

Introduction

Your privacy and keeping Your personal information secure are extremely important to us. At **Paradech**, we are committed to protecting and respecting Your privacy and handling Your information in an open and transparent manner.

This Privacy Policy ("Policy") explains among other things: what we do with Your personal information; what we do to keep it secure; with whom we share Your information; Your rights in relation to the personal information we hold about You; and who You can contact for more information. In this Policy, references to "You" and "Your" are references to users of our website, a customer, and a consumer.

We will amend or update this Policy regularly to reflect changes in our practices with respect to the processing of personal information, or changes in applicable law. We encourage You to read this Policy carefully, and to regularly check this page to review any changes we might make to the terms of this Policy.

If You don't want to read all the details. Here are the highlights that You may really wish to know:

Where appropriate, we share Your personal information within **Paradech** —, our affiliates, partners, and other companies. Upon request or where we are legally obliged, we may share Your information with public agencies.

We also collect from You information in relation to other people (for example, details of the recipients of Your money transfers). In providing this information, You confirm to us that You have their permission to do so.

We use third parties to process Your personal information on our behalf to perform our services for You, and due to the international nature of our business, some of them are based outside Canada.

You have several rights over Your personal information, and the manner in which You can exercise those rights is contained in this Policy.

We will send You direct Marketing if You have agreed to receive it. We do this to encourage You to use our services and send You offers or promotions that may interest You. You can ask us to stop sending You marketing information at any time, either by sending us an email at support@paradech.com or by selecting the unsubscribe button at the bottom of any email communication You may receive from us.

We may use Your personal information to display online advertisements and Marketing relating to our services on our website or online media channels only if You have selected to accept all cookies.

Definitions

To help clarify our meaning, we have used certain capitalized terms in this Policy. These terms and their meanings are:

- **"Cookie"** means a small text file which includes a unique identifier that is sent by a web server to the browser on Your computer, or any other internet-enabled device, when You visit an online site.
- **"Data Protection Legislation"** means the Personal Information Protection and Electronic Documents Act (PIPEDA), Canada's Anti-Spam Legislation (CASL), and such applicable legislation as may exist in Your Province or Territory of residence.
- **"Marketing"** means any action or advertisement or promotion or marketing material like surveys, vouchers, research, and events. This list is not exhaustive.
- **"Services"** means **Paradech** services and such other services or products that we may introduce from time to time.

Who are we?

Paradech ("Paradech", "We", "Us", "Our"), a Canadian corporation, is committed to protecting and respecting Your privacy, handling Your information in an open and transparent manner, and keeping Your information secure.

The personal information we collect about You

We may collect, record and use information about You in physical and electronic form and will hold, use and otherwise process this data in accordance with the Data Protection Legislation and as set out in this Policy.

The personal information we collect and use may include, among other things:

- Your name, company name, and title
- Your contact information such as Your email address, postal address, and telephone number, or any telephone number used to call us.
- Your demographic information such as age, education, and interests;
- Evidence of Your identity (for example, passport information, government-issued identification, and driver's license);
- Unique identifiers such as Your username and password;
- Your profiles and postings on any other social media applications and services that we provide or that You make available to us;
- Your payment details and other financial data (for example, Your bank or payment method provider's name) and salary details; and
- Information about Your visit to our website, including the full Uniform Resource Locators (URL), clickstream to, through, and from our website (including date and time), length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

We also collect from You information in relation to other people (for example, details of the recipients of Your money transfers), where You provide us with such information. In providing this information You confirm to us that You have obtained all necessary permissions from them to the reasonable use of their information for the purposes and in the manner described in this Policy or are otherwise permitted to give us this information on their behalf. Please also ensure that those other people are aware of this notice and that the provisions of this notice are clearly communicated to them.

