

PaySpyre Financial Inc.

Personal Information Protection Policy

Last updated: December 20th, 2022

At PaySpyre Financial Inc. (“PaySpyre”), we are committed to providing our clients with exceptional service. As providing this service involves the collection, use and disclosure of some Personal Information about our clients, protecting their Personal Information is one of our highest priorities. Accordingly, PaySpyre has established this Personal Information Protection Policy (the “Privacy Policy”) in compliance with British Columbia’s Personal Information Protection Act (PIPA), which outlines the principles and practices we will follow in protecting clients’ Personal Information. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients’ Personal Information and allowing our clients to request access to, and correction of, their Personal Information.

This Privacy Policy applies to PaySpyre, and to any service providers collecting, using or disclosing Personal Information on behalf of PaySpyre. We reserve the right to amend this Privacy Policy in our sole discretion at any time by posting a revised version on the Platform. If you continue to use the Platform after the effective date of each amendment, you will be conclusively deemed to have accepted such amended version of this Privacy Policy.

Definitions

Personal Information – means information about an identifiable individual. Personal information does not include contact information (described below).

Contact information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Contact information is not covered by this Privacy Policy or PIPA.

Aggregate Data – means information that has been aggregated in a manner that does not reveal any Personal Information and cannot reasonably be used to identify the client as the source of such data.

Platform – means collectively, the platform operated by PaySpyre at www.payspyre.com, and all associated subdomains, as made available from time to time.

Privacy Officer – means the individual designated responsibility for ensuring that complies with this Privacy Policy and PIPA.

Cookies – Cookies are files with a small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your computer’s hard drive.

Log Data – Log Data may include information such as your computer’s Internet Protocol (“IP”) address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, and the time spent on those pages and other statistics.

Policy 1 – Collecting Personal Information

- 1.1 Unless the purposes for collecting Personal Information are obvious and the client voluntarily provides his or her Personal Information for those purposes, we will communicate the purposes for which Personal Information is being collected, either orally or in writing, before or at the time of collection.
- 1.2 We will only collect information from our clients that is necessary to fulfill the following purposes:
 - To verify identity;
 - To verify creditworthiness, including but not limited to instant bank verification;
 - To identify client preferences;

- To understand the financial needs of our clients;
 - To open and manage an account and provide access to PaySpyre's Platform;
 - To deliver requested products and services, including but not limited to loan agreements;
 - To send Platform notifications and status updates;
 - To send out membership information;
 - To ensure a high standard of service to our clients;
 - To meet regulatory requirements; and
 - To collect and process payments.
- 1.3 We use cookies to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.
- 1.4 We collect Log Data information that your browser sends whenever you visit our Site.

Policy 2 – Consent

- 2.1 We will obtain client consent to collect, use or disclose Personal Information (except where, as noted below, we are authorized to do so without consent).
- 2.2 Consent can be provided orally, in writing, electronically, through an authorized representative, through the Platform, or it can be implied where the purpose for collecting using or disclosing the Personal Information would be considered obvious and the client voluntarily provides Personal Information for that purpose.
- 2.3 Consent may also be implied where a client is given notice and a reasonable opportunity to opt-out of his or her Personal Information being used for mail-outs, the marketing of new services or products, notifications and the client does not opt-out.
- 2.4 Clients may withhold or withdraw their consent for PaySpyre Financial to use their Personal Information in certain ways, except in those circumstances where the Personal Information is necessary to provide the service or product, or the withdrawal of consent would frustrate the performance of a legal obligation.
- 2.5 We may collect, use or disclose Personal Information without the client's knowledge or consent in the following limited circumstances:
- When the collection, use or disclosure of Personal Information is permitted or required by law;
 - In an emergency that threatens an individual's life, health, or personal security;
 - When the Personal Information is available from a public source (e.g., a telephone directory);
 - When we require legal advice from a lawyer;
 - For the purposes of collecting a debt;
 - To protect ourselves from fraud; and
 - To investigate an anticipated breach of an agreement or a contravention of law
- 2.6 You acknowledge and agree that we may collect or generate Aggregate Data in connection with access to the Platform and/or providing the client a particular service or product, and the client hereby grants PaySpyre and its service providers consent to use, reproduce, modify, adapt, create derivative works from, publicly perform, publicly display, distribute, sell, make and have made Aggregate Data for any lawful purpose.

