

FLEXITI'S PRIVACY POLICY

FLEXITI'S COMMITMENT TO PRIVACY

Flexiti is committed to providing you with exceptional service. Providing this service involves the collection, use and disclosure of personal information as set out in this Privacy Policy. Personal information refers to any information that identifies you as an individual. Protecting this information is one of our highest priorities. When you apply for an account with Flexiti, we inform you of why and how we collect, use and disclose your personal information and obtain your consent to do so. Our privacy commitment includes ensuring the accuracy, confidentiality and security of your personal information.

SCOPE OF THIS POLICY

In this Privacy Policy, the words **"us"**, **"we"** and **"Flexiti"** mean Flexiti Financial Inc., FLX Holding Corporation and their subsidiaries and the words **"you"** and **"your"** mean the individual whose information may be collected, used and/or disclosed. **"Merchant Partners"** means all businesses in the Flexiti Network with whom you may use your FlexitiCard.

This Privacy Policy applies to all of Flexiti's business activities and to all of our Websites (including, www.flexiti.com, www.flexitifinancial.com, www.flexiti.ca, www.flexitifinanciere.ca, www.flexitifinanciere.com, portal.flexiti.fi, my.flexiti.com and www.flexiti.fi) each of these websites is individually referred to as **"Website"**, or collectively as **"Websites"**.

If you are an individual who has applied for credit with us or if you are an account holder, this Privacy Policy applies to your personal information. This Privacy Policy also applies to the personal information of individual owners of sole proprietorships and the personal information of Merchant Partner guarantors, principals, owners, directors and officers. This Privacy Policy also applies in respect of your personal information that is shared with our affiliates, Merchant Partners and service providers that collect, use, disclose or store personal information on behalf of Flexiti.

CHANGES TO OUR PRIVACY POLICY

Flexiti occasionally updates its Privacy Policy. If we make changes to this Privacy Policy, we will post these changes here. If you are a Flexiti account holder, we will notify you of any significant changes to our Privacy Policy if they apply to you.

PERSONAL INFORMATION COLLECTED BY FLEXITI

To provide you with the requested products and services, we must collect personal information from you, which includes:

- Your contact information, including your name, address, telephone number and email address;
- Your identifying information, including your date of birth, social insurance number (optional), information from your driver's license or other government identification;
- Information we use to authenticate you, such as your mother's maiden name or your personal

identification word;

- Your financial information including income, expenses, assets and liabilities;
- Your credit information (such as credit history, payment history and account details pertaining to other credit accounts you have, payment history and details pertaining to your Flexiti account, and all other personal information that affects your credit that has been provided to you or that you have applied for);
- Your banking information;
- Information about your interests and purchasing preferences; and
- Your location information, including your internet protocol ("IP") address and geo-location data.

HOW YOUR PERSONAL INFORMATION IS COLLECTED BY FLEXITI

We collect information about you in the following ways:

- Information you provide us through in-store applications;
- Information you provide us through applications via a Merchant Partner website;
- Information you provide us through the online forms and applications on our Websites;
- Information that you provide us when you contact us by email or phone;
- Information that we receive from third party service providers in the course of verifying and authenticating your identity;
- Information you provide or generated in the course of you doing business with us, including details of your purchases and other transactions;
- Information from credit reporting agencies and/or credit bureaus;
- Information collected by cookies or other technologies on our Websites;
- Information that we receive from our affiliates; and
- Transaction information our Merchant Partner(s) share with us.

HOW YOUR PERSONAL INFORMATION IS USED BY FLEXITI

We use the personal information collected from you for the following reasons:

- **Account Administration:**
 - To open, manage and administer your account, which includes,
 - making decisions about your applications, accounts and transactions;
 - verifying and authenticating your identity; and
 - evaluating your creditworthiness and conducting risk assessments;
 - If you choose to give us your social insurance number (optional), to match credit bureau files and verify your identity;
 - To understand your credit, financial, and insurance needs;
 - To assign or sell your account, or amounts owing under your account to a third party;
 - To enforce our agreements with you and collect amounts owing to us; and
 - To deliver products and services to you, to service your account and to respond to your requests about applications, accounts and our services.
- **Secondary Purposes:**
 - To send you marketing information about Flexiti and our affiliates, Merchant Partners

