

Privacy Policy

This document was last updated April 1st, 2021.

Fintech Select Ltd. provides a broad range of financial products and call center services to customers in Canada and the United States.

Fintech Select Ltd. is committed to maintaining the privacy, confidentiality, security, and accuracy of customer and employee personal information.

Principals

There are 10 fair information principles that form this policy:

1. Accountability
2. Identifying purposes
3. Consent
4. Limiting collection
5. Limiting use, disclosure, and retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual access
10. Challenging compliance

Purpose

This Privacy Policy is a formal statement of principles and guidelines concerning the minimum requirements for the protection of personal information provided by the customers and employees. The objective of the policy is to maintain responsibility and transparency regarding the management of personal information, in accordance with federal privacy legislation as set out in the Personal Information Protection and Electronic Documents Act, S.C. 2000, c.5, (PIPEDA).

Scope

The Privacy Policy applies to all personal information collected about customers and employees. The Privacy Policy applies to the management of personal information in any form, whether verbal, electronic, or written.

Definitions for the purposes of this Privacy Policy:

Collection - the act of gathering, acquiring, recording or otherwise obtaining any personal information from any source and by any means.

Consent – voluntarily agreeing to the collection of personal information for a defined purpose. Consent can be either express or implied, and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically, or in writing, but is always unequivocal and does not require any inference on the part of Fintech Select Ltd. Implied consent is consent that can be reasonably inferred from an individual's actions or inactions.

Customer - an individual who uses Fintech Select Ltd.'s services or otherwise provides personal information.

Disclosure – the act of making personal information available to a third party.

Employee - an employee of Fintech Select Ltd. Company.

PIPEDA The Personal Information Protection and Electronic Documents Act (PIPEDA) – the federal privacy law for private-sector organizations. It establishes ground rules for how businesses must handle personal information in the course of their commercial activity.

Personal information – Under PIPEDA, personal information includes any factual or subjective information—recorded or not—about an identifiable individual. This includes information in any form.

For an employee, such information includes information found in personal employment files, performance appraisals, and medical/benefit information.

Data Collection

Information collected by Fintech Select Ltd. could include: name, address, date of birth, phone number, identifying account numbers, email address, government issued identification, and transaction information for the purposes of identification and account management.

Privacy Principles

1. Accountability

Fintech Select Ltd. is responsible for all personal information under their control and has established procedures to receive and respond to complaints and inquiries.

1.1 Fintech Select Ltd. has implemented policies and procedures to give effect to the Privacy Policy, including:

- a) Implementing procedures to protect personal information and to oversee compliance with the Privacy Policy;
- b) Establishing procedures to receive and respond to inquiries or complaints;
- c) Training and communicating with staff about policies and practices.

2. Identifying Purposes for Collection of Personal Information

Fintech Select Ltd. shall identify the purposes for which personal information is collected at or before the time the information is collected.

2.1 Fintech Select Ltd. shall collect personal information for the following purposes:

- a) To establish and maintain responsible relations with customers and to provide ongoing service;
- b) To understand customer needs;
- c) To develop, enhance, or provide products and services;
- d) To manage and develop their business and operations, including personnel and employment matters and;
- e) To meet legal and regulatory requirements.

2.2 Unless required by law, Fintech Select Ltd. shall not use or disclose, for any new purpose, personal information that has been collected without first identifying and documenting the new purpose and obtaining the consent of the customer or employee.

3. Obtaining Consent for Collection, Use, or Disclosure of Personal Information

The knowledge and consent of a customer or employee is required for the collection, use, or disclosure of personal information.

4. Limiting Collection of Personal Information

Fintech Select Ltd. shall limit the collection of personal information to that which is necessary for the identified purposes. The information will be collected by fair and lawful means.

5. Limiting Use, Disclosure and Retention of Personal Information

Fintech Select Ltd. shall not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Fintech Select Ltd. shall retain personal information only as long as necessary for the fulfillment of said purposes.

5.1 Fintech Select Ltd. may disclose personal information about their employees:

- a) For normal personnel and benefits administration;
- b) In the context of providing references regarding current or former employees in response to requests from prospective employers, to the extent that such references are granted at all;
- c) Where disclosure is required by law.

