

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.

1. 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 license 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@collabriefinancial.com, or Collabria, Suite 450, 110-9th Ave SW Calgary, Alberta T2P 0T1

ABOUT CARDWISE MOBILE APP

I. What is CardWise Mobile App?

CardWise (the "App") helps you control your credit cards through your mobile device, making it easy to manage your finances on the go. The App allows you to:

- i. get real-time balances for your accounts
- ii. view your transactions and statements
- iii. receive alerts
- iv. manage cards

This Privacy Policy, in combination with other relevant privacy notices that we provide to you (e.g., pursuant to financial privacy laws), inform you of the policies and practices regarding the collection, use and disclosure of any personal information that we and our service providers collect from or about users in connection with the App's website and mobile application (the "Services").

2. What types of information do we collect in the app?

Through your use of the Services, we may collect personal information from you in the following ways:

- a) Personal Information You Provide to Us.
 - i. We may collect personal information from you, such as your first and last name, address, e-mail, telephone number, when you create an account.
 - ii. We will collect the financial and transaction information necessary to provide you with the Services, including account numbers, payment card expiration date, payment card identification, verification numbers, and transaction and payment history.
 - iii. If you provide feedback or contact us via email, we will collect your name and email address, as well as any other content included in the email, in order to send you a reply.
 - iv. We also collect other types of personal information that you provide voluntarily, such as any information requested by us if you contact us via email regarding support for the Services.
- b) Personal Information Collected from Third Parties. We may collect certain information from identity verification services and consumer reporting agencies, including credit bureaus, in order to provide some of our Services.
- c) Personal Information Collected Via Technology. We and our service providers may automatically log information about you, your computer or mobile device, and your interaction over time with our Services, our communications and other online services, such as:
 - i. Device data, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, RAM and disk size, **CPU** usage, device type (e.g., phone, tablet), IP address, unique identifiers, language settings, mobile device carrier radio/network information (e.g., WiFi, LTE, 3G), and general location information such as city, state or geographic area.
 - ii. Online activity data, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Service, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.
 - iii. Cookies, which are text files that websites store on a visitor's device to uniquely identify the visitor's browser or to store information or settings in the browser for the purpose of helping you navigate between pages efficiently, remembering your preferences, enabling functionality, and helping us understand user activity and patterns.
 - iv. Local storage technologies, like **HTML5** and Flash, that provide cookie-equivalent functionality but can store larger amounts of data, including on your device outside of your browser in connection with specific applications.
 - v. Web beacons, also known as pixel tags or clear GIFs, which are used to demonstrate that a webpage or email was accessed or opened, or that certain content was viewed or clicked.
 - vi. Location Information. If you have enabled location services on your phone and agree to the collection of your location

when prompted by the Services, we will collect location data when you use the Services even when the app is closed or not in use; for example, to provide our fraud detection services. If you do not want us to collect this information, you may decline the collection of your location when prompted or adjust the location services settings on your device.

3. How do we use your information collected in the app?

Through your use of the Services, we may collect personal information from you in the following ways:

- a) **General Use.** In general, we use your personal information collected through your use of the Services to respond to your requests as submitted through the Services, to provide you the Services you request, and to help serve you better. We use your personal information, in connection with the App, in the following ways:
 - i. identify you as a legitimate user in our system;
 - ii. provide improved administration of the Services;
 - iii. provide the Services you request;
 - iv. improve the quality of experience when you interact with the Services;
 - v. send you administrative e-mail notifications, such as security or support and maintenance advisories; and
 - vi. send surveys, offers, and other promotional materials related to the Services.
- b) facilitate the creation of, and secure and maintain your account;
 - i. identify you as a legitimate user in our system;
 - ii. provide improved administration of the Services;
 - iii. provide the Services you request;
 - iv. improve the quality of experience when you interact with the Services;
 - v. send you administrative e-mail notifications, such as security or support and maintenance advisories; and
 - vi. send surveys, offers, and other promotional materials related to the Services.
- c) **Compliance and protection.** We may use your personal information to: We use your personal information, in connection with the App, in the following ways:
 - i. comply with applicable laws, lawful requests and legal process, such as to respond to subpoenas or requests from government authorities;
 - ii. protect our, your or others' rights, privacy, safety or property (including by making and defending legal claims);
 - iii. audit our internal processes for compliance with legal and contractual requirements and internal policies;
 - iv. enforce the terms and conditions that govern the Service; and
 - v. prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.
- d) **Creation of Non-Identifiable Data.** The App may create de-identified information records from personal information by excluding certain information (such as your name) that makes the information personally identifiable to you. We may use this information in a form that does not personally identify you to analyze request patterns and usage patterns to enhance our products and services. We reserve the right to use and disclose non-identifiable information to third parties in our discretion.

