

# COLLABRIA PRIVACY POLICY

The protection of your personal information is important for Collabria. This document explains our practices in order to help you understand how we collect, use and disclose personal information. Use of your Card means that you have read, understood and that you agree with Collabria's privacy policy.

## I. Why do we collect information?

Collabria collects and updates information, including personal information, in order to:

- open a file under your name so that you may receive financial services as they relate to the various credit and payment services offered by Collabria;
- communicate with you and manage your customer file;
- analyze your profile (to, among other purposes, better understand your spending patterns) and personalize our services, offers, promotions, contests and that of our affiliates and partners including bonus points offers, promotional interest rates for balance transfers from another competitor credit card, draws or contests for trips or merchandise;
- complete your credit card application request; establish and serve you as customer; determine credit-worthiness; administer your Account, update and review your financial commitments to Collabria;
- perform services through third parties, including: determine credit-worthiness; perform collection activity, card management and distribution, authorization processing, statement processing, fraud detection and prevention, cardholder insurance benefits and rewards processing; comply with our legal and regulatory obligations including anti-money laundering or tax evasion and provide you with the services that you have asked for;
- meet tax or legal regulatory obligations;
- conduct analysis as portfolio analysis and reporting including to develop statistical models to predict individual default risk, prioritize collection actions and manage credit limits;
- reconcile Account information and perform financial analysis (with information such as your account number, purchase volume, and outstanding balance);
- protect you and Collabria from error and criminal activity, including the prevention, detection and investigation of fraud, money laundering, cyber threats and other such risks and threats;
- allow the financial institution who referred you to us to get a Collabria credit card, as well as its affiliates, partners and assignees to analyze your profile and personalize their services, offers, promotions, contests to you, in accordance to the privacy policy of your financial institution;
- determine the category of eligible purchases and grant rewards in accordance with the Rewards Program terms and conditions applicable, if any;

In any case, Collabria will only collect information that is necessary to achieve these purposes.

## 2. From whom do we collect information?

In most circumstances, we collect information directly from you. In other words, consent may be obtained directly from you orally, in writing or electronically, and your consent may be implied or express depending on the nature and sensitivity of the information. However, for all activities related to the determination and the maintaining of your credit-worthiness, Collabria will also, with your consent, collect information directly from credit reporting agencies, financial institutions, employers, credit card issuers, third party service providers, program partners, organizations or government bodies (collectively the "**Third Parties**").

## 3. Can I withdraw my consent?

Under certain circumstances and in accordance with applicable data protection legislation, you may withdraw your consent to the collection, use and disclosure of your personal information. However, such refusal or withdrawal of your consent may limit or prevent us from providing you with, or being able to continue to provide you with, specific products or services.

Also, you may withdraw your consent to receive any marketing or promotional messages from Collabria and its affiliates, and/or your financial institution and its affiliates and partners, by contacting us.

Should you wish to withdraw your consent to receive any marketing or promotional messages from your financial institution, as well as its affiliates, partners, and assignees, please contact said financial institution directly.

#### 4. What Information do we collect?

- your complete name, address, birthdate, telephone number(s), email address, gender, professional occupation, income, education, assets, debts, social insurance number (optional information), marital status; monthly housing payment; residence status; length of time at the residence; immigration or citizenship status; mother's maiden name; identification document (including Canadian Citizenship card or certificate of Indian status or driver's licence or provincial/territorial ID card or passport or permanent residence card); length of employment (collectively the "**Socio-demographic information**");
- your Account information and transaction information including but not limited to: Account number, type of transaction, purchase volume, outstanding balance, some purchases with the name of the merchants and the amount, whether or not your card has been approved, declined or cancelled; (collectively the "**Account information**");
- information from Third Parties to assess and update your credit worthiness, including: credit score, credit reporting agencies reports, information on your income, professional occupation, your assets, your debts (collectively the "**Credit worthiness information**");
- your telephone conversations, emails and short messages system (SMS), or any other communications with our employees or representatives when you make requests for help or services or when we contact you for quality purposes or to manage your customer file. We may also collect these exchanges with you as proof of your consent, as required.