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How we collect Your personal information

- **Information You give to us when You use our services.** If You use our services, You will need to provide certain information, including Your name, address, and debit card number, as well as the name and other details of the recipients of the money transfers that You instruct us to carry out. This information must be complete and accurate; if not, we may have to take additional steps to complete the transaction.
- **Other information You give to us.** This is information about You that You give us by filling in forms on our website (for example, the 'contact us' section) or when You communicate with us by phone, email, or otherwise. It includes, for example, information You provide when You register on the website for us to contact You, when You inquire about any of our Services, when You sign up to receive notifications, and when You report a problem with our website. The information You give us may include, among other data, Your name and email address.
- **From other members of Paradech .** We may collect information about You from our affiliates in Canada and other subsidiaries or affiliates globally.
- **Social Media.** Depending on Your settings or the privacy policies for social media and messaging services such as Facebook, LinkedIn, and Instagram, You might give us permission to access information from those accounts or services.
- **Other Sources.** We may receive information about You from other sources, including publicly available resources, e.g., newspapers, internet sites, registries, or public records, and combine this data with information we already have about You. This helps us to update, expand, and analyse our records and provide services that may be of interest to You.

Information we collect about You.

1. Cookies and similar technologies.

When You visit our site, we may place Cookies onto Your device, or read Cookies already on Your device, subject always to obtaining Your consent, where required, in accordance with applicable law. We use Cookies to record information about Your device, Your browser, and, in some cases, Your preferences and browsing habits. We may use Your personal information through Cookies and similar technologies, in accordance with applicable regulations.

Like most websites, we use "Cookies" and similar technologies to help us make our site – and the way You use it – better. Cookies mean that a website will remember You. They are small text files that websites transfer to Your computer (or phone/tablet). Cookies and similar technologies are widely used to make websites work efficiently and to collect information about Your online preferences; they improve website use and speed – for example, by automatically filling in Your name and address in text fields.

2. Log Files.

In addition, with regard to each of Your visits to our site, we will automatically collect certain information (for example, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data). We may combine this automatically collected log information with other information we collect about You.

3. Social Media Widgets.

Our website includes Social Media Widgets or Features, such as the Facebook Like button and Twitter button, which are interactive mini-programs that run on our site to provide specific services from another company (e.g., displaying news, opinions, music, etc.). Personal information, such as Your email address, may be collected through the Widget. Cookies may also be set by the Widget to enable it to function properly. Information collected by this Widget is governed by the privacy policy of the company that created it.

4. How we use Your personal information

Our primary purpose in collecting user information is to provide You with a safe, smooth, efficient, and customised experience and to provide the services You have requested from us. We may also use the information that You have provided to ensure that the content on our site is presented in the most effective manner for You and Your computer or device.

We use Your information for the following specific purposes:

- To carry out our obligations arising from any contracts entered into between You and us or from applicable law such as anti-money laundering laws, and to provide You with the Services in accordance with our Terms and Conditions and with this Policy;
- To register You with an account;
- To fulfil Your Transaction/Request;
- To send You confirmations or other notifications;
- To notify You about temporary or permanent changes to our services or other service-related messages;
- To assist You where online applications are not completed;
- To prevent fraud, money laundering, and any other illegal activity;

- To ensure that content from our site is presented in the most effective manner for You and for Your computer;
- To promote our business;
- To send You Marketing communications, as applicable, provided that You have given us Your contact details and that You do not decide to opt out from this type of communications, in accordance with Data Protection Legislation;
- To administer our site and for internal operations, including troubleshooting, data analysis, profiling and segmentation analysis, testing, research, statistical and survey purposes;
- As part of our efforts to keep our site and our services safe and secure;
- Analytics, web traffic analysis, to measure or understand the effectiveness of advertising we serve to You and others, and to deliver relevant advertising to You;
- To make suggestions and recommendations to You and other users of our site about services that may interest You or them;
- To train, monitor, and assess the effectiveness of the manner in which we provide the Services to You;
- To consider and investigate any concerns or complaints You may have; and
- To display personal testimonials of satisfied consumers on our website in addition to other endorsements, where You have agreed with a third-party review site that we may do so. If You wish to update or delete Your testimonial, contact us at support@paradech.com