5.2 Only those employed by Fintech Select Ltd. who require access for business reasons, or whose duties reasonably so require, are granted access to personal information about customers and employees.

5.3 Fintech Select Ltd. shall keep personal information only as long as it remains necessary or relevant for the identified purposes or as required by law. Depending on the circumstances, where personal information has been used to make a decision about a customer or employee, Fintech Select Ltd. shall either retain the actual information or the rationale for making the decision for a period of time that is reasonably sufficient to allow for access by the customer or employee.

5.4 Fintech Select Ltd. shall maintain reasonable and systematic controls, schedules, and practices for the retention and destruction of information and records that apply to personal information that is no longer necessary or relevant for the identified purposes or required by law to be retained. Such information shall be destroyed, erased, or made anonymous.

6. Accuracy of Personal Information

Personal information used by Fintech Select Ltd. shall be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a customer or employee.

6.1 Fintech Select Ltd. shall update personal information about customers and employees as and when necessary to fulfill the identified purposes or upon notification by the individual.

7. Security Safeguards

Fintech Select Ltd. shall protect personal information regardless of the format in which it is held against such risks as loss or theft, unauthorized access, disclosure, copying, use, modification, or destruction through appropriate security measures.

7.1 Fintech Select Ltd. shall protect personal information disclosed to third parties by contractual agreements stipulating the confidentiality of the information and the purposes for which it is to be used.

7.2 All employees of Fintech Select Ltd. with access to personal information shall be required as a condition of employment to respect the confidentiality of personal information.

8. Openness Concerning Policies and Practices

Fintech Select Ltd. shall make specific information about their policies and practices relating to the management of personal information readily available to customers and employees. This is intended to help customers and employees exercise choices regarding the use of their personal information and the privacy-enhancing services available.

9. Customer and Employee Access to Personal Information

Fintech Select Ltd. shall inform a customer or employee of the existence, use, and disclosure of his or her personal information upon request, and shall give the individual access to that information.

9.1 Upon request, Fintech Select Ltd. shall afford to a customer or an employee a reasonable opportunity to review the personal information in the individual's file. Personal information shall be provided in understandable form within a reasonable time and at minimal or no cost to the individual.

9.2 In certain situations, Fintech Select Ltd. may not be able to provide access to all of the personal information that they hold about a customer or employee. For example, they may not provide access to information if doing so would likely reveal personal information about a third party or could be reasonably expected to threaten the security of another individual.

9.3 Upon request, Fintech Select Ltd. shall provide an account of the use and disclosure of personal information and, where reasonably possible, shall state the source of the information.

9.4 In order to safeguard personal information, a customer or employee may be required to provide sufficient identification information to permit Fintech Select Ltd. to account for the existence, use, and disclosure of personal information and to authorize access to the individual's file. Any such information shall be used only for this purpose.

9.5 Fintech Select Ltd. shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file.

9.6 A customer or employee can obtain information or seek access to his or her individual file by contacting a designated person, Bonnie Brown, at (519)351-8647 ext 603, or by sending an email containing such a request in English or French to corporate@fintechselect.com.

10. Challenging Compliance

A customer or employee shall be able to address a challenge concerning compliance with the above principles to the designated person or persons accountable for Fintech Select Ltd.'s compliance with the Privacy Policy.

10.1 Fintech Select Ltd. shall maintain procedures for addressing and responding to all inquiries or complaints from their customers and employees about the handling of personal information.

10.2 Fintech Select Ltd. shall inform their customers and employees about the existence of these procedures, as well as the availability of complaint procedures as needed.

10.3 The person or persons accountable for compliance with the Privacy Policy may seek external advice where appropriate before providing a final response to individual complaints.

10.4 Fintech Select Ltd. shall investigate all complaints concerning compliance with the Privacy Policy. If a complaint is found to be justified, Fintech Select Ltd. shall take appropriate measures to resolve the complaint including—if necessary—amending its policies and procedures. A customer or employee shall be informed of the outcome of the investigation regarding his or her complaint.

Additional Information

For inquiries, complaints or more information please contact:

Fintech Select Ltd.

C/O Bonnie Brown

100 King Street West Unit T201A

Chatham Ontario

N7M 6A9

For more information on the Personal Information Protection and Electronic Documents Act, please see the Privacy Commissioner of Canada website at <http://www.priv.gc.ca/>.

