

PRIVACY POLICY – Canada

In assessing whether to provide a loan to you, Ferratum Canada Inc. (hereinafter referred to as: “www.ferratum.ca”, “we”, “our”, “us”) needs to obtain from you and other parties, personal information relating to you (“Personal Information”).

By signing the loan application form provided by us, you will be consenting to all the provisions below, as outlined on the application form.

1. Privacy Principles and Privacy Law

We take our duties of confidentiality seriously. This Privacy Statement tells you how we intend to deal with your Personal Information.

We will deal with your Personal Information in accordance with those provisions of Federal and Provincial law which bind all organizations in Canada and respective provinces, our Privacy Policy (which may change from time to time), and this Privacy Statement and Consent.

We are permitted to collect, use and disclose Personal Information under the various privacy acts applicable in Canada and respective provinces, but always only with your consent and we are required to record some of your Personal Information under other statutes, such as the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*, SC 2000, c. 17, for potential use and disclosure in the future.

2. What info we collect

We may collect and process the following information about you:

- information that you provide by filling in forms on our website (www.ferratum.ca and any of its sub-pages), including information provided at the time of applying for a loan or requesting other products or services;
- banking information collected from your physical or online bank statements;
- details of loans you apply for through our website and use of SMS messages and details of the status of your loan account with us;
- Credit history and financial and identity information from third parties;
- if you contact us for any reason, we may use and process any personal details that you provide and keep a record of the correspondence.

We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

We may also collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

3. The purposes for which we collect and use your Personal Information

We collect your Personal Information so that we can:

- process your application for a loan;
- determine your personal and/or commercial credit worthiness;
- assess the risk of you defaulting on your obligations to us;
- undertake risk assessment and management involving credit scoring, portfolio analysis, reporting and fraud prevention and claim recovery;
- if your application is successful, provide you with a loan and determine on what terms we shall do so; and
- to carry out our obligations and enforce our rights arising from any contracts we enter into with you;
- to understand your needs and provide you with a better service (this may include contacting you for market research purposes and we may use the information provided to customise our website according to your interests);
- for internal record keeping (including details of your loan account and any correspondence between us and you);
- to improve our products and services and to notify you about changes to our service;
- to allow you to participate in interactive features of our service, where you choose to do so; and comply with any legislative and regulatory requirements.

If you do not provide us with your Personal Information, we will be unable to, amongst other things, process your application and assess the risk of providing you with a loan.

4. Exchange of Personal Information with Third Parties

We may disclose your Personal Information with:

- credit reporting agencies, ratings agencies and any business which provides information about the credit worthiness of persons;
- referees nominated by you, including your employer (in relation to your employment status and income);
- our professional advisers, contractors and other service providers (eg. IT consultants);
- your legal and financial advisers;
- Canadian Revenue Agency or other Government departments, agencies or bodies, to whom we may be required by law to disclose information;
- our parent, affiliate, and subsidiary companies including the Ferratum Group;
- our financiers;
- other credit providers and financial institutions;
- our external dispute resolution service;
- payment system operators;

- our reinsurers, insurance underwriters/providers in relation to our insurance policies;
- other third party service providers; and
- other third parties whom we are obliged to share your information in terms of legal and obligatory obligations.

We may also information from some of the parties described above, to enable us to assess your application.

We may disclose your personal information to third parties in the following circumstances:

- in the event that we sell or buy, or are in the process of selling or buying, any business or assets either in whole, or in part (in which case, we may disclose your personal data to the prospective seller or buyer of such business or assets);
- if we (or substantially all of our assets) are acquired or in the process of acquisition, by a third party (in which case your personal data may be one of the transferred assets);
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation;
- in order to enforce or apply our terms of use, any loan agreement you enter into with us or any other contracts we enter into with you. This may include disclosing your personal information with third parties for credit or debit card clearance, credit reference checks, verification of your indemnity, data analysis or customer support purposes;
- in order to protect our rights, property, or those of our staff, customers or others, or for safety reasons. This includes exchanging information with other companies and organisations for the purposes of fraud protection, professional advisors and credit risk reduction.

We may also use your personal data, or pass your details to selected third parties for them to use your data, for marketing purposes on the following basis:

- if you are an existing customer, we may contact you by electronic means (e-mail or SMS) with information about products and services similar to those which have previously been provided by us to you (unless you let us know that you do not wish us to do so);
- we may contact you by post or telephone to provide you with information about other products and services which may be of interest to you (unless you let us know that you do not wish us to do so);
- we may contact you by email or SMS about other products and services which may be of interest to you only if you have consented to this;
- selected third parties may contact you by post, telephone, email or SMS about other products and services which may be of interest to you where you have expressly consented to this.

If you no longer want us to use or share your Information for marketing purposes, as described above, please contact us by mail:

Ferratum Canada Inc – Attn: Privacy Officer
250 University Ave, Suite 200, Toronto, ON, M5H 3E5

Email: customer care@ferratum.ca

To opt out of our e-mail communications, you may click the unsubscribe link at the bottom of the email message or email.

