



MONEYWAY FINANCIAL GROUP PRIVACY POLICY

At MoneyWay, your privacy is of great importance to us. We are committed to the protection of the personal information of all of our clients, website visitors and other individuals whose personal information is entrusted to MoneyWay. This policy applies to MoneyWay Financial Group, hereinafter referred to as “MoneyWay”.

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Date of last update: January 19th, 2024



1. Accountability for Your Privacy

MoneyWay takes responsibility for the management and confidentiality of personal information. Personal information is collected, used, shared and stored in accordance with the B.C. Personal Information Protection Act. MoneyWay also respects the privacy best practice principles contained in the Canadian Standards Association Model Code for the Protection of Personal Information.

MoneyWay has appointed a Privacy Officer who oversees compliance with privacy laws and best practice. The Privacy Officer's duties include:

- Developing and, on a regular basis, reviewing MoneyWay policies and practices to ensure consistent implementation and compliance;
- Ensuring all staff are trained on privacy best practices and are aware of the importance of safeguarding any personal information that they are privy to;
- Ensuring that all inquiries and complaints relating to privacy are appropriately handled; and
- Ensuring all third parties to whom MoneyWay provides access to personal information adhere to appropriate standards of care in managing that information.

2. Collecting your Information

'Personal information' is any information about an identifiable individual. This includes your name, contact information, date of birth, any identifiers such as your social insurance number, and any identifiable on-line activity. It also includes financial information such as your account number, credit rating or income.

Personal information can be collected in several ways, including through our forms, documents you provide, or our transaction system. We collect limited personal information to offer and deliver our products or services and do so with your consent or as otherwise authorized by law. We identify when information may be provided optionally and when it is necessary to service you.

Your consent can be withdrawn at any time, subject to legal or contractual restrictions, by providing us with written notice. Upon receipt of notice of withdrawal of consent, we will inform you of the likely consequences of withdrawing your consent before we process your request, which may include the inability of MoneyWay to provide you with certain services.



3. Using Your Information

We collect and use personal information for the following specific purposes:

- To establish and maintain a business relationship with you;
- To verify your identity or contact you;
- To process your application for an account, determine eligibility and suitability for certain products and services, and to provide on-going service;
- To assess your needs and enhance MoneyWay products and services;
- To assess creditworthiness, for example, by obtaining a credit report on you where appropriate and with your authorization;
- To assess and manage risk, including detecting and preventing fraud or error;
- To collect debts owed to MoneyWay and enforce agreements between you and MoneyWay;
- To provide you with access to utilize EFT's, bill payment, or other online banking enabled transactions and to administer and manage your account;
- To inform you about MoneyWay products or services that may be of interest to you;
- and
- To meet legal and regulatory requirements.

In addition, when you use visit MoneyWay's website, use online banking services to send or receive funds with MoneyWay, we automatically receive and record information on our server logs from your browser or mobile platform, including the date and time of your transaction or website visit, your IP address and other unique device identifiers. We collect such information to analyze and improve the performance of our digital services.

4. Sharing Your Information

MoneyWay takes all reasonable steps to protect the interest of our clients when disclosing personal information. We do not disclose personal information for purposes other than those for which it was collected, unless you have provided consent to do so, or we are required by law to disclose the information. Keep in mind that if you have accounts that are jointly held with other persons, your personal information may, in certain circumstances, be disclosed to joint accountholders.

We may also share your personal information with participants in the payment, clearing and settlement systems, as well as MoneyWay's service providers. Such service providers include the following:

- Lawyers, appraisers, accountants and other professionals and consultants in connection with processing and administering products and services provided to you;



- IT service providers;
- Our partner financial institutions;
- Credit reporting and fraud checking agencies; and
- Marketing and market research partners, including data analytics.

We take reasonable steps to ensure that any such third parties who we entrust with your personal information are reputable and have safeguards in place to protect this information. In working with business partners and service providers, your personal information may be transferred to a foreign jurisdiction to be processed or stored. Such information may be provided to law enforcement or national security authorities of that jurisdiction upon request in order to comply with foreign laws.