#### 5. With whom do we share personal information?

We disclose personal information to and receive personal information from Third Parties required for the purpose of providing you with our services. If you want to learn more about each Third Parties' privacy practices, please click on each third party to be redirected to their privacy policy. Please find a partial list of the main above-mentioned Third Parties:

- [Visa Inc.](#) and [Mastercard International Incorporated](#) (Account information);
- [Equifax Inc.](#) and or [TransUnion of Canada Inc.](#) (Socio-demographic information, Account information and Credit worthiness information);
- Your financial institution who referred you to us to get a Collabria credit card, as well as its affiliates, partners and assignees (Socio-demographic information, Account information and Credit worthiness information);
- [Canada Post](#) (Socio-demographic information);
- [Spinutech Inc.](#) (Socio-demographic information and Credit worthiness information);
- [CU Direct Corporation](#) (Socio-demographic information and Credit worthiness information);
- [CU Cooperative Systems Inc.](#) (Socio-demographic information, Account information and Credit worthiness information);
- [Thales](#) (Socio-demographic information and Account information);
- [Fiserv](#) (Socio-demographic information, Account information and Credit worthiness information);
- If applicable, [CUMIS](#) (Socio-demographic information, Account information and Credit worthiness information);
- [Fédération des Caisses Desjardins du Québec](#) (Socio-demographic information, Account information and Credit worthiness information);
- If applicable, with collection agencies including [Solutions UpLevel](#) (Socio-demographic information, Account information and Credit worthiness information), [General Credit Services Inc.](#) (Socio-demographic information and Account information) [ARO Inc.](#), (Socio-demographic information and Account information);
- RR Donnelley & Sons Company ([RRD](#)) (Socio-demographic information, Account information and Credit worthiness information);
- [Celero Solutions Inc.](#) (Socio-demographic information, Account information and Credit worthiness information);
- [CBN Commercial Solutions](#) (Socio-demographic information and Account information);

- [Doxim Inc.](#) (Socio-demographic information, Account information and Credit worthiness information);
- [RAZR Marketing Inc.](#) (Socio-demographic information and Account information);
- [Millennium Process Group Inc.](#) (Socio-demographic information, Account information and Credit worthiness information);
- [Service Quality Measurement Group, Inc. \("SQM"\)](#) (Socio-demographic information)

We share personal information with Third Parties located outside of Canada. In such a case, your personal information may be subject to the laws of the jurisdiction(s) in which the information is held. For example, information may be disclosed in response to valid demands or requests from government authorities, courts or law enforcement agencies in these jurisdictions. We ensure that they provide effective protection for your personal information and that they will not use or share your information for purposes other than those for which we have shared your information.

## **6. What can your financial institution do with your personal information?**

The financial institution who referred you to us to get a Collabria credit card, as well as its affiliates, partners and assignees may use your personal information to:

- Assist us in the execution of the activities set out in section 1 above; and
- Any other purpose that you have consented to directly with your financial institution. Please consult your financial institution's privacy policy for more details.

## **7. Where do we keep personal information?**

Personal information is stored and processed in any country where we have facilities or in which we engage Third Party, including Canada and United States.

## **8. How do we protect personal information?**

We follow generally accepted industry standards to protect the information submitted to us. We maintain appropriate physical, technical and administrative safeguards to protect personal information against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing of the personal information in our possession.

However, no method of transmission over the Internet, or method of electronic storage, is 100% secure. Even though we take all reasonable measures to protect your information, we cannot ensure or warrant that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or administrative safeguards.

## **9. How long do we retain personal information?**

Collabria retains personal information for as long as necessary to fulfill the identified purposes or as long as required by applicable laws.

## **10. What rights do you have in relation to your personal information?**

Under certain circumstances and in accordance with applicable data protection legislation, you are entitled to ask if we are processing information and, if we are, request access to personal information. There may be a reasonable fee if you require a copy. You are also entitled to request that any incomplete or inaccurate personal information we hold be corrected. If you discover inaccuracies in our records, or your personal information changes, please notify us in writing.

Requests to access your personal information must be made to us in writing. We will respond to your request within the applicable legal established time limits or give you written notice if we need more time to respond. To exercise any of these applicable rights, please contact us at the addresses indicated in the "How to contact us?" section.

## **11. How can you contact us?**

For any questions or comments about this policy or personal information, to make an access or correction request, to make a complaint or to obtain information about our policies and practices with respect to any service providers outside Canada, please contact: [privacy@collabriafinancial.com](mailto:privacy@collabriafinancial.com), or Collabria, Suite 450, 110-9th Ave SW Calgary, Alberta T2P 0T1