

PRIVACY POLICY – February 1, 2020

Welcome to Kush.com and related sub-domains (together, the “Applications”), mobile and/or software applications provided by Astro Management, LLC, and its affiliates, parent company and other related companies, including KexTrade, LLC and KMP, Inc. (“Us”, “We”, or “Kush”). This Kush Privacy Notice (“Notice”) described the information we collect, use and disclose about you when you use the Applications, mobile applications, and related services (together, the “Services”) and how we use, process and disclose that information. We may supplement this Notice with other notices. This Notice applies to Services that display or reference this Notice, but it does not apply to any services that display or reference a difference privacy statement.

1. Information We Collect from You

The information that we collect depends upon how you interact with us, the Services you use, and the choices you make. We collect information about you from different sources and in various ways when you use our Services, including information you provide directly, information collected automatically, third-party data sources, and information we infer or generate from other data.

Provided Directly by You: You may provide us with additional information by filling in forms on the Applications or by corresponding with us by phone, text, email, live chat, or otherwise. If you create an account, we may collect the following information from you:

- A. Contact Information. We collect contact information such as your name, username, email address and phone number;
- B. Demographic Data. When you register or at other times, we request that you provide demographic information such as your gender and location;
- C. Content and Files. We collect photos, documents, files and any other information that you provide us, such as reviews, content and bio information. If you send us email messages or other communications, we will collect and retain those communications; and
- D. Payment Information. If you make a purchase or other financial transaction, we collect credit card numbers, financial account information, shipping address, billing address and other payment details.

Information Collected Automatically: When you use the Applications and/or Services, we automatically collect information about you, for example:

- A. Usage Data. We automatically log your activity on our Applications, including pages you have viewed and actions you take on the Services and the URL of the website from which you came to our sites.
- B. Identifiers and Device Information. When you visit our Applications, our servers automatically collect certain technical information about your device including your internet protocol address and information about your device, including device identifiers (such as MAC address), your browser type, language and identifying information, your operating system and application version, device types, device modal and manufacturer, and your device operating system type and version. As further described in the Cookies and Similar Technologies

section below, our Services store and retrieve cookie identifiers, mobile IDs, and other data.

- C. Geolocation Data. Depending on your device and app settings, we collect geolocation data when you use our Applications and Services.

Cookies and Similar Technologies: We also use cookies, web beacons, mobile analytics and advertising IDs, URL information, and other similar technologies to operate our Applications and Services and to gather data, including other identifiers, device information, and usage data. 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 usually stay on your computer until you delete them) to provide you with a more personal and interactive experience on the Applications. The text in a cookie often consists of a string of numbers and letters that uniquely identifies your device, but it can contain other information as well. We use cookies on our Applications to store your preferences and settings, enable you to sign-in, provide interest-based advertising, combat fraud, analyze how our Services perform, and fulfill other legitimate purposes.

Our Applications may also contain electronic images known as web beacons (also called single-pixel gifs) that we use to help deliver cookies on our Applications, count users who have visited those Applications, and gather usage data. We also include web beacons in our promotional email messages or newsletters to determine whether you open them and act on them.

Mobile analytics and advertising IDs are generated by operating systems for mobile devices (iOS and Android) and can be accessed and used by apps in much the same way that websites access and use cookies. Our Applications contain software that enables our third-party analytics and advertising partners to access the mobile IDs.

We, together with our third-party analytics service providers and advertising partners, use these technologies in our Applications to collect personal information (such as the cookies stored on your browser, the advertising identifier on your mobile device, or the IP address of your device) when you visit our Applications. We and our partners may also use these technologies to collect personal information about your online activities over time and across different websites. This information is used to store your preferences and settings, enable you to sign-in, analyze how our Services perform, track your interaction with the Services, develop inferences, deliver

and tailor interest-based advertising, combat fraud, and fulfill other legitimate purposes. We and/or our partners also share the information we collect or infer with third parties for these purposes. The third-party analytics and advertising providers we use on our Applications include:

Company	Purpose
Google – Double Click	Advertising, Analytics
Google Analytics	Analytics
Facebook Audiences	Advertising
Facebook Connect	Advertising

We permit advertisements to be delivered to you by third-party internet advertising companies (also called ad networks or network advertisers). These companies may use cookies, web beacons, platform device identifiers, software agents, and other technologies to collect non-personally identifiable information about your visits over time on your Applications and across other websites to deliver advertisements to you targeted to your interests, measure their effectiveness and personalize advertising content, and to understand the usage and visitation of the Applications and the other applications and websites tracked by these advertising companies. We do not have access to or control over cookies, web beacons, platform device identifiers, software agents, or other technologies that they may use. We are not responsible for the privacy practices of third-party advertisers. You should check the privacy policy of the third-party advertiser to determine how it handles information it separately collects from you. In addition, the Network Advertising Initiative offers information about some of the internet advertising companies we may use. To learn about the privacy practices of these third parties and how to opt-out from their use of cookie data for targeted advertising purposes, click the associated link.

