

This Privacy Policy sets out the manner in which information about you (“Personal Information”) is collected, used, disclosed and otherwise managed in connection with the www.finamark.ca website (the “Website”), your loan application and the administration of your loan, the personal finance service offering and through other interactions with consumers.

When you apply for a loan, you will enter into a Loan Broker Agreement with FinaMark Group Inc. (the “Broker”). If your application is approved, you will enter into a Loan Agreement with, and receive funds from FinaMark’s Partnered lender(s) (the “Lender”). If you sign up for the personal finance service offering, you will enter into an agreement with Broker. Broker and/or Lender (as applicable) collect, use and disclose your Personal Information as set out herein. The Broker and Lender carry out distinct activities, but for the purpose of this Privacy Policy they are referred to collectively as “FinaMark Group.”

Collection and Use of Personal Information

Loan Application: When you apply for a loan, Broker collects information about you including your name, contact information (such as mailing address and email address), date of birth, purpose of the loan, income, information about your rent or mortgage payments, credit related information and your social insurance number (if you choose to provide it). This information is used by Broker and/or Lender to assess your application and determine your eligibility for a loan. At the time you apply for a loan, you will be asked to provide your consent to a credit check (see section on Credit Reports below).

Loan Agreement: If you are approved for a loan, additional information will be collected including your proof of income (such as pay stubs or Notices of Assessment from your tax return), your Canadian bank account number, and information regarding your employment such as occupation, current or former employer(s). We may also collect personal and employment references with your consent.

Your information is used for the following purposes:

- approving, opening, administering, servicing and enforcing your Loan, including collecting outstanding debts;
- determining your eligibility and suitability for, and providing you with, other products and services you request;
- verifying your identity and other information you have provided to us (including your identity and bank account);

- meeting legal and regulatory requirements;
- detecting and preventing fraud and other unauthorized or illegal activities;
- as otherwise permitted or required by applicable law.

Credit Reports (Loan Application): At the time you apply for a loan, we will obtain your consent to collected credit-related information from consumer reporting agencies in order to help us determine your eligibility for a loan. Broker and/or Lender also exchange Personal Information with credit bureaus as necessary at the time of your application and throughout the term of your Loan Agreement in order to review and verify your ongoing creditworthiness, and manage and assess our risks. You authorize credit bureaus to provide such information to us.

Personal Finance Service: If you register for an account on FinaMark Group's personal finance service, Broker collects personal information (first and last name, date of birth, mailing address and telephone number) in order to obtain and provide you with your credit score for free from Equifax. Broker also collects additional personal information from you, including your email address, financial goals, annual income range, and referral source. Broker uses your credit score and other information you provide in order to better understand your financial needs and credit history, and provide you with tailored personal finance information, which may include information on steps to improve your credit score, as well as offers for FinaMark Group and third party financial services products and services that may be of interest to you based on your credit and other information. Broker will obtain and provide your credit score for free to you at the time of account creation and on a regular basis thereafter in order to provide you with up-to-date information and offers. Broker will not share your credit or other personal information with third parties for marketing purposes without your consent.

Online Registration: At the time you apply for a loan or sign-up for the personal finance service, Broker will collect your email address and a password you choose in order to create and administer an online account for you to access information about your application and/or loan and/or, in the event of the personal finance service, to access tailored information and offers. We strongly recommend that you do not disclose your password to anyone. We will never ask you for your password in any unsolicited communication (such as letters, phone calls or email messages).

Social Insurance Number: When you apply for a loan or sign-up for the personal finance service, we may ask for your social insurance number on an optional basis. You are not required to provide your social insurance number in order to apply for a loan or enter into a loan agreement, or to sign-up for the personal finance service.

However, if you choose to provide it, we use it to assist us in identifying you with credit reporting agencies and for internal fraud prevention purposes.

Marketing Communications: Broker and/or Lender may obtain your consent to use your information to send you communications by mail, email or telephone marketing or promoting products and services that may be of interest to you. You can opt-out of receiving marketing offers at any time by clicking on the unsubscribe link included in our marketing email communications or by contacting us as set out under Contact Us below. If you have signed up for our personal finance service, Broker may provide you with tailored offers on the Website and by email, text message or other electronic means about FinaMark Group and third party products and services that may be of interest to you based on your credit score and other personal information. Please note that you may continue to receive certain transactional or information electronic communications from us.