Paradech will not sell, rent, or otherwise disclose Your information to third-party marketers or others unaffiliated with **Paradech** or other partners for the purpose of advertising, promoting, or selling other services to You. However, where and to the extent permitted by law, **Paradech** may work with third parties to analyze the information that we gather from You when You visit our website, our LinkedIn page, Facebook page, and our online advertisements, whether or not You use the **Paradech** service. For further information, see the "Who we might share Your personal information with" section of this Privacy Policy.

Direct Marketing:

We may use the contact details You provided to send You marketing communications by email, telephone, or other communication formats about similar products or services where permitted by applicable law (unless You have opted out).

In other cases, we may ask for Your consent to send You marketing communications about products or services offered by **Paradech Group**, its affiliates, and other partners.

Opting Out of Direct Marketing:

You can opt out of receiving **Paradech Group** marketing communications by modifying Your email subscriptions by clicking on the unsubscribe link or following the opt-out message included in the communication.

Alternatively, simply send an email to support@paradech.com and include the email address that You wish to have removed in Your message.

Please note that if You request we stop sending You marketing messages or You unsubscribe, we may continue to send You service and administrative communications, such as transfer updates and other important information regarding Your transaction.

Who we might share Your personal information with

Your personal information is very important to us. However, there are circumstances where it is necessary for us to share Your information for legitimate business purposes (including operating our site, and providing services to You), in accordance with applicable law and subject to applicable professional and regulatory requirements regarding confidentiality and professional secrecy. In addition, we may disclose Your personal information to:

Our affiliates

we share Your information with our affiliates:

- for our internal business, operational, management and service needs;
- for compliance, regulatory and audit activity and in connection with legal, regulatory and tax claims and investigations;
- to understand and support our customers, consumers and other individuals who use our services, apps and visit our sites; and
- to send Marketing communications to You.

Third party processors

This includes people with whom we do business or who provide services to us. If we engage a third-party processor (Processor) to process Your information, the Processor will be subject to binding contractual obligations to: only use the personal information in accordance with our prior written instructions; and implement measures to protect the confidentiality and security of the personal information, together with any additional requirements.

We may disclose data to provide our services, respond to legal requirements, enforce our policies, liaise with judicial or regulatory authorities where required under applicable law, and protect our rights and property. Processors may include:

- Credit reference agencies or other service providers to verify Your identity or the identity of recipients of the money transferred through our services, or for any other purpose related to providing our services;
- Professional advisers, such as our auditors and lawyers;
- Companies that capture or analyse information to help us understand how our services and sites are used and perform, or to tailor our services and promotions, including for the purpose of allowing us to improve the services we provide;
- Companies that provide us with marketing assistance, including the management of email marketing operations and other services that deploy marketing on the internet or social media platforms; the running of surveys and other feedback activities; and the analysis of the effectiveness of any marketing or consumer engagement we do;
- Banks, payment card processors, and other service providers that process bank transfers, credit and debit card payments, or otherwise provide financial infrastructure services to enable us to provide our services;
- Our service providers, including those who provide data hosting services, fraud prevention services, technology services, and technology tools that allow us to monitor, test, and improve our services and sites;
- Companies that we have instructed to provide services to or for us for purposes reasonably ascertained from the circumstances in which the information was submitted;
- Other business entities should we plan to merge with, be acquired by, or be invested in by that business entity, or if we undergo a corporate re-organisation
- Any successor in business to us.

Fraud Prevention Agencies

Where we have a good reason to suspect fraud, money laundering, counter terrorist financing or any other illegal activity we can, upon request or where legally obliged, share Your personal information with crime prevention agencies and other third parties for the purpose of detecting, preventing, or reporting crime, or for actual or suspected breach of any applicable law or regulation. These third parties may include business partners and companies that

provide services to us, law enforcement bodies, regulatory and supervisory authorities, providers of fraud prevention and detection services. Please note, we may suspend activity on Your account or any transaction, refuse access to Your account or cancel any transaction You may want to make, if we think there is a risk of any illegal activity.

