

Internet Privacy Policy for Collabria

1. Accountability

At Collabria, we ensure your confidentiality by protecting the personal, business and financial information entrusted to us. Committing to protect your confidential information is fundamental to the way we do business and is reflected in our privacy policies and procedures. Each and every one of our employees is responsible for respecting and protecting the personal information to which the employee or its agent has access.

A copy of the Collabria Privacy policy is available by calling 1-855-341-4643 or visiting collabriafinancial.ca where a copy of the privacy policy is available for view or print.

This policy is developed in compliance with the privacy and personal information protection statute that is applicable in your province. These statutes set out rules for how organizations such as ours can collect, use and disclose your “personal information”. For the purposes of this privacy policy, “personal information” means information about an identifiable individual, as further defined under applicable laws provincial and federal privacy statutes.

2. Why We Ask For Your Information

In order to provide service to you, we will collect information from you, including personal information.

We request information from you, including personal information, to complete your credit card application request and to establish and serve you as our customer. When you apply for a new product or service we will indicate in the application or agreement how we intend to use your information. When you request products or services, we will ask you to provide only the information that enables us to complete your request, to establish you as a customer, to provide better service, or to offer you products and services we believe you might be interested in.

3. What Information We Collect

The information we ask for depends on which product or service you want. For every product or service we need your name, address, birthdate, occupation, pertinent financial information and identification. Much of the information comes from you but we may also collect information from third parties such as credit bureaus, public records, or government agencies and registries in order to assess your credit worthiness. We may monitor or record our conversations with you (e.g., telephone calls). Health information may be required to determine eligibility for, or benefits under, health related products or services such as insurance. Due to its sensitive nature, health information will not be used or shared for marketing or loan assessment purposes.

4. How We Use the Information

We collect, use and share personal information about you throughout our relationship in order to provide you with the services and products you have requested for yourself. For example, we collect, use and disclose your personal information in order to:

- a. establish your identity and determine your eligibility and credit-worthiness for products or services
- b. provide you with products or services
- c. communicate with you by various methods including email, text (SMS), telephone, fax, or other telecommunication channels
- d. aggregate and analyze information to understand who you are, your financial needs, and what products, services, and promotions may be of interest to you
- e. use third party service providers to perform services on our behalf
- f. meet tax or legal and regulatory obligations
- g. 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

If we wish to use or disclose your personal information for a new business purpose, we will ask for your consent. We may not seek consent if the law allows this.

We will only collect, use and disclose personal information that is necessary to fulfill the purposes described in this section and in section 3, unless we have received further consent from you. We will only collect, use or disclose personal information in accordance with any applicable provincial or Federal privacy laws.

We do not sell any information collected to third parties for solicitation or marketing purposes.

5. Sharing Your Information

There are times when we may disclose your personal information to other persons, organizations or government bodies. For example:

Disclosure to credit agencies to establish credit-worthiness

Where you might be a victim of fraud, financial abuse, or other illegal activity we may share personal information with the appropriate legal or governmental authorities or any other appropriate person. In these circumstances, we will share information we believe is reasonably necessary to protect your interests.

We may share your personal information to protect our rights or interests (e.g., to collect on a debt).

We may share your personal information where authorized by PIPEDA or required by provincial law.

Depending on your products or services with us, we may share information with our program partners, such as your financial institution.

Your information may be shared, stored or accessed in Canada or The United States for the purpose of determining credit-worthiness; performing collection activity; card management and distribution; authorization processing, statement processing; fraud detection and prevention; cardholder insurance benefits and rewards processing; and providing cardholder services in relation to the services that the customer has asked for. Your information may be disclosed in response to valid demands or requests from governments, regulators, courts and law enforcement authorities in those jurisdictions or countries.

Any service provider where personal information is provided to, shared with or who stores or processes personal information on behalf of Collabria is bound by contract to adhere to Collabria's privacy policy and the requirements of PIPEDA or requirements by applicable provincial law.

6. Protecting Your Information

We take appropriate steps to protect your personal information from unauthorized use, loss, or theft and we audit our security procedures and assess that they remain effective and appropriate. We employ a diverse range of technologies and security mechanisms to ensure the safety, confidentiality and integrity of your information and transactions.

Authorized employees who have access to your information are required to undergo training on the importance of keeping personal information confidential.

We have agreements and controls in place with credit bureaus, credit insurers, other lenders and third party service providers requiring that any information we provide to them must be safeguarded and used only for the purpose of providing the service we have contracted the company to perform. These agreements require third parties to adhere to Collabria's privacy policy and any applicable Federal (PIPEDA) or provincial privacy law.

The destruction of personal information is performed using reasonably secure methods.