- or service providers;
 - To promote the products and services of Flexiti, our affiliates, Merchant Partners or service providers;
 - To allow our affiliates, Merchant Partners or service providers to promote their products and services directly to you; and
 - To determine what products and services to market to you and to create new products and services.
- **Other Business Purposes:**
 - To fulfill the purposes identified at the time of collection;
 - To perform data analytics;
 - To investigate, mitigate and prevent potential or actual fraud;
 - To ensure a high standard of service to our account holders and our Merchant Partners, including the resolution of any issues;
 - To tailor and improve our products, services, processes and Websites to meet the needs of our applicants, account holders and Merchant Partners;
 - To meet legal, regulatory, security and internal policy requirements, including any requirements that may be applicable to our service providers;
 - To ensure quality control, internal training, and record-keeping purposes, your telephone conversations with our representatives will be monitored and/or recorded;
 - To provide credit reporting agencies with information about you and your account, which helps them establish your credit history and supports the credit granting process;
 - To investigate an anticipated breach of an agreement or a contravention of law; and
 - For such other purposes as we may identify to you from time to time or as permitted or required by law.

WHO CAN ACCESS YOUR INFORMATION?

Your personal information will be accessed by our employees, agents and service providers in connection with the purposes described above. We may disclose your personal information (including credit bureau information) to our affiliates, service providers and Merchant Partners to fulfill the purposes identified above or otherwise at the time of collection. These companies may use your personal information for their own business purposes, including marketing, customer service, fulfillment and related purposes. Additionally, we may disclose your personal information to Flexiti affiliates for customer support, data analysis, marketing, technical operations, account administration purposes and to improve Flexiti and our affiliates' services.

If you have purchased creditor insurance, we collect information on behalf of and share information with the insurance provider to help sell and administer the insurance to you and facilitate claims.

Flexiti, and the third parties with whom we share your personal information in accordance with this Privacy Policy, may contact you by email, text, SMS, instant message, telephone or in writing, using the contact information you provided to us.

WITHDRAWING CONSENT FOR SECONDARY PURPOSES

Subject to certain exceptions, you can withdraw your consent for us to use or disclose your personal information with affiliates, service providers and Merchant Partners for promotional, marketing or related secondary purposes, as long as you give reasonable notice of withdrawal. You may choose to opt-out from promotional electronic and other communications at any time by contacting us at 1-877-259-3745. You may unsubscribe from emails from Flexiti by following instructions found in email communications from us.

RETAINING PERSONAL INFORMATION

We keep information for so long as it is reasonably required by us or legally necessary for us to retain such information. If personal information has been used to make a decision about you, we will keep the personal information long enough for you to have access to it after the decision has been made.

DISCLOSURE OF PERSONAL INFORMATION OUTSIDE OF CANADA

Flexiti and its service providers may process and store personal information outside of Canada, including in Argentina, Australia, New Zealand, Panama, the Philippines, the United Kingdom and the United States. While outside of Canada, personal information will be subject to applicable foreign laws, which may not afford the same level of protection to personal information as the laws of Canada.

SECURING PERSONAL INFORMATION

We are committed to ensuring the security of your personal information to protect it from unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks. We store much of your information electronically. We protect personal information with safeguards appropriate to the sensitivity of the information. However, no method of transmission over the internet, or method of electronic storage, is 100% secure. Therefore, while we strive to protect your personal information, we cannot guarantee its absolute security. If a password is used to protect your account and personal information, it is your responsibility to keep your password confidential.

We also have organizational processes in place to limit access to your personal information by our affiliates, personnel, third parties, Merchant Partners and service providers collecting, using or disclosing personal information on our behalf. Where applicable, personal information will be destroyed using appropriate security measures.

ACCESS TO PERSONAL INFORMATION

You have a right to access your personal information, subject to limited exceptions. A request for personal information must be in writing and provide sufficient detail to identify the personal information sought. A request to access personal information should be made by contacting us at the address set out below. If a request is refused in full or in part, we will notify you in writing, providing the reasons for refusal.