Call Recording: Broker and/or Lender may monitor and record our telephone conversations with you for training and quality assurance purposes. You will be provided with a notice at the beginning of any call that is being recorded. If you do not wish to have your call recorded, please let us know.

Customer Service: When you contact Broker and/or Lender with a comment, question or complaint, you may be asked for information that identifies you (such as your name, address and a phone number) along with additional information we need to help us promptly answer your question or respond to your comment or complaint. We may retain this information to assist you in the future and to improve our customer service and product and service offerings. We also use Personal Information to establish and manage our relationship with you and provide quality customer service.

Employment: In connection with a job application or related inquiry, you may provide Broker and/or Lender with certain Personal Information about yourself (such as that contained in a resume, cover letter, or similar employment-related materials). This information will be used for the purpose of processing and responding to your application for current and future career opportunities.

Survey and Customer Research: From time to time, Broker and/or Lender may offer you the opportunity to participate in one of our surveys or other customer research. The information obtained through our surveys and customer research is used in an aggregated, non-personally identifiable form to help us understand our customers and to enhance our product and service offerings.

Contests and Promotions: When you enter a contest or participate in a promotion, Broker and/or Lender may collect your name, address, phone number, email address, and other information you provide. This information is used to administer your participation in the contest, sweepstakes or promotion.

How Personal Information is Collected

Broker and/or Lender collect Personal Information directly from you (such as information you provide to us in connection with your loan application) as well as from third parties such as credit bureaus, current or former employers, and personal references you have provided to us.

Disclosure of Personal Information

We will not disclose, trade, rent, sell or otherwise transfer your Personal Information, without your consent, except as otherwise set out herein.

Service Providers: Your Personal Information may be transferred (or otherwise made available) to our affiliates and other third parties who provide services on our behalf. Lender uses service providers (including Broker and its authorized sub-contractors) to provide services such as billing, administration, and debt collection, to verify information you have provided to us (such as your identity and bank account number) and to administer pre-authorized debit agreements. Broker may use service providers to host the Website, operate certain of its features, send email, SMS text messages or other communications, or manage and analyze data and our advertising effectiveness. Your Personal Information may be maintained and processed by Broker, Lender, affiliates and other third party service providers in the US or other jurisdictions. In the event Personal Information is transferred to the US or other foreign jurisdiction, it will be subject to the laws of that jurisdiction and may be disclosed to or accessed by the courts, law enforcement and governmental authorities in accordance with those laws. Service providers are given the information they need to perform their designated functions, and are not authorized to use or disclose Personal Information for their own marketing or other purposes.

Investors: Loans are funded through capital provided by third party investors. Information about current and former customers will be shared on a non-identifiable basis with current as well as potential investors. The information provided to investors includes aggregated data derived from customer credit history data and loan performance information. The information is presented in a

manner that the identity of an individual would not be identifiable from the data. We share this information in order to allow current and potential investors to evaluate the performance of the loans. For example, the data may be used to determine default and delinquency rates in the loan portfolio, or to present aggregate information on creditworthiness.

Equifax: If you have signed up for FinaMark Group's personal finance service, Broker will obtain your consent to provide your first and last name, date of birth, mailing address and telephone number to Equifax so that they can provide you with your credit score for free at the time of account creation and on a regular basis thereafter for the purposes set out above in this Privacy Policy.

Legal/Compliance: Broker, Lender, each of their affiliates and Canadian, US and other service providers may provide your Personal Information in response to a search warrant or other legally valid inquiry or order (which may include lawful access by Canadian, US or other foreign governmental authorities, courts or law enforcement agencies), to other organizations in the case of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud or as otherwise required or permitted by applicable Canadian, US or other law. Your Personal Information may also be disclosed where necessary for the establishment, exercise or defence of legal claims and to investigate or prevent actual or suspect loss or harm to persons or property.

Sale of Business: Personal Information may be transferred as an asset in connection with a prospective or completed merger or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of Broker and/or Lender or as part of a corporate reorganization or stock sale or other change in corporate control.