DoubleClick (Google), Privacy Policy:

<https://policies.google.com/privacy>

Google Analytics, Privacy Policy:

www.google.com/policies/privacy/partners

Facebook Audiences, Privacy Policy:

www.facebook.com/privacy/explanation

Facebook Connect, Privacy Policy:

www.facebook.com/privacy/explanation

Many of these companies are also members of associations, which provide a simple way to opt out of analytics and ad targeting, which you can access:

US: NAI www.networkadvertising.org

US: DAA www.aboutads.info

Canada: DAA <https://youradchoices.ca>

Europe: DAA www.youronlinechoices.com

2. California “Do Not Sell My Info”

The California Consumer Protection Act (“CCPA”) requires us to disclose categories of personal data sold to third parties and how to opt-out of future sales. The CCPA defines personal information to include online identifiers, including IP address, cookie IDs, and mobile IDs. The law also defines a “sale” to include simply making data available to third parties in some cases. We let advertising and analytics providers collect IP addresses, cookie IDs, mobile IDs through our Applications and Services, but do not “sell” any other types of personal information.

If you do not wish for us or our partners to “sell” your personal data to third parties for advertising purposes, you can make your Do Not Sell Request by emailing support@kush.com.

Note that although we will not “sell” your personal data after we receive your email, we will continue to share some personal information with our partners (acting as our service providers) to help us perform advertising-related functions such as, but not limited to, measuring the effectiveness of our ads, managing how many times you may see an ad, reporting on the performance of our ads, ensuring services are working correctly and securely, providing aggregate statistics and analytics, improving when and where you may see ads, and/or reducing ad fraud. Further, emailing us will not necessarily opt you out of the use of previously sold personal information or stop all interest-based advertising. If you access the Applications from other devices or browsers, visit the link below from those devices or browsers to ensure your choice applies to the data collected when you use those devices or browsers.

Other information related to your right to opt-out from sales of personal data is contained in the California Privacy Rights section of this Notice.

Cookie Controls. Most web browsers are set to accept cookies by default. If you prefer, you can go to your browser settings to learn how to delete or reject cookies. If you choose to delete or reject cookies, this could affect certain features or services of our website. If you choose to delete cookies, settings and preferences controlled by those cookies, including advertising preferences, may be deleted and may need to be recreated.

Mobile Advertising ID Controls. iOS and Android operating systems provide options to limit tracking and/or reset the advertising IDs.

Email Web Beacons. Most email clients have settings which allow you to prevent the automatic downloading of images, which will disable web beacons in the email messages you read.

Do Not Track. Some browsers have incorporated “Do Not Track” (DNT) features that can send a signal to the websites you visit indicating you do not wish to be tracked. Because

there is not a common understanding of how to interpret the DNT signal, our Applications do not currently respond to browser DNT signals. Instead, you can use the range of other tools to control data collection and use, including the cookie controls and advertising controls above.

Information Obtained from Third Party Sources. We also obtain information from third parties. We protect information obtained from third parties according to the practices described in this Notice, plus any additional restrictions imposed by the source of the information. These third-party sources include, for example:

Third Party Source	Categories of Data
Third Party Partners. Third party applications and services, including social networks you choose to connect with or interact with through our services. For example, if you create an account using, or otherwise connect your account to, a social networking services account (e.g. Twitter or Facebook), we may also collect information provided to use by such social networking service.	Contact information, demographic data, content and files, identifiers and device information, geolocation data, usage data, inferences
Co-Branding/Joint Partners. Partners which we offer co-branded services or engage in joint marketing activities	Contact information, demographic data, content and files, identifiers and device information, geolocation data, usage data, inferences
Service Providers. Third parties that collect or provide data in connection with work they do on our behalf, for example companies that determine your device’s location based on its IP address	Contact information, demographic data, content and files, identifiers and device information, geolocation data, usage data, inferences
Publicly Available Sources. Public sources of information such as open government databases	Contact information, demographic data, content and files, geolocation data

Information Created or Generated. We infer new information from other data we collect, including using automated means to generate information about your likely preferences or other characteristics (“inferences”). For example, we infer your city, state and country location based upon your IP address.