Public Agencies

We release accounts or other personal information when we consider it appropriate to comply with the law, to enforce our Terms and Conditions and any other agreement, or to protect the rights, property, or safety of **Paradech Group**, our employees, consumers, business partners, and the public. In these circumstances, we will only provide the information required for them to perform their function.

Research companies

We may share personal information in a secure way to allow research companies and feedback providers to contact You directly on our behalf to get Your opinions on or refuse to take part in the research or surveys.

Links to Other Sites

Our sites may contain links to other websites, including via our social media buttons. While we try to link only to websites that share our high standards and respect for privacy, we are not responsible for the content, security, or privacy practices employed by other websites and a link does not constitute an endorsement of that website. Once You link to another website from our site You are subject to the terms and conditions of that website, including, but not limited to, its internet privacy policy and practices. Please check these policies before You submit any data to these websites.

International transfer of Your personal information

Due to the international nature of our business, we may need to transfer Your personal information to other **Paradech** entities, to other third parties as noted in the "Who we might share Your information with" section of this policy, and to recipients in connection with the purposes set out in this Policy. For this reason, we may transfer Your personal information to other countries that may have different laws and data protection compliance requirements from those that apply in the country in which You are located. **Paradech** will take reasonable steps to ensure that personal information is protected and any such transfers comply with applicable law.

Paradech may transfer the personal information of customers or consumers covered by this policy to servers or databases outside of the European Economic Area (EEA) only for the purpose of executing an international payment. Some of these countries may not have the equivalent level of protection under their data protection laws as in the EEA.

How we keep Your personal information secure

We have implemented appropriate administrative, technical, and organizational security measures designed to protect Your personal information against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access, and other unlawful or unauthorized forms of processing, in accordance with applicable law.

Unfortunately, the transmission of information via the internet (including by email) is not completely secure. Although we will do our best to protect Your personal information, we cannot guarantee or warrant the security of Your data transmitted to our site; any transmission is at Your own risk. Please note that You are responsible for maintaining the security of Your credentials used to access any **Paradech** service or account, and You must report suspected unauthorized activity to us. Once we have received Your information, we will use strict procedures and security features to try to prevent unauthorized access.

We make reasonable efforts to restrict access to information to only those employees, contractors, and agents who need such access in order to operate, develop, improve, or deliver our programs, products, and services.

Protecting Your own information

It is important to keep Your password secure to prevent fraudulent use of Your account. Do not disclose Your password to anyone else, especially anyone who requests it from You by telephone or email. **Paradech** will never ask You to provide Your password or personal information via email. Please be aware of the following:

- Change Your password regularly and avoid using the same password on other websites to prevent hackers from accessing Your account;
- Avoid simple passwords that can easily be guessed;
- Be aware that public WiFi networks are risky, and hackers may capture Your online transactions and personal information. Only connect to networks You can trust;
- If You use a shared computer, make sure You log out immediately after You have finished using the website; and
- Beware of 'phishing,' where criminals may attempt to steal Your information by sending You bogus emails.

How long will we keep Your personal information

We take every reasonable step to ensure that Your personal information is only retained for as long as it is required for the purposes set out in this Policy. Therefore, we will only keep the information we collect about You for as long as required for the purposes set out above, or as required to comply with any legal or regulatory obligations to which we are subject. This will involve us regularly reviewing our files to check that information is accurate, up-to-date and still required.

The period for which we will retain information about You will vary depending on the type of information and the purposes for which we will use it. Generally, unless applicable law or our legal and regulatory obligations require a longer retention period, we will keep our records for at least five years after You have terminated Your relationship with us.