4. How are your personal information disclosed?

We disclose your personal information collected through your use of the Services as described below.

- a) In Accordance with Our Other Privacy Notices. Other than as described in this Privacy Policy in connection with the App, this Privacy Policy does not apply to the processing of your information by us or third parties with whom we share information.
- b) **Third Party Service Providers.** We may share your personal information with third party or affiliated service providers that perform services for or on behalf of us in providing the App, for the purposes described in this Privacy Policy, including: to provide you with the Services; to conduct quality assurance testing; to facilitate the creation of accounts; to optimize the performance of the Services; to provide technical support; and/or to provide other services to the App.
- c) **Authorities and Others.** Regardless of any choices you make regarding your personal information, The App may disclose your personal information to law enforcement, government authorities, and private parties, for the compliance and protection services described above.

5. What are the links to other sites?

The App may contain links to third party websites. When you click on a link to any other website or location, you will leave the App and go to another site and another entity may collect personal and/or anonymous information from you. The App's provision of a link to any other website or location is for your convenience and does not signify our endorsement of such other

website or location or its contents. We have no control over, do not review, and cannot be responsible for, these outside websites or their content. Please be aware that the terms of this Privacy Policy do not apply to these outside websites. We encourage you to read the privacy policy of every website you visit.

6. What are your choices regarding your information?

You have several choices regarding use of information on the Services.

- a) **How We Respond to Do Not Track Signals.** Some web browsers transmit "do not track" signals to the websites and other online services with which your web browser communicates. There is currently no standard that governs what, if anything, websites should do when they receive these signals. We currently do not take action in response to these signals. If and when a standard is established, we may revise its policy on responding to these signals.
- b) **Access, Update, or Correct Your Information.** You can access, update or correct your information by changing preferences in your account. For additional requests, please contact us.
- c) **Opting Out of Email or SMS Communications.** If you have signed-up to receive our email marketing communications, you can unsubscribe any time by clicking the "unsubscribe" link included at the bottom of the email or other electronic communication. Alternatively, you can opt out of receiving marketing communications by contacting us at the contact information under "Contact Us" below. If you provide your phone number through the Services, we may send you notifications by **SMS**, such as provide a fraud alert. You may opt out of **SMS** communications by unlinking your mobile phone number through the Services.
- d) **Opting Out of Location Tracking.** If you initially consented to the collection of geo-location information through the Services, you can subsequently stop the collection of this information at any time by changing the preferences on your mobile device. Please note, however, that if you withdraw consent to our collection of location information, you may no longer be able to use some features of the App.

7. Safeguards and Retention

We implement reasonable administrative, technical and physical measures in an effort to safeguard the information in our custody and control against theft, loss and unauthorized access, use, modification and disclosure. Nevertheless, transmission via the internet is not completely secure and we cannot guarantee the security of your information.

8. A note about children

The Services are not directed towards individuals under the age of 18, and we do not, through the App, intentionally gather personal information about visitors who are under the age of 18. If a child under 18 submits personal information to us through the App and we learn that the personal information is the information of a child under 18, we will attempt to delete the information as soon as possible.

9. How can you contact us?

For any questions or comments about the CardWise privacy policy, please contact: info@collabriafinancial.com, or Collabria, Suite 450, 110-9th Ave SW Calgary, Alberta T2P 0T 1

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