

# Privacy Policy

SimplyBorrowed is committed to the protection of personal and private information. As part of this commitment, we have prepared this Privacy Policy to describe the manner in which SimplyBorrowed collects, uses, discloses and otherwise manages information about you (“Personal Information”) in connection with your access to and use of our Services.

SimplyBorrowed may provide third party content or links to third-party web sites or applications. When you leave our Services or interact with a third-party feature, you should read the applicable third party’s privacy policies and terms of service to make sure you understand how they might collect and share information about you.

We do not share your credit reports or credit scores with third parties and we do not share your Personal Information with third parties for their advertising or marketing lists without your consent.

If you do not agree with any term in this Privacy Policy, please do not provide us your information or use our Website or Services.

## **COLLECTION AND USE OF INFORMATION**

The ways we collect information about you include:

- information you give us
- information we collect from third parties about you
- information we collect about you based on your use of our Services

## **INFORMATION YOU GIVE US**

You may give us information about you when you use our Services or by communicating with us. This includes information you provide when you create an account to use our Services, answer specific questions through various forms, provide us with feedback, participate in surveys, contests or promotions and when you contact us with a question or to report a problem.

The information you give us may include your name, contact information (such as mailing address and email address), date of birth, income, information about your rent or mortgage payments, credit-related information, your financial goals, referral source, credentials for third party services when you authorize us to connect to them on your behalf and your social insurance number. You are not required to provide your social insurance number in order to use our Services. 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.

If you use some of our Services (such as if you are approved for a loan), we may ask you to provide other information including proof of income (such as pay stubs or Notices of Assessment from your tax return), your Canadian bank account details (account number, transit, etc.), purpose of the loan, and information regarding your employment such as occupation, current or former employer(s). We may also collect personal and employment references with your consent. For some of our services, we also require you to verify or connect your bank account using a third party service to ensure we deposit and/or withdraw your funds through the correct account (your credentials are securely maintained by our service provider). For a loan, as part of this verification process, we may collect transaction history from your bank

account in order to verify that your income deposits match the documents you have submitted and, in certain circumstances, to assess your suitability for the loan. We also verify your identity by asking you questions from identity verification service providers or by verifying your name, address, date of birth and mobile phone number with your mobile service provider.

We may also collect additional information as otherwise described to you at the point of collection or pursuant to your consent.

We 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.

## **INFORMATION WE COLLECT FROM THIRD PARTIES ABOUT YOU**

We collect Personal Information from third parties or service providers with your consent or where otherwise permitted or required by law. This information includes the credit reports and credit scores we obtain from Equifax or other credit reporting agencies, information about your credit history and other financial information which is relevant to the provision of our Services, as well as information which is gathered in order to verify your identity and prevent fraudulent or illegal activity. We also work closely with third parties (including, for example, business partners, service providers, advertising networks, analytics providers, search information providers, social media) and may receive information from them, such as whether or not you have taken out a product with them, what other products you may have used, and other such details. We might also collect information from other users like you through things like a member referral program.

If you apply for a loan using our Website will be asked to provide consent to SimplyBorrowed obtaining a credit score and/or report from a credit reporting agency. By providing such consent, you consent to SimplyBorrowed or its service provider, affiliates or agents obtaining and using credit and other personal information about you (including credit reports) from any credit reporting agency, and exchanging information with any of them, on an ongoing basis. You acknowledge that this consent is effective immediately upon submitting your application and is being obtained to determine your eligibility for a loan, and if approved, to open and administer your loan, review and verify your ongoing creditworthiness, and manage and assess risk. You authorize any credit reporting agency to provide this information to SimplyBorrowed and any of its service providers, affiliates or agents.