5. Keeping Your Information Safe

MoneyWay has implemented critical physical, organizational and technical measures to guard against unauthorized or unlawful access to the personal information we manage and store. We have also taken steps to avoid accidental loss or destruction of, or damage to, your personal information. While no system is completely secure, the measures implemented by MoneyWay significantly reduce the likelihood of a data security breach.

Here are some examples of the security controls we have in place:

- Secure office premises;
- Secure shredding practice for paper records;
- The use of encryption and robust authentication processes, including passwords, for electronic records;
- Limited access to personal information by employees who have been appropriately cleared and who need the information to do their jobs;
- The use of data centers with effective physical and logical data security controls; and
- Staff that are keenly aware of their data protection and Privacy responsibilities.

In addition, we recommend that you do your part in protecting yourself from unauthorized access to your MoneyWay accounts. MoneyWay is not liable for any unauthorized access to your personal information that is beyond our control.

Let us know right away if your contact information changes or you find any errors in your transaction statements. If you have reason to believe that the security of your account has been compromised, you must immediately notify MoneyWay of the problem in order for us to investigate the issue in a timely manner.



6. Accessing Your Information

We make every effort to ensure that the personal information we hold is accurate, complete and up-to-date for the purposes for which we collect it. You can make a written request for access to your personal information at any time, and also request that it be corrected if there are any inaccuracies. You will need to provide as much information as you can to help us process your request, such as dates, client account number(s) and any other details that can help us locate the information you require. We may charge a fee related to responding to your access request.

Upon your request, MoneyWay will also inform you of how your personal information has been or is being used, and who your personal information has been shared with.

MoneyWay responds to access requests within 30 days unless an extension of time is required. However, there may be contexts where access is refused or only partial information is provided, for example, in the context of an on-going investigation or where another individual's personal information or identity must be protected.

7. How Long We Keep Your Information

MoneyWay retains personal information for as long as necessary to fulfill legal or business purposes and in accordance with our retention schedules. Once your information is no longer required to administer products or services and meet legal or regulatory requirements, it is securely destroyed, erased, or made anonymous.

Although we strive for limited retention of personal information, any information that is used to make a decision that affects you will be retained for at least one year, to provide you with an opportunity to access it. Also, keep in mind that residual information may remain in back-ups for a period of time after its destruction date.

8. External Links and Social Media

We may offer links from our website or other methods of communication such as email, such as affiliated organizations, that may be of interest to you. MoneyWay makes no representations as to such third parties' privacy practices and we recommend that you review their privacy policies before providing your personal information to any such third parties.

MoneyWay's use of social media serves as an extension of our presence on the Internet. Social media account(s) are public and are not hosted on MoneyWay's servers. Users who choose to interact with MoneyWay via social media, such as Facebook, should read the terms of service and privacy policies of these services/platforms.



9. Our Privacy Complaint and Breach Management Process

MoneyWay takes privacy complaints very seriously and has a procedure in place for escalating and managing any privacy related concerns to ensure that they are responded to in a timely and effective manner. Any suspected privacy breach must be escalated internally to MoneyWay's Privacy Officer who oversees the containment, investigation, and corrective actions for the breach situation.

In the event that you are not satisfied with MoneyWay's resolution of a complaint or privacy breach, you may contact the B.C. Office of the Information and Privacy Commissioner. Visit <https://www.oipc.bc.ca/about/contact-us/>

10. Changes to this Policy

We may change this Privacy Policy from time to time in order to better reflect our current personal information handling practices. Thus, we encourage you to review this document frequently. The "date last updated" date on the first page of this Privacy Policy indicates when changes to this policy were published and are thus in force. Your continued use of MoneyWay products and services following the posting of any changes to this Privacy Policy means you accept such changes.

11. Getting in Touch

Any inquires, concerns or complaints regarding privacy should be directed to:

Privacy Officer MoneyWay Financial Group

1452 Lonsdale Ave,

North Vancouver, B.C. V7M 2J1

Tel: 604-923-8000

Toll Free: 1-888-963-6923

privacy@moneyway.com

Your concerns will receive prompt attention. Thank you for choosing MoneyWay.