uses Personal Information provided by Maple Organics to perform tasks on behalf of or at the instruction of Maple Organics.
- "Maple Organics" means Everlaan Organics Inc., a British Columbia, Canada corporation, its predecessors, successors, subsidiaries, affiliates, officers, directors, divisions and business groups.

- "Personal Information" means any information or set of information that identifies or could be used by or on behalf of Maple Organics to identify an individual. Personal Information does not include information that is encoded or anonymized, or publicly available information that has not been combined with non-public Personal Information.
- "Sensitive Personal Information" means Personal Information that reveals race, ethnic origin, trade union membership, or that concerns health. In addition, Maple Organics will treat as sensitive Personal Information any information received from a third party where that third party treats and identifies the information as sensitive.

IV. **SCOPE**

This Policy applies to all Personal Information received by Maple Organics in any format including electronic, paper or verbal. Maple Organics collects and processes Personal Information concerning current and former Independent Wellness Consultants and their respective family members, as well as Independent Wellness Consultant applicants through this website, electronic mail, and manually. Maple Organics is the sole owner of information it collects from current and former Independent Wellness Consultants and Independent Wellness Consultant applicants, customers, vendors and others. Maple Organics will not sell or share this information with third parties in ways different than what is disclosed in this Privacy Policy. On a global basis, Maple Organics will, and will cause its affiliates to, establish and maintain business procedures that are consistent with this Policy.

Personal Information collected by Maple Organics from Independent Wellness Consultants and Independent Wellness Consultant applicants is maintained at its corporate offices in Vancouver, British Columbia, Canada. Maple Organics collects Personal Information for, among other things, legitimate human resource business reasons such as compensation administration; filling Independent Wellness Consultant positions; administration and operations of its incentive programs; meeting governmental reporting requirements; security, health and safety management; performance management; company network access; and authentication. Maple Organics does not request or gather information regarding political opinions, religion, philosophy or sexual preference. To the extent Maple Organics maintains information on an individual's medical health or ethnicity (as legally required), Maple Organics will protect, secure and use that information in a manner consistent with this Policy and any applicable law.

Personal Information collected by Maple Organics from prospective customers, consumers, Independent Wellness Consultants, vendors, business partners and others may be maintained at its corporate offices in Vancouver, British Columbia, or at other Maple Organics facilities. Maple Organics collects

Personal Information for, among other things, legitimate business reasons such as customer service; product, warranty and claims administration; meeting governmental reporting and records requirements; maintenance of accurate accounts payable and receivable records; internal marketing research; safety and performance management; financial and sales data; and contact information. All Personal Information collected by Maple Organics will be used for legitimate business purposes consistent with this Policy.

V. **PRIVACY PRINCIPLES**

This Policy is based on seven Privacy Principles.

1) NOTICE:

Where Maple Organics collects Personal Information directly from individuals, it will inform them about the purposes for which it collects and uses Personal Information about them, the types of non-agent third parties to which Maple Organics discloses that information, and the choices and means, if any, Maple Organics offers individuals for limiting the use and disclosure of their Personal Information. Notice will be provided in clear and conspicuous language when individuals are first asked to provide Personal Information to Maple Organics, or as soon as practicable thereafter, and in any event before Maple Organics uses the information for a purpose other than that for which it was originally collected. Maple Organics may disclose Personal Information if required to do so by law or to protect and defend the rights or property of Maple Organics.

2) CHOICE:

Maple Organics will offer individuals the opportunity to choose (opt-out) whether their Personal Information is (a) to be disclosed to a non-agent third party, or (b) to be used for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

For sensitive Personal Information, Maple Organics will give individuals the opportunity to affirmatively and explicitly (opt-in) consent to the disclosure of the information to a non-agent third party or the use of the information for a purpose other than the purpose for which it was originally collected or subsequently authorized by the individual.

Maple Organics will provide individuals with reasonable mechanisms to exercise their choices should requisite circumstances arise.

3) DATA INTEGRITY:

Maple Organics will use Personal Information only in ways that are compatible with the purposes for which it was collected or subsequently authorized by the

individual. Maple Organics will take reasonable steps to ensure that Personal Information is relevant to its intended use, accurate, complete and current.

4) TRANSFERS TO AGENTS:

Maple Organics will obtain assurances from its Agents that they will safeguard Personal Information consistently with this Policy. Examples of appropriate assurances that may be provided by Agents include: a contract obligating the Agent to provide at least the same level of protection as is required by the relevant Principles or EU-US Privacy Shield certification by the Agent. Where Maple Organics has knowledge that an Agent is using or disclosing Personal Information in a manner contrary to this Policy, Maple Organics will take reasonable steps to prevent or stop the use or disclosure. Maple Organics holds its Agents accountable for maintaining the trust our employees and customers place in the company.