Cookies, Interest-Based Advertising, and Additional Information about our Website

Visiting our Website

In general, you can visit the Website without telling us who you are or submitting any Personal Information. However, we and/or our service providers (such as Google Analytics) collect IP (Internet protocol) addresses from all visitors to the Website and other related information such as page requests, browser type, operating system and average time spent on our Website. This information is used to help us understand our Website activity, and to monitor and improve the Website.

Cookies, Tracer Tags & Web Beacons

Our Website uses a technology called “cookies”. A cookie is a tiny element of data that our Website can send to your browser, which may then be stored on your hard drive so we can recognize you when you return. We use cookies on the pages on our Website where you are prompted to log in or that are customizable. If you have registered with our Website, these cookies (1) may let us know who you are, (2) may be necessary to access your account information (stored on our computers) in order to deliver products and personalized services, and (3) will provide us and our service providers with information that we will use to personalize our Website in accordance with your preferences. We and our service providers (such as Google Analytics) also use cookies to help us understand our website activity, to improve our Website and provide better customer service. For more information about Google Analytics, see www.google.com/policies/privacy/partners/.

You may set your Web browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our Website, you may not be able to take advantage of all of the features of our Website.

Our Website may also use a technology called “tracer tags” or “Web Beacons”. This technology allows us to understand which pages you visit on our Website. These tracer tags are used to help us optimize and tailor our Website for you and other future visitors to our Website.

Interest-Based Advertising

We may use third parties (such as Remarketing with Google Analytics) to serve our advertisements on our Website and other websites. These companies may use cookies, tracer tags or web beacons to report certain information about your visits to our Website and other websites (such as web pages you visit and your response to ads) in order to measure the effectiveness of our marketing campaigns and to deliver ads that are more relevant to you, both on and off our Website.

You can opt-out of interest-based ads from Google by visiting <http://www.google.com/settings/ads>. To find out more about the collection and use of information by third parties for behavioural advertising purposes, or if you would like to opt-out of certain third-party cookies and make selections about what online advertisement you choose to receive, you can visit the [Digital Advertising Alliance of Canada website](#).

Third Party Links

Our Website may contain links to other sites that we do not own or operate, including social media websites. Also, links to our Website may be featured on third party websites on which we advertise. Except as provided herein, we will not provide any of your Personal Information to these third parties without your consent. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. The linked websites have separate and independent privacy statements, notices and terms of use, which we recommend you read carefully. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your Personal Information.

Safeguards and Retention

We have implemented reasonable administrative, technical and physical measures in an effort to safeguard the Personal Information in our custody and control against theft, loss and unauthorized access, use, modification and disclosure. We restrict access to your Personal Information on a need-to-know basis to employees and authorized service providers who require access to fulfil their job requirements.

We have Personal Information retention processes designed to retain Personal Information of our customers for no longer than necessary for the purposes stated above or to otherwise meet legal requirements (which may extend beyond the end of your relationship with us).

Access to Your Personal Information

You have the right to access, update, and correct inaccuracies in your Personal Information in our custody and control, subject to certain exceptions prescribed by law. You may request access, updating and corrections of inaccuracies in Personal Information we have in our custody or control by emailing or writing to us at the contact information set out below. You may also update certain contact information through our online portal. We may request certain Personal Information for the purposes of verifying the identity of the individual seeking access to their Personal Information records.

Changes to the Privacy Policy

This Privacy Policy may be updated periodically to reflect changes to our Personal Information practices. We will post the updated Privacy Policy on our website. Your Personal Information will be treated in accordance with the Privacy Policy in

place at the time your Personal Information was collected, unless you otherwise consent.

Contact Us

Please contact our Privacy Officer if:

- you have any questions or comments about this Privacy Policy,
- you wish to access, update, and/or correct inaccuracies in your Personal Information, or
- you otherwise have a question or complaint about the manner in which we or our service providers treat your Personal Information.

You may contact our Privacy Officer by email at info@FinaMark.ca or by mail at the following address:

FinaMark Group Inc.
126 South Albion Street Unit 101
Amherst, NS
B4H2X3