When you are asked to provide information, you may decline. And you may use app or device controls to prevent certain types of automatic data collection. But if you choose not to provide or allow information that is necessary for certain products or features, those products or features may be not available or function properly.

3. Your Sharing of Your Information

Kush Applications and Services may allow you to connect and share your actions, comments, content, profile, and information publicly or with other people. Depending on what domain your account is on and what type of account you have created, you may be able to control some of the categories of personal information shared via your profile from the account settings menu on the Applications. Please be mindful of your own privacy needs are you choose who to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public or share with others.

Kush Applications and Services may also provide you with the option to share certain information from your Kush account with social networking services like Facebook, Google, or Twitter. We are not responsible for the use or re-sharing by others of any of your information once it is made public. If you do not want your information to be made public, you should not use Kush Applications and Services in this manner and/or you should adjust your privacy settings on the applicable social networking service accordingly. We are not responsible for and we do not control these social networking services privacy practices. Please review the applicable privacy policy for information about how they use your information.

4. How Kush Uses Your Information

We use the information we collect for purposes described in this Notice or otherwise disclosed to you. For example, Kush generally uses your information to:

Purposes of Use	Categories of Personal Data
Product and Service Delivery. To provide and deliver our Services, including creating accounts on, securing, troubleshooting, improving, and personalizing those Services	Contact information, demographic data, content and files, identifiers and device information, geolocation data, usage data, inferences
Business Operations. To operate our business, such as billing, accounting, improving our internal operations, securing our systems, and detecting and protecting against fraudulent or illegal activity	Contact information, demographic data, content and files, identifiers and device information, geolocation data, usage data, inferences
Product and Service Improvement, Development, and Research. To improve our Services, develop new products or features, and conduct research	Contact information, demographic data, content and files, identifiers and device information, geolocation data, usage data, inferences

Personalization. To understand you and your preferences to enhance your experience and enjoyment using our Applications and Services	Contact information, demographic data, content and files, identifiers and device information, geolocation data, usage data, inferences
Customer Support. To provide customer support and respond to your questions.	Contact information, demographic data, content and files, identifiers and device information, geolocation data, usage data, inferences
Communications. To send you information about your use of the Applications, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages.	Contact information, demographic data, content and files, identifiers and device information, geolocation data, usage data, inferences
Marketing. To communicate with you about new products, offers, promotions, rewards, contests, upcoming events, and other information about our products and those of our selected partners (see the Information Choices section of this Notice for how to change your preferences for promotional communications).	Contact information, demographic data, content and files, identifiers and device information, geolocation data, usage data, inferences
Advertising. To display advertising to you (see the Cookies and Similar Technologies section of this Notice for information about personalized advertising and your advertising choices).	Contact information, demographic data, content and files, identifiers and device information, geolocation data, usage data, inferences

- A. We may share your personal information with your consent or at your direction or as otherwise necessary to complete your transactions or provide the Services you have requested or authorized.
- B. With our subsidiaries and affiliates, who may share common data systems and process information as needed to provide the Services and operate our business.
- C. We may also share your personal information with others who perform services on our behalf (for example, with a mobile carrier if you receive/respond to a text using the Services).
- D. We may share your information with third-party service providers to fulfill your requests and perform functions on our behalf. Examples include product reservation requests, fulfilling orders, processing credit card payments, and delivering orders. We only share information necessary for these third-party services providers to perform their functions, and any information shared may not be used for any other purpose.
- E. We may disclose your information if we believe we are required to do so by law, or to comply with a court order, judicial or other government subpoena, or warrant.
- F. We may also disclose your information if we believe doing so is appropriate or necessary to prevent any liability, or fraudulent, abusive, or unlawful uses or to protect Kush and our Services; or any rights, property or personal safety of Kush or others, including as we believe is necessary to enforce our agreements, terms and policies.
- G. In the event that Kush is or may be acquired by or merged with another company or involved in any other business deal (or negotiation of a business deal), including a financing, transfer, or divestiture, involving sale or transfer of all or part of our business or assets, we may transfer or assign your information as part of or in connection with the transaction. Finally, in the event of insolvency, dissolution, bankruptcy or receivership, information may be transferred as a business asset.

In carrying out these purposes, we combine data we collect from different sources to give you a more seamless, consistent, and personalized experience.