5. Credit Reporting Agencies and Other Credit Providers

Specifically, by entering into the loan application, you consent to and authorize us before, during or after the provision of credit to you:

- to give to a credit reporting agency Personal Information necessary to ascertain your identity and, to advise a credit reporting agency that you have applied for a loan, the amount of the loan, our status as a current credit provider to you, payments that are overdue for more than 60 days and for which we have commenced collection action, payments which are no longer overdue, cheques that have been drawn by you, which have become dishonoured, when a serious credit infringement has been committed, or that the full amount of your loan has been paid (or your loan has been otherwise discharged); The above information may be given in order to obtain a credit report about you or to enable the credit reporting agency to create or maintain your credit information file;
- obtain from a credit reporting agency a credit report containing personal credit information and/or commercial credit information about you and to use the information contained in such reports to assess your application for a personal or commercial loan; and
- to give and obtain from other credit providers including those named in your loan application and other credit providers that may be named in a credit report issued by a credit reporting agency any information or record that has any bearing on your credit worthiness, for the purposes of assessing whether to approve your application for a loan, to notify other credit providers of a default by you, to exchange information with other credit providers as to the status of our loan to you where you are in default with other credit providers and to generally assess your credit worthiness.

6. Security

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk.

Once we have received your information, we are committed to ensuring that it is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology.

7. Access and correction of your Personal Information

It is important to us that the Personal Information we hold about you is accurate, complete and up to date. If you are aware that this is not case and would like your Personal Information corrected, or simply desire access to your Personal Information, please contact us at:

Privacy Officer Ferratum Canada Inc

Mailing Address: 250 University Ave, Suite 200, Toronto, ON, M5H 3E5

Ph: 1877-880-3099

Email: customercare@ferratum.ca

You can ask to obtain access to Personal Information we and/or our contractors hold, although under some circumstances permitted by law, you may not be provided with such information.

If we decide not to correct or provide you with access to your Personal Information, we will give you our reasons for our decision and all requested corrections will be annotated on our records

8. Complaints handling and our privacy policy

If you have a complaint about the way we have dealt with your Personal Information, or would like a copy of our policy on managing Personal Information, please contact us at the above telephone number and ask to speak with our Privacy Officer.

We will make all reasonable attempts to respond to your complaints or requests promptly and fairly.

If you are unsatisfied with the outcome, you may refer the matter to the Federal Privacy Commissioner or to a provincial privacy commissioner, if your province has one.

9. Electronic Transactions

The laws of all provinces in Canada enable certain transactions to be entered into electronically. It is our intention that the business relationship between us will be conducted under the provisions of these laws, which are applicable in each province.

Under these electronic transactions laws, we are not entitled to conduct our business with you electronically unless we have your permission to do so.

When submitting a loan application to us, you should be aware of the following:

1. Any electronic communication from us to you will be in a form which will be able to be saved by you, will be able to be printed by you or will be usable by you for subsequent reference;
2. Any electronic communication from us to you will either direct you to a website from which the document can be downloaded, or the communication will contain by way of attachment a copy of the communication;
3. We will retain a copy of the electronic communication for such time as we are required to by law in a form which complies with the law;

4. You have the right to withdraw your consent to receive electronic communications on giving us two business days' notice
5. We intend to communicate you electronically in all matters where we are able to by law, and we expect that you will regularly check your electronic communication systems (e-mail, fax (where applicable) and SMS in particular) to see if there is any electronic communication from us; and
6. Any SMS communication from us to you will be at no cost to you

10. Cross-Border Transfer of your Personal Information

We have affiliates and service providers located outside of Canada. As a result, we may instruct affiliates and/or service providers located in Malta, Australia and Germany or any country where we have facilities to process or store any Personal Information we collect about you. Such cross-border transfer is necessary for the provision of our services in accordance with this Privacy Policy. Please note that these countries may have different laws and requirements about privacy and data use than where you live. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security authorities in these countries may be entitled to access your Personal Information.

We protect Personal Information that is shared with outside service providers using contractual agreements. Service providers outside of Canada are not able to use or disclose Personal Information for any purposes other than our own. Any Personal Information that is transferred outside of Canada by us or our affiliates or service providers will be stored, used, shared and retained by the recipient in accordance with this Privacy Policy. In particular, each affiliate or service provider responsible for processing Personal Information must keep the Personal Information confidential, ensure its security in the course of its processing, and follow applicable legal requirements for the protection of the Personal Information.

If you have any questions about the collection, use, or disclosure of Personal Information by service providers outside of Canada, or our privacy policies, you may also e-mail our Privacy Commissioner at:

customercare@ferratum.ca; or write to us at:

Privacy Officer Ferratum Canada Inc
250 University Ave, Suite 200, Toronto, ON, M5H 3E5

11. An Act to promote the efficiency and adaptability of the Canadian economy by regulating certain activities that discourage reliance on electronic means of carrying out commercial activities, and to amend the Canadian Radio-television and Telecommunications Commission Act, the Competition Act, the Personal Information Protection and Electronic Documents Act and the Telecommunications Act, SC 2010, c 23, (the "Act")

Under the Act, we are not permitted to send you a commercial electronic message (which includes e-mail and SMS) without your consent.

