

Overview

ShopEpay Financial. and its subsidiaries, affiliates, and related entities ("**ShopEpay Financial**", "**we**", "**us**", "**our**") are committed to respecting your privacy and protecting the personal information we collect, use and disclose in the course of our business, in accordance with applicable laws and regulations. This privacy policy ("**Privacy Policy**") outlines our privacy practices in respect of managing personal information and safeguarding the privacy of individuals who provide us with personal information to obtain our products and services through our websites, including but not limited to <https://www.shopepayfinancial.com> and <https://www.shopepay.ca> (the "**Websites**"). This Privacy Policy also covers ShopEpay Financial's payment applications as well as our social media sites including but not limited to Facebook, LinkedIn, and Instagram.

In this Privacy Policy, we describe the types of personal information we collect about you, why we collect it, how we use it, how we protect it and under what circumstances we share it with third parties. This Privacy Policy also describes your rights related to your personal information and the decisions you can make about your personal information with respect to us.

In addition to the privacy practices outlined in this Privacy Policy, we have established and implemented comprehensive policies, procedures, and contractual measures to protect the personal information that we collect, use, and disclose. To ensure accountability, we have trained our employees and contracted staff in respect of this Privacy Policy and provide privacy and information security awareness training for employees.

This Privacy Policy does not outline the privacy practices of third-party companies with whom you and we may interact. We encourage you to contact third-party companies directly if you want to learn more about the privacy practices and security safeguards of such companies.

For the purpose of this Privacy Policy, "personal information" shall include any factual or subjective information about an identifiable individual.

This Privacy Policy does not apply to the personal information of employees, contracted staff or prospective employees. We maintain additional practices with respect to such information.

Acceptance of Privacy Policy

By submitting your personal information to ShopEpay or by otherwise using our Websites, you signify your consent to the collection, use and disclosure of your personal information in accordance with this Privacy Policy.

We reserve the right to amend this Privacy Policy at any time by posting a revised version on our Websites. We recommend that you check the Websites periodically in order to review our current Privacy Policy. You can tell if this Privacy Policy has changed by checking the effective date that appears at the top of this Privacy Policy. Depending on the circumstances, we may also decide to send you a notice electronically that the Privacy Policy was changed. If you continue to access or use the Websites or our products or services after this Privacy Policy has changed or notice of the change has been given, you will be deemed to have accepted such changes.

Consent

As mentioned, ShopEpay will only collect, use or disclose personal information in accordance with applicable laws and regulations and this Privacy Policy. We obtain consent before we collect, use or disclose your personal information for certain identified purposes. We normally request your consent in writing, however, we may accept your oral consent or imply your consent through your conduct with us and/or your acceptance of our products or services in certain instances.

Subject to the legal and contractual obligations between ShopEpay and you and reasonable notice from you, you may refuse or withdraw your consent to certain of the identified purposes at any time by contacting us. The period of reasonable notice will vary depending on the nature of the information and its purpose. There is no obligation on ShopEpay to cease any use or retract any disclosure made prior thereto.

If you provide ShopEpay or its service providers with personal information of another individual, you represent and warrant that you have all necessary authority and/or have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Privacy Policy.

What Information We Collect and How We Collect It

ShopEpay collects personal information by lawful means. We may collect the following information from you in the following contexts:

Directly From You

When you provide your personal information to us for any purpose such as accessing our products or services, creating an account with us, submitting application(s) for products or services, uploading or submitting information through the Websites, including through the payment application and our chat box, or contact us to obtain our products or services, you may voluntarily provide us with certain personal information including but not limited to: your first and last name; postal address; phone number; date of birth; gender; e-mail address;

marital status; account credentials; social media identifiers; social insurance number; driver's license information; passport number; payment and financial information such as your credit or debit card information, bank account information, outstanding balances, loan history or bill payment history (including account numbers in some cases); health status; current and historical employment details such as employment status, history and compensation; education information such as your education history and student loan financial information; and vehicle insurance information.