Your Rights

Subject to applicable law, You may have a number of rights regarding our processing of Your relevant personal information, including:

- the right not to provide Your personal information to us (however, please note that we may be unable to provide You with the full benefit of our site, or our services, if You do not provide us with Your personal information);
- the right to request access to Your personal information, together with information regarding the nature, processing, and disclosure of that personal information;
- the right to request the correction of any inaccuracies in Your personal information;
- the right to request the erasure of Your personal information. This is also known as the right to be forgotten. We will keep a note of Your name if You ask for Your personal information to be erased;
- the right that we restrict our use of Your personal information;
- where we use Your personal information on the basis of Your consent, You have the right to withdraw that consent (noting that such withdrawal does not affect the lawfulness of any processing performed prior to the date on which we receive notice of such withdrawal and does not prevent the processing of Your personal information in reliance upon any other available legal basis); and
- the right to lodge complaints with a Data Protection Authority regarding the use of Your personal information by us or on our behalf.

We may require proof of Your identity before we can give effect to these rights. You should also be aware that some of these rights are qualified and not absolute; therefore, exemptions or limitations may apply. For example, we can refuse to provide information if fulfilling Your request would reveal the personal information about another person, or if You request that we delete information which we are required to retain by law, have compelling legitimate interests to keep, or need access to fulfil our legal obligations.

You can contact us at support@paradech.com if You want to enforce any of these rights. We will comply with our legal obligations as regards Your rights as a data subject.

Any request for access to Your personal information must be in writing, and we will endeavour to respond within a reasonable period and in any event within one month (three months for complex or numerous requests), in compliance with Data Protection Legislation. We reserve the right to charge a reasonable fee (reflecting the costs of providing the information) or to refuse to respond where requests are manifestly unfounded or excessive: in this case, we will explain the situation to You and inform You about Your rights.

Contact us

Questions, comments, and requests regarding Your personal information and our Policy are welcome and should be sent to support@paradech.com

You may also use these contact details if You wish to make a complaint to us relating to Your privacy.

If You have any concerns about our use of Your information, You can make a complaint to the Privacy Commissioner or the relevant regulatory authority in Your Province or Territory of residence.

Please note that Personal Information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.

Categories of Personal Information Collected

In the preceding 12 months, we have collected the categories of personal information listed below. For more details about the data points we collect, please see the "The personal information we collect about You" section in our main privacy policy.

- Identifiers – For example, name, company name, title, postal address, email address, unique personal identifier, Internet Protocol (IP) addresses, government-issued identification numbers such as social insurance number, driver's licence number, passport number, or other similar identifiers.
- Personal information categories from applicable privacy laws – For example, name, social insurance number, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, or other financial information.
- Commercial Information – For example, records of Your transactions or other money transfer or remittance histories.
- Internet or other similar network activity – For example, browsing history, search history, and information regarding a consumer's interaction with an Internet website, application, or advertisement.
- Data – For example, inferences drawn from personal information to create a profile about a consumer reflecting the consumer's preferences and characteristics.

Business or Commercial purposes for using Your personal information

All the categories of personal information we collect about You (as detailed above) are used for the following purposes. For more details on our use of Your personal information, please see the "How we use Your personal information" section in our main privacy policy:

- Providing our services (money transfers, account servicing and maintenance, customer services, advertising and marketing, analytics, and communication about our services).
- For our operational purposes and the operational purposes of our service providers and integration partners.
- Improving our existing services and developing new services.
- Prevention, detection, protection, and prosecution of security incidents, illicit or fraud-related activity.
- Bug prevention, error reporting, and activities to maintain the quality or safety of our services.
- Auditing consumer interactions on our site.
- Short-term use, such as customizing the content of our website.
- Our legitimate interests in promoting our business.
- To send You marketing information about products and services from Paradech and its affiliates.
- Any other use that we will inform You about.