We may also use your information to verify your geographic location. We may use your geographic location data to personalize our Services, to recommend content, determine whether the information you have requested is available in your location, or to determine whether Services offered are available in your location. If information is aggregated or de-identified so it is no longer reasonable associated with an identified or identifiable natural person, Kush may use it for any business purpose.

5. How Kush Discloses Your Information

We may share your information as follows:

This party analytics and advertising companies also collect personal information through our Services including, account information, marketing and communications data, demographic data, content and files, geolocation data, usage data, and inferences associated with identifiers and device information (such as Cookie IDs, device IDs, and IP address) as described in the Cookies and Similar Technologies section of this Notice.

We may also share aggregated and anonymized data with our partners, advertisers, and other third parties as authorized by law.

Please note that some of our products include references or links to products provided by third parties whose privacy practices differ from ours. If you provide information to any of those third parties, or consent to our sharing information with them, that information is governed by their privacy statements.

6. Data Security

Kush uses various safeguards designed to protect personal information submitted to us, including, where appropriate, encryption of data stored and encrypting information in transit. Where Kush uses third party providers to store and transmit personal information, Kush utilizes the security tools offered by these providers that are designed to protect personal information. In addition to use of certain security tools made available by third party providers, Kush takes reasonable and appropriate steps to help protect your information against loss, misuse, and unauthorized access, or disclosure. No company can fully prevent security risks, however. While we strive to protect your personal information, we cannot guarantee its absolute security. To help protect yourself and your information, choose a unique password for our Applications and Services and do not use a password on our Services that you would use on any other website or online service.

7. Location of Personal Data

The information we collect may be stored and processed in your country or region, or in any other country where we or our affiliates, subsidiaries, or service providers maintain facilities. Currently, we primarily use data centers in the United States where our servers are located. We have chosen this location to operate efficiently and improve performance. That information may then be transferred within the United States or back out of the United States to other countries outside of your country of residence, depending on the type of information and how it is stored by use. These countries (including the United States) may not necessarily have the data protection laws as comprehensive or protective as those in your country of residence; however, we take steps designed to ensure that the information we collect under this Notice is processed according to the provisions of this Notice and applicable law wherever the information is located.

Accordingly, we transfer personal data from the European Economic Area and Switzerland to other countries, some of which have not been determined by the European Commission to have an adequate level of data protection. When we do so, we use a variety of legal mechanisms, including contracts, to help ensure your rights and protections. To learn more about the European Commission's decisions on the adequacy of personal data protections, please visit: <https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries.en>

8. Retention of Information

We retain information for as long as necessary to provide the Services and fulfill the transactions you have requested, comply with our legal obligations, resolve disputes, enforce our agreements, and other legitimate and lawful business purposes. Because these needs can vary from different data types in the context of different data types in the context of

different products, actual retention periods can vary significantly based on criteria such as user expectations or consent, the sensitivity of the data, the availability of automated controls that enable users to delete data, and our legal or contractual expectations.

9. Information Choices

Access, correction and deletion. If you wish to request access to, or correction or deletion of, information about you that we hold, you may contact customer support with your request at support@kush.com.

To the extent permitted by applicable law, we reserve the right to charge a fee or decline requests that are unreasonable or excessive, where providing the information would be prohibited by law or could adversely affect the privacy or other rights of another person, or where we are unable to authenticate you as the person to whom the information relates.

Communication preferences. You may opt out of receiving marketing/promotional emails from Kush by following the instructions in those emails or by reviewing the settings in your account, depending upon what type of account you have. You may opt out of receiving marketing/promotional text messages from Kush at any time by replying STOP to a marketing/promotional text message. If you opt out of receiving marketing/promotional emails and/or text messages, we may still send you non-promotional emails, such as emails about your accounts or our ongoing business relations.

Choices for Cookies and Similar Technologies. See the Cookies and Similar Technologies section for choices about cookies and other analytics and advertising controls.

Many third-party tracking companies are also members of associations, which provide a simple way to opt out of analytics and ad targeting, which you can access at:

US: NAI www.networkadvertising.org

US: DAA www.aboutads.info

Canada: DAA <https://youradchoices.ca>

Europe: DAA www.youonlinechoices.com

Mobile advertising ID controls. Apple and Android mobile devices each generate an advertising identifier that can be accessed by apps and used by advertisers in much the same way that cookies are used on websites. Each operating system provides options to limit tracking and/or reset the advertising ID.