Credit Reporting Agencies

Depending on your interactions with us and your use of our products and services, including but not limited to making a loan application, we may obtain, and continue to periodically obtain, your credit score, credit reports, and other relevant information from a credit reporting agency. This information will only be obtained to process a transaction, facilitate an application for an automobile financing, provide our products or services to you or to act in accordance with any agreement between you and ShopEpay.

Financial Institutions

We collect personal information from institutions that offer financial products or services to consumers, such as insurance brokers, and others that have obtained your consent to disclose such information to us. Such financial institutions may include banks, mortgage lenders, loan brokers, financial or investment advisors, insurance companies and debt collectors.

Vehicle Dealers

We may collect information that vehicle dealers provide to us on your behalf. Such information may be of a similar nature as the information we collect directly from you, as well as your credit score and credit reports.

Other Third Parties We Work With

We may collect information from companies that we do business with in connection with offering our products and services to individuals. Such entities may include: marketing and advertising providers, service providers that assist us in the operation of our business (for example, lease tracking service providers or information technology services providers) or other third parties.

Surveys

When you complete a survey of ours, we may collect the information that you provide to us in accordance with this Privacy Policy and we may disclose that information on a deidentified, anonymized, or aggregated basis to third parties.

Automated Data Collection

The Websites may use cookies to analyze traffic. Cookies enable us to track and target the interests of our users to enhance the experience on our site. This information is not personally identifiable on its own and can be used for aggregate website traffic and trend analysis. Such information may include domain names and internet protocol (IP) addresses, usage statistics (e.g., types of web browsers and operating systems used) and browsing history. Below, this Privacy Policy addresses our activities with respect to tracking and behavioural advertising.

Electronic Communications

If you provide us with your contact information, we may collect the information that you provide to us to communicate with you through electronic means, such as by sending you e-mails or "SMS" messages.

Support Services

If you e-mail, fax, write to us, or otherwise contact us, we may collect your name, account details and contact information.

To confirm, we use different methods to collect your personal information, including:

- through direct interactions with you;
- automatically, through cookies and other automated data collection technologies or interactions, as you navigate through the Websites; and
- through the parties that we work with and/or that you consent to us working with when we provide you with our products or services.

Why We Collect, Use and Disclose Your Personal Information

ShopEpay collects, uses and discloses your personal information for the purposes identified at the time of or before collection, or as otherwise permitted or required by applicable law, including, as applicable, for the following purposes:

- to provide you with our products and services and to facilitate financing or other applications or transactions that you may choose to enter into;

- to identify and verify you, and your eligibility to use our products or services and the Websites;
- to assist us with providing you access to the Websites, social media sites and your user accounts as well as a positive and secure experience on the Websites and social media sites;
- to communicate with you for the purposes you indicate when you sign up to receive our products or services or to access and use the Websites;
- to provide you with details about new products or services releases, new partnerships and other important information;
- to advertise and promote our products and services to you (see below on our behavioural advertising practices);
- to learn more about you and your product or service preferences and to personalize your experience;
- to provide you with customer support services and to process your purchases of any of the products or services offered on the Websites;
- to manage and administer our business, and to address problems with, and to improve, our Websites including their design, services and offerings;
- to identify and protect against fraud and other criminal activities;
- to carry out our obligations or enforce our legal rights or the rights of those who interact with us, including but not limited to those obligations and rights arising from any contracts we may have with you or other parties;
- to comply with legal or regulatory requirements or to protect our safety or the safety of others;
- to detect, prevent and respond to security incidents or other malicious, deceptive, fraudulent or illegal activity;
- to fulfill the purposes for which you provided the personal information or that were described when it was collected; and
- to act in accordance with any other purpose with your consent.

If we intend on using any collected personal information for a purpose not previously identified, the new purpose shall be identified prior to use. Unless the new purpose is required by law, consent will be obtained before the information is used for that purpose.