We believe that communication through electronic messages is far more convenient and efficient for both you and us. Without your deemed consent to communicate through electronic messages, the only way we will be able to communicate with you is through postal mail.

By completing and submitting the loan application you are deemed to confirm to us that:

1. You have consented to us to communicate with you through electronic messages (e-mail and SMS);
2. You have considered the advantages and disadvantages of receiving communication through electronic messages;
3. You have decided that you wish to receive electronic messages from Us; and
4. You will ensure that the electronic addresses you provide to us (e-mail address and mobile phone number) will be kept up to date by you.

12. Cookie Policy

This website uses cookies, which are small data files placed on your computer, smartphone or other device when the website is accessed. A cookie does not give access to the computer or reveal information other than the data the customer chooses to share with us.

When you visit this website, you will be asked to accept the use of cookies.

Today almost all websites use cookies.

Purpose of using cookies

We use cookies to understand your needs and thereby provide a better service and, in particular for the following reasons

- a) Internal record keeping
- b) Improvement of products and services

Furthermore, we use cookies to ensure that the best user experience is provided on the website and display advertisement relevant for the customer. Cookies are used to “remember” when the customer’s computer or device access the website and allow web-based applications to respond to the customer individually. The purpose of the web applications is to tailor the required operations for the customer’s needs – likes and dislikes – by gathering and remembering information regarding the customer’s preferences.

Used cookies

Listed below are the main cookies that might be used by us when you enter the website.

- a) Session ID cookie: Enables us to keep track of customer’s movement switching between pages in order for the customer not to be asked repeatedly for information already provided. This type of cookie allows the customer to proceed

through numerous pages of the website quickly and easily without having to authenticate or reprocess each new visited area.

- b) Load Balancer cookie: This type of cookie is essential in order to ensure that the website loads efficiently by distributing visits across multiple web servers. When distributed, the cookie does not contain personal information of the customer and the duration of use is limited to the customer's visit on the website, hence the cookie is deleted when the web browser is closed.
- c) Affiliate tracking cookie: Reports to us that the customer has reached the website via an affiliate link in order for us to tailor the application experience. Furthermore, this is supplementary achieved by use of a unique URL identifier in the description URL when the customer initially visits the website.

Cookies may also be set by third parties. However, none of these third parties are able to collect personal data from which they would be able to identify a customer on an individual basis.

Web Analytics:

These cookies track how visitors use the website in order to improve our services. For example, we use Google Analytics – a popular web analytics service – provided by Google. The customer can find more information regarding how these cookies are used on Google Privacy's site.

Advertisement tracking:

These cookies are used to collect non-personal information regarding the customer's interaction with advertising on other websites prior to them arriving at our website and which advertisements are preferred by the customers. This information helps us to deliver advertisements relevant to the customer's interests and preferences, control the number of times the customer sees a given advertisement and measure the effectiveness of advertisement campaigns.

Website testing:

These cookies allow us to show different versions of the same page or feature on the website and thereafter track to see which version performs best. We use a cookie to manage which version to display when the customer visits the website. The specific variation that the customer will see is randomly chosen and no personal information is stored or tracked through this cookie.

Cookie control

You can choose to accept or decline all cookies used on the website. Cookies may, according to law not be used unless the customer has consented hereto. Your explicit consent will be requested in relation to the first use of the website and the applications. Furthermore, you have the right to access, modify or delete personal data disclosed by use of cookies.

Most web browsers automatically accept the use of cookies. However, you may usually modify the browser's settings to decline cookies if preferable. The "help function" within the browser should be able to guide the customer.

Alternatively, you may visit <http://www.allaboutcookies.org/> (available in English, Spanish, German and French). This website contains comprehensive information on how to make special settings on a wide variety of browsers. You may locate details on how to delete cookies from the computer (including those from this visit), as well as more general information regarding cookies.

Please be aware of that modifications or declining of consent may prevent you from taking full advantage of the website.

Storage of cookies

The specific time of storage varies from cookie to cookie. However, the period is restarts whenever the website is visited.

13. Links to other websites

Our website may contain links to other websites. When the customer uses a link and leaves this website, we will no longer have control over the website, hence this present privacy and cookie policy will not be applicable.

We advise to exercise caution and read the privacy and cookie policy applicable on the website in question.

This Privacy Policy may be revised from time to time. We disclose the amended Privacy Policy on our website www.ferratum.ca. We encourage you to visit this website frequently to obtain the current version. Your continued use of our services following any changes to this Privacy Policy constitutes your acceptance of any such changes.

This Policy is effective as of 02.06.2017.