INTEREST-BASED ADVERTISING

Flexiti engages in interest-based advertising. We work with advertising companies that use their own technologies (including cookies) on our Websites and other websites to provide you with tailored advertisements across the internet on third party websites (including on social media platforms). These companies may collect information about your activity on our Websites and other websites you visit and your interaction with our advertising and other communications and use this information to make predictions about your preferences and deliver tailored advertising to you. This information may also be used to evaluate our online advertising campaigns.

Opting-Out of Interest-Based Advertising:

For more information about interest-based advertising, including how you can opt-out of receiving interest-based advertising from third-party advertising companies participating in the Digital Advertising Alliance of Canada (DAAC) Self-Regulatory Program for Online Interest-Based Advertising, please visit the DAAC website at <http://youradchoices.ca/choices>.

If you opt-out of interest-based advertising by a third party, these technologies may still collect data for other purposes, including analytics, and you will still see non-targeted Flexiti ads across the internet.

Interest-based advertising opt-outs work by saving cookies in your browser that tell the various ad partners that you have opted-out. You must opt-out from each web browser from which you do not want to receive interest-based advertising, and you must do so on all of your devices, because your choice will only apply to the web browser from which you opt-out. If you delete or clear your browser's cookies, you will need to opt-out again.

COOKIE-BASED INFORMATION

Cookies, web beacons, pixel tags or other technologies may be used by Flexiti on our Websites. Some of the cookies are set by us and others are set by third parties who deliver services on our behalf. We use cookies on our Websites to save visitor preferences and passwords. Cookies are also used to identify which areas of the Website are popular, which areas need improvement and how to target certain advertising to our Website visitors. We collect the IP addresses of all visitors to our Websites and other information such as page requests, browser type, operating system and average time spent on our Websites. We use this information to help us understand our Website activity and to monitor and improve our Websites.

We do not use cookies to collect personal information except for your age, gender, and interests, and in connection with password-protected online services. We may combine your visit and navigational information with personal information that you provide. By visiting a Website, you are consenting to this collection and use of your personal information. Visitors may visit the Website with its cookies turned off to avoid the collection of cookie-based information; however, by turning off cookies, you will be unable to access the password-protected areas of the Website. If you would like to learn more about how to set your cookie options, please refer to your browser's documentation or online help for instructions.

We use cookies for the following purposes:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our Websites. They include, for example, cookies that enable you to log into secure areas of our Websites.
- **Functionality cookies.** These cookies are used to recognize you when you return to our Websites. This enables us to customize your online experience (for example, by remembering your choice of language or region).
- **Analytical cookies.** We may use a third party such as Google to help us gather and analyze information about the areas visited on the Websites (for example, the pages most read, time spent, search terms and other engagement data) to evaluate and improve the user experience and the Websites. For more information or to opt-out from using the Google Analytics opt-out browser add-on, see “How Google uses data when you use our partners’ sites or apps”.
- **Advertising cookies.** These cookies help us make the advertising displayed to you more relevant to your interests and to help us measure the effectiveness of our advertising on other websites. Please see “Interest-Based Advertising ” above for more information with respect to Flexiti’s use of advertising cookies and your choices.

ACCURACY AND ACCESS

We will make reasonable efforts to ensure that your personal information is accurate and complete where it may be used to make a decision about you or disclosed to another company. You may request correction to your personal information to ensure its accuracy and completeness. A request to correct your personal information must be made by telephone or in writing to the email address below and provide sufficient detail to identify the personal information and the requested correction.

QUESTIONS, CONCERNS AND COMPLAINTS

You may direct any questions, concerns or complaints regarding this Privacy Policy and our privacy practices to our Privacy Officer using the contact information below.

Flexiti Financial Inc.
Attention: Privacy Officer
250 University Ave, Suite 600
Toronto ON, M5H 3E5
Email: privacyoffice@flexiti.com
Phone: 1-877-259-3745 (Customer Service)