5) ACCESS AND CORRECTION:

Upon request, Maple Organics will grant individuals reasonable access to Personal Information that it holds about them. In addition, Maple Organics will take reasonable steps to permit individuals to correct, amend or delete information that is demonstrated to be inaccurate or incomplete. Any Independent Wellness Consultant that desires to review or update their Personal Information can do so by contacting their Maple Organics.

6) SECURITY:

Maple Organics will take reasonable precautions to protect Personal Information in its possession from loss, misuse and unauthorized access, disclosure, alteration and destruction. Maple Organics protects data in many ways. Physical security is designed to prevent unauthorized access to database equipment and hard copies of sensitive Personal Information. Electronic security measures continuously monitor access to our servers and provide protection from hacking or other unauthorized access from remote locations. This protection includes the use of firewalls, restricted access and encryption technology. Maple Organics limits access to Personal Information and data to those persons in Maple Organics' organization, or as agents of Maple Organics, that have a specific business purpose for maintaining and processing such Personal Information and data. Individuals who have been granted access to Personal Information are aware of their responsibilities to protect the security, confidentiality and integrity of that information and have been provided training and instruction on how to do so.

7) ENFORCEMENT:

Maple Organics will conduct compliance audits of its relevant privacy practices to verify adherence to this Policy. Any employee or Independent Wellness

Consultant that Maple Organics determines is in violation of this Policy will be subject to disciplinary action up to and including termination of employment.

VI. DISPUTE RESOLUTION

Any questions or concerns regarding the use or disclosure of Personal Information should be directed to the Maple Organics' Chief Privacy Officer at the address given below. Maple Organics will investigate and attempt to resolve complaints and disputes regarding use and disclosure of Personal Information in accordance with the principles contained in this Policy.

VII. INTERNET PRIVACY

Maple Organics sees the Internet, intranets and the use of other technologies as valuable tools for communicating and interacting with consumers, Independent Wellness Consultants, employees, vendors, business partners and others. Maple Organics recognizes the importance of maintaining the privacy of Personal Information collected through websites that it operates. Maple Organics' sole purpose for operating its websites is to provide information concerning products to the public. In general, visitors can reach Maple Organics on the Web without revealing any Personal Information. Visitors on the Web may elect to voluntarily provide Personal Information via Maple Organics websites but are not required to do so. Maple Organics collects information from visitors to the websites who voluntarily provide Personal Information by filling out and submitting online questionnaires concerning feedback on the website, requesting information on products or services, or seeking employment. The Personal Information voluntarily provided by website users is contact information limited to the user's name, home and/or business address, phone numbers and email address. Maple Organics collects this information so it may answer questions and forward requested information. Maple Organics does not sell or share this information with non-agent third parties.

Maple Organics may also collect anonymous information concerning website users through the use of "cookies" in order to provide better customer service. "Cookies" are small files that websites place on users' computers to identify the user and enhance the website experience. None of this information is reviewed at an individual level. Visitors may set their browsers to provide notice before they receive a cookie, giving the opportunity to decide whether to accept the cookie. Visitors can also set their browsers to turn off cookies. If visitors do so, however, some areas of Maple Organics' websites may not function properly.

Maple Organics may use one or more companies to place advertisements for our products and services and those of third parties on our Site and third-party sites. Cookies and other technologies such as Web beacons or tags are

used to measure the effectiveness of our ads and to determine the display of content and advertising to you based on your interests both on our site, as well as on third-party sites where you may visit. To support this interest based advertising solution, we, and companies who we have contracted with, may use anonymous information about your visits to our and other Web sites. The information collected and used by this process is always anonymous, and does not enable any third-party to identify you individually.

Although it is our hope that you find the display of advertising to you based on your anonymous interests valuable, if you would prefer not to participate in the services offered through these solutions, you can always opt-out of this activity by visiting the Network Advertising Initiative (NAI) website by clicking http://www.networkadvertising.org/managing/opt_out.asp.

Maple Organics' websites are not directed toward children. Nevertheless, Maple Organics is committed to complying with applicable laws and requirements, such as the United States' *Children's Online Privacy Protection Act* ("COPPA"). Maple Organics' website users have the option to request that Maple Organics not use information previously provided, correct information previously provided, or remove information previously provided to Maple Organics. Those that would like to correct or remove information they have provided to Maple Organics should forward such inquiries to:

Maple Organics
5609 Chester Street
Vancouver, BC V5W 3B3

Attention: Chief Privacy Officer

The inquiries should include the individual's name, address, and other relevant contact information (phone number, email address). Maple Organics will use all reasonable efforts to honor such requests as quickly as possible.

Maple Organics websites may contain links to other "non-Maple Organics" websites. Maple Organics assumes no responsibility for the content or the privacy policies and practices on those websites. Maple Organics encourages all users to read the privacy statements of those sites; their privacy practices may differ from those of Maple Organics.