Sale of Your personal information

Under applicable privacy laws, some sharing of personal information (like Your name, email address, etc.) may be considered a "sale." We don't sell Your personal information for money; however, we may allow certain third parties to use that information for purposes that may not directly benefit **Paradech** .

Your Rights

Subject to exceptions, You may have a number of rights regarding our processing of Your personal information, including:

- The right not to provide Your personal information to us (however, please note that we may be unable to provide You with the full benefit of our site, or our services, if You do not provide us with Your personal information);
- The right to request access to Your personal information. You have the right to request that we disclose the categories of personal information that we collect or use. You may also request the specific information that we have collected about You. However, we may withhold some information where the risk to You, Your personal information, a third party, or our business is too great to disclose the information;
- The right to request the correction of any inaccuracies in Your personal information;
- The right that we restrict our use of Your personal information;
- The right to request the deletion of Your personal information. We will delete Your personal information on receipt of a Verifiable Consumer Request. You should also be aware that this right is qualified and not absolute. Therefore, we may refuse to delete Your personal information if we need it for one or more of the following purposes:

Contract:

- To complete the transaction for which we collected Your personal information;
- To provide a product or service which You have either requested, or You would reasonably expect in the context of our relationship with You; and
- To carry out a contract with the consumer.

Security:

- To detect security incidents;
- To protect against malicious, deceptive, fraudulent, or illegal activity; and
- To prosecute people responsible for such activities.

Debugging in order to detect and repair errors that affect intended functionality.

To comply with Canada's Electronic Communications Privacy Act.

Research:

- To engage in public or peer-reviewed scientific, historical, or statistical research, that:
- Is in the public interest;
- Would be seriously impaired or impossible to carry out without retaining the personal information; and
- Has been consented to by the consumer.

Internal purposes:

- To use it for a purpose that is:
- Internal to **Paradech** ; and

- In line with the reasonable expectations of the consumer, in the context of their relationship with our business.

To comply with a legal obligation.

For the establishment, exercise, or defence of legal claims.

Other purposes:

- To use it for any other purpose that is:
- Lawful; and
- Internal to **Paradech** .

How to exercise Your rights of access and deletion

To exercise Your rights, please submit a verifiable request to us by sending an email to support@paradech.com Only You, or a person authorized to act on Your behalf, may make a verifiable request related to Your personal information.

You may make a verifiable request for access, deletion, and portability twice within a 12-month period. The verifiable request must:

- Provide sufficient information that allows us to reasonably verify You are the person about whom we collected personal information or an authorized representative;
- Describe Your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

If You have an account with us, logging into Your account and sending us a request through the account will serve to verify Your identity and request, although we may request additional information if we believe Your account has been compromised.

For security reasons (and notwithstanding any of the above), we cannot respond to Your request or provide You with personal information if we cannot verify Your identity or authority to make the request and confirm the personal information relates to You. We will only use personal information provided in a verifiable request to verify the requestor's identity or authority to make the request.

We will deal with Your request within 45 days. If reasonably necessary, we can extend this period by an additional 45 days. We shall notify You if we extend this period.

Right of non-discrimination

You have the right not to receive discriminatory treatment from Paradech for exercising Your privacy rights. Please note: this right is a "passive right" and so You cannot actively exercise it.

Unless permitted by applicable privacy laws, we will not:

- Deny You goods or services;
- Charge You different prices or rates for goods or services, including through granting discounts or other benefits or imposing penalties;
- Provide You with a different level or quality of goods or services;
- Suggest that You may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer You certain financial incentives permitted by applicable privacy laws that can result in different prices, rates, or quality levels. Any permitted financial incentive we offer will reasonably relate to the value of Your personal information and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires Your prior opt-in consent, which You may revoke at any time. However, we do not currently provide any financial incentives.

If You feel that You have received discriminatory treatment as the result of exercising Your privacy rights, You may contact us at support@paradech.com You can also contact us regarding our privacy policy and practices at the same email address.

Please contact us for any questions you may have at support@paradech.com