7. How Long We Retain Personal Information

Collabria will keep personal information used to make a decision that directly affects individuals for at least one year after a decision is made. Subject to the one year retention, Collabria will only retain personal information for as long as necessary to fulfill the identified purposes or as long as required for legal or business purposes. Where required by Federal or Provincial law, Collabria may retain personal information for up to seven years.

8. Accessing Your Personal Information

You have the right to access your personal information under our custody or control.

Requests to access your personal information, or to find out how it has been or is being used by us, or to whom we have disclosed it, must be made to us in writing. We may require individuals to provide their identification before giving them access to their personal information. We will advise you in advance if a minimal charge will be required for conducting the search and we will respond to your request within 30 business days or give you written notice if we need more time to respond. We may require payment of a deposit or the whole fee before releasing the requested information.

Please note there may be instances where access to the information we hold may be restricted as permitted or required by law. Examples may include:

- where we are authorized or required by PIPEDA or any other provincial personal privacy law to refuse access
- information subject to legal privilege

- information containing confidential commercial information
- information relating to a third party

If applicable, we will inform you of the reasons for restricting or refusing access subject to any legal or regulatory limitations.

9. Accuracy

We will make every reasonable effort to keep your personal information accurate and complete. As we do business with you, we will update your information as may be necessary. You can assist with this by informing us when you make changes to your personal information, such as name or address change. If you discover inaccuracies in our records, or your personal information changes, please notify us in writing. If we are satisfied that your request for correction is reasonable, we will correct the personal information as soon as reasonably possible. We will also send the corrected personal information to each organization to which the personal information was disclosed by us during the year before the date the correction was made. If we do not correct your personal information, we will note the requested correction on copies of the personal information under our custody or control.

10. Obtaining Your Consent

When you apply for a new product or service, we obtain your consent to collect, use or disclose your personal information for the purpose of delivering the product or service. Consent may be obtained from you orally, in writing or electronically, and your consent may be implied or express depending on the nature and sensitivity of the information. Subject to certain restrictions, you can withdraw your consent to our collection, use or sharing of your information at any time upon giving us reasonable notice. However, withdrawing your consent may limit or prevent us from providing you with, or being able to continue to provide you with, specific products or services.

If you prefer, you may choose not to have us –

- **Conduct a credit check in order to assess your creditworthiness and/or to perform a risk analysis**
In doing so, however, we may not be able to extend services to you. Once you have a credit product with us, we will share your credit experience on an ongoing basis with other lenders and credit reporting agencies. You cannot withdraw your consent for this sharing of information as it is necessary to support the credit process.
- **Contact you by telephone, fax, text messaging, automatic dialing-announcing device or other electronic means, at the numbers you have provided us, or by internet, mail, email and other methods for marketing purposes.**

This does not include messages or other information about promotional offers we provide on, or enclose with, your written or electronic account statements, or that we may discuss while talking with you. Any marketing campaigns that are already underway may not immediately take your preferences into account.

If you prefer to not receive our direct marketing communications and/or not have your personal information shared among our program partners for the purpose of marketing, you can have your name deleted from our direct marketing and/or shared information lists. If you want to change your privacy preferences, please contact us in writing.

In certain circumstances your consent cannot be withdrawn. For example, you may not withdraw your consent where our collection, use or sharing is permitted or required by law. Also, in order to maintain the integrity of the credit reporting system, we may periodically update your information with credit bureaus as long as you have a credit product or service with us and for a reasonable period of time afterwards. Your consent to the exchange of information cannot be withdrawn during this time.

11. Use of Service Providers Outside Canada

For the purposes of providing you with products and services, we may use service providers in the United States. These service providers may collect personal information about you on our behalf. We may also transfer to these service providers personal information about you that was collected by us. In particular, these service providers may be engaged by Collabria for the purposes of determining credit-worthiness; performing collection activity; card management and distribution; authorization processing, statement processing; fraud detection and prevention; cardholder insurance benefits and rewards processing; and providing cardholder services in relation to the services that the customer has asked for. Your information may be disclosed in response to valid demands or requests from governments, regulators, courts and law enforcement authorities in those jurisdictions or countries.

You can obtain access to written information about our policies and practices with respect to service providers outside Canada by calling Cardholder Service at 1-855-341-4643

You may also contact Collabria directly by writing to the address listed below:

12. Contacting Us About Your Personal Information

If you have any questions, comments or complaints regarding our treatment of your personal information, or if you wish to access your personal information or have it corrected, then please contact our privacy officer at:

Collabria Financial Services Inc.
PO Box 82029 RPO Connaught
Calgary, Alberta T2R 0X1
1-855-341-4643
Attention: John Dundas

If you are not satisfied with our response you may complain to the Office of the Information or Privacy Commissioner having jurisdiction in your province of residence.