Policy 3 – Using and Disclosing Personal Information

- 3.1 We will only use or disclose client Personal Information where necessary to fulfill the purposes identified at the time of collection or for a purpose reasonably related to those purposes such as:
- To facilitate the arrangement and implementation of loan agreement(s), which may include (but is not limited to) disclosure to third-party providers to complete bank verifications and obtain bank account data;

- To conduct client surveys in order to enhance the provision of our services;
 - To contact our clients directly about products and services that may be of interest;
- 3.2 We require those service providers and third-parties engaged by PaySpyre to agree to use your Personal Information only for the purposes for which it is provided to them, and to protect the privacy of your Personal Information in a matter consistent with this Privacy Policy.
- 3.3 Our Site may contain links to other sites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. PaySpyre has no control over and assumes no responsibility for the content, privacy policies, or practices of any third-party sites or services.
- 3.4 We may disclose or sell Aggregate Data to other persons or third-parties, in our sole discretion.
- 3.5 Except as otherwise outlines in this Privacy Policy, we will not use or disclose client Personal Information for any additional purpose or sell Personal Information unless we obtain consent to do so.

Policy 4 – Retention Policy

- 4.1 If we use client Personal Information to make a decision that directly affects the client we will retain that Personal Information for at least one year so that the client has a reasonable opportunity to request access to it.
- 4.2 Subject to policy 4.1, we will retain client Personal Information only as long as necessary to fulfill the identified purposes or a legal or business purpose.
- 4.3 We may permanently retain Aggregate Data for future use.
- 4.4 We will store your Personal Information in Canada.

Policy 5 – Ensuring Accuracy of Personal Information

- 5.1 We will make reasonable efforts to ensure that client Personal Information is accurate and complete where it may be used to make a decision about the client or disclosed to another organization.
- 5.2 Clients may use the Platform to correct their Personal Information in order to ensure its accuracy and completeness.
- 5.3 If the Personal Information is demonstrated to be inaccurate or incomplete, we will correct the information as required or request that the Client provide corrected information.

Policy 6 – Securing Personal Information

- 6.1 We are committed to ensuring the security of client Personal Information in order to protect it from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks.
- 6.2 We employ reasonable security safeguards appropriate to the sensitivity of the Personal Information in our possession or under our control in order to protect that information from unauthorized access, collection, use, disclosure, copying, modification or disposal or similar risks. Only those persons who need to have access to your Personal Information in order to carry out their duties with respect to the uses set out above will have access to your Personal Information. Nevertheless, security risks cannot be eliminated and PaySpyre cannot guarantee that your Personal Information will not be used or disclosed in ways not otherwise described in this Privacy Policy.
- 6.3 We will continually review and update our security policies and controls as technology changes to ensure ongoing Personal Information security.

Policy 7 – Providing Clients Access to Personal Information

- 7.1. Clients have a right to access their Personal Information, subject to limited exceptions, including:

- Aggregate data
 - solicitor-client privilege;
 - disclosure would reveal Personal Information about another individual; and/or
 - health and safety concerns.
- 7.2. A request to access Personal Information must be made in writing and provide sufficient detail to identify the Personal Information being sought.
 - 7.3. Upon request, we will also tell clients how we use their Personal Information and to whom it has been disclosed if applicable.
 - 7.4. We will make the requested information available within 30 business days, or provide written notice of an extension where additional time is required to fulfill the request.
 - 7.5. A minimal fee may be charged for providing access to Personal Information. Where a fee may apply, we will inform the client of the cost and request further direction from the client on whether or not we should proceed with the request.
 - 7.6. If a request is refused in full or in part, we will notify the client in writing, providing the reasons for refusal and the recourse available to the client.

Policy 8 – Questions & Complaints: The Role of the Privacy Officer or designated individual

- 8.1. The Privacy Officer is responsible for ensuring PaySpyre’s compliance with this Privacy Policy and the Personal Information Protection Act.
- 8.2. Clients should direct any complaints, concerns or questions regarding PaySpyre’s compliance in writing to the Privacy Officer. If the Privacy Officer is unable to resolve the concern, the client may also write to the Information and Privacy Commissioner of British Columbia.

Contact PaySpyre’s Privacy Officer at: privacy@payspyre.com