



Privacy Policy

GlobAgro Corp. and its subsidiaries (collectively,) are committed to maintaining the accuracy, confidentiality and security of your personal information. This Privacy Policy describes the personal information that GlobAgro Corp. collects from or about you, as well as how we use and to whom we disclose that information. Please review this entire document carefully. It is GlobAgro Corps policy to comply with the privacy legislation within each jurisdiction in which we operate. Sometimes such legislation and / or an individual’s right to privacy are different from one jurisdiction to another. This Privacy Policy covers only those activities that are subject to the provisions of Canada’s federal and provincial privacy laws, as applicable. This Privacy Policy has a limited scope and application. Consequently, the rights and obligations contained in this Privacy Policy may not be available to all individuals or in all jurisdictions.

What is Personal Information

For the purposes of 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 purposes of enabling the individual to be contacted in relation to their business responsibilities.

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;
- additional service-related information concerning the products or services that we provide to, or receive from, you; and
- payment information, including your credit card information.

We may also collect market-related information, which may include personal information, concerning market trends and activities impacting our business. We may also collect information related to our media, investor and public relations activities, and information related to our interactions with financial and other advisors.

In most circumstances where the personal information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you, or implied from your actions).



From time to time, we may utilize the services of third parties and may receive personal information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your personal information to us.

GlobAgro Corps operations include activities related to operating agriculture facilities and agriculture production facilities as well as the distribution of agricultural products. As such, GlobAgro Corp. may also collect personal information from individuals participating in and / or impacted by those activities.

Our Websites

We may collect information related to your visit to any of our websites, including the IP address and domain used to access our websites, the type and version of your browser, the website you came from to access our website(s), the page you entered and exited at, any website page within our website(s) that is viewed by that IP address and what country you are from. We use this information to monitor our websites' performance (such as number of visits, average time spent, page views) and for our business purposes such as: (i) customizing certain content that we think you might like; (ii) improving our products and services; and (iii) upgrading our websites.

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 our websites to identify you and to record your passwords and preferences. The cookie allows us to track your visit to our website(s) so that we can better understand your use of our website(s) so that we can customize and tailor them to better meet your needs. Most web browsers are set to accept cookies. However, on most web browsers you may change this setting to have your web browser either: (i) notify you prior to a website placing a cookie on your hard drive so that you can decide whether or not to accept the cookie; or (ii) automatically prevent the placing of a cookie on your hard drive. It should be noted that if cookies are not accepted, you may not be able to access a number of web pages found on our websites.

Our websites may contain links to other websites that may be subject to less stringent privacy standards. We cannot assume any responsibility for the privacy practices, policies or actions of the third parties that operate these websites. GlobAgro Corp. is not responsible for how such third parties collect, use or disclose your personal information. You should review the privacy policies of these websites before providing them with personal information.



Why Do We Collect Personal Information?

GlobAgro Corp. 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 so that we may provide you with, or receive from you, the products and services that have been 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 protect GlobAgro Corp. against error, fraud, theft and damage to our goods and property;
- to enable us to comply with applicable law or regulatory process; and
- any other reasonable purpose to which you consent.

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.

When Do We Disclose Your Personal Information?

We may 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.

In addition, personal information may be disclosed or transferred to another party during the course of, or completion of, a change in ownership of or the grant of a security interest in, all or a part of GlobAgro Corp. through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.



Finally, your personal information may be disclosed:

- for the purposes described in this Privacy Policy;
- 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 GlobAgro Corp;
- to protect the rights and property of GlobAgro Corp.; and
- with your consent.

The Importance of Your 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 endeavor to advise you 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 our Chief Legal Officer, who also acts as GlobAgro Corp's Chief Privacy Officer, using the contact information set out below. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to our Chief Legal Officer.

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.



How Is Your Personal Information Protected?

GlobAgro Corp. 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. Unfortunately, we cannot guarantee complete security: (i) unauthorized access, use, or disclosure, (ii) hardware or software failure, and (iii) other events may potentially compromise the security of your personal information.

The security of your personal information is important to us, please advise our Chief Legal Officer immediately of any incident involving the loss of or unauthorized access to or disclosure of personal information that is in our custody or control.

Updating Your Personal Information

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes.

In some circumstances we may not agree with your request to change your personal information and will instead append an alternative text to the record in question.

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 our Chief Legal Officer. 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 our Chief Legal Officer.

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.

Privacy Officer

We have appointed our General Counsel to oversee compliance with this Privacy Policy and help us manage and monitor our compliance with privacy legislation. The contact information for our Chief Legal Officer is as follows:

GlobAgro Corp.
5500 North Service Road, Suite 301
Burlington, Ontario L7L 6W6
Canada

E-mail: info@globagrocorp.com
Telephone: 905-633-1300

Attention: Privacy Policy

Inquiries or Concerns

If you have any questions about this Privacy Policy or concerns about how we manage your information, please contact our General Counsel by telephone, in writing or by e-mail. We will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you. If you are dissatisfied with our response, you may be entitled to make a written submission to the Privacy Commissioner in your jurisdiction.

GlobAgro Corp, 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 websites, and we encourage you to refer back to it on a regular basis.

This Privacy Policy was last updated on March 11, 2019.

Any interpretation associated with this Privacy Policy will be made by our General Counsel. This Privacy Policy includes examples but is not intended to be restricted in its application to such examples; therefore, where the word “including” is used, it shall mean “including without limitation”.

This Privacy Policy does not create or confer upon any individual any rights or impose upon GlobAgro Corp. any rights or obligations outside of, or in addition to, any rights or obligations



imposed by Canada's federal privacy laws and its provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and any such laws, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.