You may decline to share certain data with Kush, in which case we may not be able to provide you with some of the features and functionality of the Applications or Services. You may have the right to know what personal information

Kush has about you and to correct any inaccuracies. Please direct any such requests by email to customer support or by one of the other means listed at the end of this Notice.

10. Your EU Privacy Rights

If the processing of personal data about you is subject to European Union data protection law, you have certain rights with respect to that data:

- A. You can request access to, and rectification or erasure of, personal data;
- B. If any automated processing of personal data is based on your consent or a contract with you, you have a right to transfer or receive a copy of the personal data in a usable and portable format;
- C. If the processing of personal data is based upon your consent, you can withdraw consent under certain circumstances; and
- D. For residents of France, you can send us specific instructions regarding the use of your data after your death.

To make such a request, contact us at the contact information set forth below. When we are processing data on behalf of another party that is the “data controller,” you should direct your request to that party. You also have the right to lodge a complaint with a supervisory authority, but we encourage you to first contact us with any questions or concerns.

We rely on different lawful bases for collecting and processing personal data about you, for example, with your consent and/or as necessary to provide the Services you use, operate our business, meet our contractual and legal obligations, protect the security of our systems and our customers, or fulfill other legitimate interests.

11. California Privacy Rights

If you are a California resident and the processing of personal information about you is subject to the California Consumer Privacy Act (“CCPA”), you have certain rights with respect to that information.

Right to Know. You have a right to request that companies provide you with the following information:

- A. The categories and specific pieces of personal information that we have collected about you.
- B. The categories of sources from which we collect personal information.
- C. The purposes for collecting, using, or selling personal information.
- D. The categories of third parties with which we share personal information.
- E. The categories of personal information we have disclosed about you for a business purpose. Note that the CCPA defines “business purpose” broadly; and because we use service providers for a number of business purposes that require access to our systems that hold personal information (such as supplying cloud data storage,

maintaining the security of our systems, and providing customer support), in the past 12 months we have disclosed for a business purpose data from each of the categories of personal information we maintain.

- F. The categories of personal information we have sold about you (if any), for each category of third parties to which the personal information was sold. Note that the CCPA defines “sell” and “personal information” very broadly, and some of our data sharing described in this Notice may be considered a “sale” under that definition. In particular, we let advertising and analytics providers collect IP addresses, cookie IDs, and Mobile IDs through our Applications when you use our online services, but do not “sell” any other types of personal information. We provide our “Do Not Sell My Info” disclosures in the Cookies and Similar Technologies section of this Notice.

You may make such a “request to know” by contacting us at support@kush.com. Note that we have provided much of this information in this Notice.

Right to Request Deletion. You also have the right to request that we delete personal information under certain circumstances, subject to a number of exceptions. To make a request to delete, contact us at support@kush.com.

Right to Opt-Out. You have a right to opt-out from future “sales” of personal information. To do so, please visit our “Do Not Sell My Info” page in the Cookies and Similar Technologies section of this Notice.

You may designate, in writing or through a power of attorney, an authorized agent to make requests on your behalf to exercise your rights under the CCPA. Before accepting such a request from an agent, we will require the agent to provide proof you have authorized it to act on your behalf, and we may need you to verify your identity directly with us. Further, to provide or delete specific pieces of personal information we will need to verify your identity to the degree of certainty required by law. Finally, you have a right not to be discriminated against for exercising rights set out in the CCPA.

Additionally, under California Civil Code Section 1798.83, as known as the “Shine the Light” law, California residents who have provided personal information to a business with which the individual has established a business relationship for personal, family or household purposes (“California Customers”) may request information about whether the business has disclosed personal information to any third parties for the third parties’ direct marketing purposes. Please be aware that we do not disclose personal information to any third parties for their direct marketing purposes as defined by this law. California Customers may request further information about our compliance with this law by emailing support@kush.com. Please note that businesses are required to respond to one request per California Customer each year and may not be required to respond to requests made by means other than through the designated email address.

12. Changes/Updates to this Privacy Notice

From time to time, we may revise this Notice to reflect changes in our Applications and Services, how we use information, or applicable law. To help you stay current of any changes, we note the date of Privacy Notice was last updated above. If we make material changes to the Notice, we will provide notice or obtain consent regarding such changes as may be required by law.

13. Kush Contact Information

Please contact Kush with any questions, concerns, complaints or comments about this Notice, your information, our third-party disclosure practices, or your consent choices:

support@kush.com

Privacy Policy – Version 2.1

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