Wherever possible, ShopEpay limits the amount of personal information it collects, uses or discloses as necessary and appropriate to more efficiently operate our business and serve you.

Disclosure of Your Personal Information

- vehicle dealers/ repair shops or other independent businesses in relation to a proposed or completed transaction, including but not limited to automobile financings or purchases;

- credit reporting agencies;
- business partners, such as the financial institutions and insurance companies we work with to offer you our products and services;
- our financial, insurance, legal, accounting or other advisors that provide professional services to us; and
- third party agents and other service providers that provide us administrative and other services, such as marketing and advertising services or data processing services.

We may also disclose your personal information to a third party if, in our good faith judgment, doing so is required to comply with laws or regulations; respond to a valid subpoena, order, or government request; establish or exercise ShopEpay 's legal rights or defend against legal claims; investigate, detect, suppress, prevent or take action regarding illegal or prohibited activities, suspected fraud, situations involving potential threats to the reputation or physical safety of any person; or as otherwise required by law.

If ShopEpay is to be sold, merged or amalgamated or substantially all of its assets are to be sold or disposed of, your personal information may be transferred to a potential purchaser if, and to the extent necessary, it is required for the purposes of deciding whether to proceed with the proposed transaction and completing it. If such a sale, merger, acquisition, or disposal is completed, the purchaser may use and disclose your personal information only to the extent described in this Privacy Policy.

We may disclose your information in any other way we may describe to you when you provide the information, or for any other purpose with your consent.

We may also share de-identified, anonymized, or aggregated data with third parties for any purpose.

To the extent ShopEpay enters into arrangements with service providers, agents and contractors to store, handle or otherwise deal with personal information on its behalf, such as for data processing, document storage software support and office services, ShopEpay requires such parties by contractual or other means to provide comparable privacy protection while the information is processed or handled by them. ShopEpay uses appropriate contractual and other means to ensure that the third party will only use your personal information to perform the services ShopEpay has specified.

Where ShopEpay Stores Your Personal Information

Your personal information is stored in secure locations and on servers controlled by ShopEpay or our service providers.

Our service providers may perform activities outside of Canada. Accordingly, your personal information may be subject to the legal requirements of a foreign jurisdiction, including but

not limited to the United States, and such jurisdiction may have legal requirements that require us or service providers to disclose information to courts, law enforcement, or national security authorities.

Security of Your Personal Information

ShopEpay uses the standard safeguards applicable to its industry to protect the security of personal information in its possession, including physical, organizational, and technological measures.

These measures include:

- premises security;
- restricted access to files that contain personal information;
- technological safeguards such as security software, encryption and firewalls to prevent hacking or unauthorized computer access; and
- internal password and security policies

While ShopEpay takes appropriate measures to protect your personal information, there is always a risk that it may be lost, intercepted, or misused. ShopEpay may exchange electronic versions of documents and e-mails with you using commercially available software that may be vulnerable to attack by viruses and other destructive electronic programs. ShopEpay cannot guarantee that all communications and documents sent via e-mail will always be received, or that such communications and documents will always be virus free. ShopEpay makes no warranty with respect to the integrity of any electronic communications between us and you or with respect to the security of any such communications and you consent to such exchange of electronic communications with you, including confidential documents.

Your Decisions About Your Personal Information

At any time you can contact us to stop receiving e-mails from us, review your personal information held by us, withdraw your consent for our use and disclosure of your personal information or request a list of third parties to which ShopEpay may have provided your personal information.

While you are generally permitted to withdraw your consent, on reasonable notice, to our use and disclosure of your personal information, legal or contractual restrictions may require us to use or retain your personal information for a certain period of time. We will advise you if this is the case.