## **INFORMATION WE COLLECT ABOUT YOU BASED ON YOUR USE OF OUR SERVICES**

Each time you visit our Website we may automatically collect certain information about how you access and interact with our Services. We and third parties may use various technologies to collect, use and store this information. These may include cookies, browser web storage, web beacons and similar technologies. The information we may automatically collect includes the following:

- Website Information:
- App Usage Information & Analytics:
- See Cookies and Interest-Based Advertising below for more information

## USE OF INFORMATION WE COLLECT

Some examples of how we use the information we collect may include, but are not limited to, the following:

- assessing your application and eligibility for a loan and, if approved, administering your loan and collecting outstanding debts
- managing your account and relationship with us and to, communicate with you by telephone, mail, email, text (SMS) message or other electronic means about your account
- verifying your identity as part of our identity authentication process and other information you have provided to us (including your bank account, employment and income)
- providing you with information, products and Services
- notifying you about changes to our Services
- ensuring that content from our Website is presented in the most effective manner for you and your device
- aggregating it on an anonymous basis with other data for data analysis and reporting purposes
- undertaking analysis of your credit information and bank account data in order to identify and inform you of products that we consider are likely to interest you or be suited to your circumstances or to enhance our Services
- responding to your inquiries about our Website and Services
- meeting legal and regulatory requirements
- detecting and preventing fraud and other unauthorized or illegal activities
- as otherwise permitted or required by applicable law.

## MARKETING COMMUNICATIONS

If you have provided your consent, we may provide you with information about SimplyBorrowed or other products and services we feel may interest you or be best for you based on credit and other information we have about you (including emails, text messages, and notifications).

You can opt-out any time by contacting us as set out under Contact Us below, or by taking the following steps:

- You can opt-out of receiving marketing emails at any time by clicking on the unsubscribe link included in our marketing email communications. Please note that you may continue to receive certain transactional or account-related emails from us.

## SHARING OF INFORMATION WE COLLECT

We will not disclose, trade, rent, sell or otherwise transfer your Personal Information, without your consent, except as otherwise set out herein. We use information we hold about you to provide our Services to you and improve those services, manage your account and communicate with you and to use information on an anonymous basis for research, profiling and analytical purposes.

**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. SimplyBorrowed uses service providers (including its authorized sub-contractors) to provide services such as billing, administration, debt collection and advertising and analytics services, to verify information

you have provided to us (such as your identity and bank account number), to access your bank account data as reasonably necessary to provide our Services and to administer pre-authorized debit agreements. SimplyBorrowed may use service providers to host the Website, App, 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 SimplyBorrowed, 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 or other consumer reporting agency:** If you have signed up for SimplyBorrowed's Services, SimplyBorrowed 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 and/or credit report for free at the time of account creation and on a regular basis thereafter for the purposes set out above in this Privacy Policy.

**Business Partners:** If you use certain Services we will share certain personal information we have about you (such as your contact information) with third party business partners . In these situations, we will confirm with you that we will be sending your information or we will send you to the business partner's site or platform for you to provide the information directly to them.

**Legal/Compliance:** SimplyBorrowed and its 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 Borrowell 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 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 or App uses a technology called “cookies”. A cookie is a tiny element of data that our Website sends to a user’s browser, which may then be stored on the user’s hard drive so that we can recognize the user’s computer or device when they return. Cookies may provide us and our service providers with information that we will use to personalize our Website and App in accordance with a user’s preferences. 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 or App, you may not be able to take advantage of all of the features of our Website or App.

We may use a third party such as Google Analytics to help us gather and analyze information about the areas visited on the Website (such as the pages most read, time spent, search terms and other engagement data) in order to evaluate and improve the user experience and the Website. For more information or to opt-out using the Google Analytics opt-out browser add-on,

see “How Google uses data when you use our partners’ sites or apps” and “Google Analytics and Privacy”.

To successfully opt out, you must have cookies enabled in your web browser (see your browser’s instructions for information on cookies and how to enable them). Your opt-out only applies to the web browser you use so you must opt-out of each web browser on each computer you use. Once you opt out, if you delete your browser’s saved cookies, you will need to opt-out again.

### **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 maintain your Personal Information on a confidential basis on servers located in Canada and the United States. 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 Website. 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 [customerservice@simplyborrowed.ca](mailto:customerservice@simplyborrowed.ca)