

Privacy Policy



In this Privacy Policy, "Tua", "we", "us", "our" and like terms refers to Tua Financial Technologies Ltd.

This Privacy Policy applies in respect of those of our activities that are subject to the provisions of Canada's federal and provincial privacy laws, as applicable.

WHAT IS PERSONAL INFORMATION?

Personal information refers to any information about an identifiable individual.

WHAT PERSONAL INFORMATION DOES TUA™ COLLECT?

Depending upon the nature of your relationship with Tua, we may collect and maintain different types of personal information, such as your:

- Contact or identification information (such as your name, address, telephone number and e-mail address);
- Financial and credit information (such as employment history, assets and liabilities, income sources, credit history, payment preferences and, where you seek credit from us, your social insurance number, occupation, education), so that we may assess your credit, and determine what is an appropriate financial product for you;
- Business relationship information (such as your feedback, information about the products and services that we buy from or sell to you, and information about your preferences, advisors and decision-makers), so that we can tailor our relationship to meet your specific needs; and
- Specific Credit Application information, as more fully described in our credit application provided to you during the credit application and review process.

WHY DO WE COLLECT, USE, AND DISCLOSE PERSONAL INFORMATION?

We collect, use and disclose personal information to enable us to manage and develop our business and operations, for example, we may collect, use or disclose your personal information to:

- Establish and maintain our relationship with you (for example, we may send you updates/newsletters or account statements);
- Determine your financial situation and eligibility for our financial products, including to manage our level of risk (for example, we may share your personal information with credit reporting agencies, credit bureaus, financial institutions or others involved in the financing or securitizing of our credit business);
- Comply with applicable law or regulatory requirements (for example, we may collect personal information to satisfy the obligations imposed on us by various regulatory agencies);
Comply with your requests (for example, if you advise us of a preferred telephone number at which to be contacted, we will use this information to contact you at that number);
- Protect ourselves against error, fraud and theft (for example, by using your information to verify your identity); and
- To provide information to you about products and services that we believe may be of interest to you.

WHO DOES TUA™ DISCLOSE YOUR PERSONAL INFORMATION TO?

Tua may share personal information with certain of its employees and third parties who assist us in our business. In the course of conducting our business, we may also disclose personal information to other financial service providers and others that are involved in our business or industry. For example, your personal information may be disclosed during a check of your credit.

Where you request credit (either directly, or as a guarantor), we may share your personal information with (i) credit bureaus, credit reporting agencies and financial institutions to confirm your financial situation and your initial and ongoing eligibility for our credit services; (ii) persons retained to administer or service your loan for the purpose of such administration or servicing; (iii) persons (or their permitted assignees) involved in the financing or securitizing, or facilitation of the financing and securitizing, of our credit business for the purpose of their providing or facilitating such financing or securitizing (which may include the administration or servicing of your loan by them or their agents); and (iv) other persons as necessary for the provision of credit services to you and the protection of our business. We may also disclose your personal information to our marketing partners so that they can provide information about products and services that we believe may be of interest to you.

In the event of a change in ownership, or the grant of a security interest in, all or a part of Tua through, for example, an asset or share sale, or some other form of business combination, merger or joint venture, personal information may be disclosed or transferred to another party, provided that the party is bound by appropriate confidentiality agreements or obligations.

Occasionally we may use third parties located outside of Canada for processing or storing your personal information. If you would like to obtain information about our policies and practices regarding the use of these service providers or the ways in which your information is handled by these service providers, please contact our Privacy Officer at help@tua.ca.

HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

Tua is committed to maintaining the accuracy, confidentiality and security of the personal information under our control. We use physical, procedural and electronic security measures designed to prevent any loss, misuse, unauthorized access, disclosure or modification of your personal information.

ACCESSING & UPDATING YOUR PERSONAL INFORMATION

It is important that the information contained in our records is both accurate and current. If your personal information happens to change during the course of our relationship, please keep us informed of such changes. You can ask to see your personal information. If you want to review, verify or correct your personal information, please contact our Privacy Officer. Please note that such communications must be in writing.

PRIVACY OFFICER & QUESTIONS

In order to ensure compliance with our privacy policies and practices, we have appointed a Privacy Officer to oversee all aspects of our privacy initiatives. Should you have any questions in respect of this Privacy Policy or would like further information concerning our privacy policies or practices, our Privacy Officer may be contacted via e-mail at help@tua.ca

CONSENT

You agree that we may verify your name, address, phone number, and other account details with information about you held by third party sources including credit reporting agencies, banking institutions, and your mobile service provider in order to verify your identity and help protect against potential fraud, such as when someone other than you is trying to use your account or conduct a transaction without your permission, and you provide your consent for them to disclose and/or compare your information for this purpose. Your personal information will not be shared with any third parties for any other purpose.

Your consent is important to us. When you provide your personal information to us we assume that you are consenting to the collection, use and disclosure of your personal information for the purposes for which you are providing such information and for the purposes described above. Where we already have your personal information, we assume, unless you advise us otherwise, that we have your consent for the collection, use and disclosure of your personal information for the purposes for which you have provided such information and for the purposes described above.

You may change or withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting our Privacy Officer using the address above. All communications with respect

to your withdrawal or variation of consent should be in writing and addressed to our Privacy Officer. If you do not provide your consent or if you withdraw your consent, this may affect certain aspects of our relationship, including limiting your eligibility for certain payments, benefits, goods or services provided by us.

If we send promotional materials to you through direct electronic messaging, we will send those materials to you either on the basis of our existing business relationship with you or as a result of your opting in to our promotional list to receive these types of messages. In either case, all electronic promotional messages that we send to you will contain our contact information and a means for you to unsubscribe from receiving these messages.

This Privacy Policy was last updated on February 23, 2018.