You may also amend or request a correction of your personal information in our possession or under our control, subject to certain exceptions which include information that is

prohibitively costly to provide, information that contains references to other individuals and/or another individual's personal information, information that cannot be disclosed for legal, security or commercial proprietary reasons and information that is subject to solicitor-client or litigation privilege.

Please promptly inform ShopEpay of any changes to your personal information. If you advise us that any personal information in our possession or under our control is inaccurate, incomplete, or not up-to-date, ShopEpay will take reasonable steps to correct such information.

If you contact us to do any of the items listed above, we may require you to provide sufficient personal information to allow us to identify you and tell you about the existence, use and disclosure of your personal information and this personal information will only be used for this purpose. If you are not able to provide proof of your identity, we reserve the right to refuse to send you any personal information. If you contact us about your personal information, we will respond to your request within a reasonable time and at no cost to you.

Being Denied Access to Your Personal Information

Your rights to access your personal information are not absolute. ShopEpay may deny access when:

- denial of access is required or authorized by law;
- information relates to existing or anticipated legal proceedings against you;
- granting you access would have an unreasonable impact on other people's privacy;
- protecting ShopEpay's rights and property; and
- your request is frivolous or vexatious.

ShopEpay will inform you if it denies access to you for any of the foregoing reasons.

Online Behavioural Advertising

From time to time, we may engage, or hire a third party to engage on our behalf, in online behavioural advertising based on tracking data that we collect about you. You do not have to agree to our advertising activities to receive any of our products or services. You will always have the right to opt-out of our behavioural advertising activities and may do so by contacting our Privacy Officer, listed below. For more information, please see "Our Use of Cookies on the Websites" below.

Links to Third Party Websites and Social Media Platforms

The Websites may present links to other websites. ShopEpay is not responsible for the activities of the operators of any third-party websites that the Websites may link to, including

but not limited to the collection, use, disclosure, and retention practices regarding your personal information. You should be aware that operators of linked websites may also collect your personal information generated through the use of cookies when you link to their websites. We recommend that you review the privacy policies of any third party our Websites may connect you to, before providing them with your personal information.

Collecting Personal Information of Children

Our Websites and marketing activities are not directed to children under the age of 16, and we do not knowingly collect, maintain, or use personal information from children. If we become aware that we have collected the personal information of children, we will promptly take steps to delete such personal information. If you discover your child has provided us personal information without your consent, please contact us.

Our Retention of Personal Information

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collect it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements. Personal information that is no longer required will be securely destroyed. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and deidentified data for any legitimate business purpose without further notice to you or your consent.

Our Use of Cookies on the Websites

As mentioned, we use browser tracking cookies (or "**cookies**"), which are small text files that are placed on the hard disk of a computer by a website.

We use cookies to improve your experience on our Websites. We use cookies and logs files (further defined below) to:

- recognize you when you return to our Websites;
- keep track of activity on our Websites and remember what items you have clicked on or viewed;
- study how you navigate through our Websites and which products and services you request in site searches so that we can improve the design, content and function of our Websites; and
- customize the message, content and delivery of online banner advertisements and e-mails that reflect how you navigate to and through our Websites based on your online behaviour.

Cookies are uniquely assigned to you and can only be read by a website or web server that issued the cookie to you. Types of cookies we may use include strictly necessary cookies, flash cookies and analytical cookies. You may disable certain cookies by changing your web browser settings.

We may also use browser 'log files' which record certain information when you visit a website, including your IP address.

French Language

You expressly consent to and require this Privacy Policy, and all documents related thereto, be in English. Vous consentez et exigez que cette Politique de Confidentialité, et tous les documents qui s'y rapportent, soient en anglais.

Questions & Contact Information

For more information about the privacy practices of ShopEpay, to make a complaint, or to request access to your personal information, please contact:

Jeff Franklin / President / [1-800-460-4140](tel:1-800-460-4140) Ext. 102 / jeff@shopepay.ca

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This policy and its related procedures will be reviewed as required in the event of legislative changes.