

PRIVACY POLICY

Table of Contents

1. Overview - Privacy Commitment and Personal Information
2. Changes to Privacy Policy
3. Automatically Exchanged Information – Website’s User
4. Collection of Information by Floria
5. Type of Collected Information
6. Purposes of Collected Information
7. Disclosure of Personal Information
8. Storage of Personal Information
9. Consent
10. Safeguards
11. Right of Access and Correction
12. Contact

1. Overview - Privacy Commitment and Personal Information

Floria Capital Ltd., its affiliates and subsidiaries (“Floria”, “we”, “us” or “our”) are committed to provide quality services to you in the respect of your rights to privacy and by protecting your personal information. In this Privacy Policy (the “**Policy**”, as it may be amended from time to time), “you” and “your” means an individual consumer, applicant or customer of Floria. Consumers are individuals who are not currently our customers; applicants are individuals who apply to become our customers; and customers are individuals who have been approved, use or have used our products and services in the past.

We collect, use and disclose personal information to operate our business and as required by law. Personal information is information about an identifiable individual, as defined in the *Personal Information Protection and Electronic Documents Act*. Examples of personal information we collect include: names, addresses, email addresses, telephone numbers, dates of birth, identification information (such as government issued identification numbers), bank account information and personal credit and financial information.

In summary, we may collect, use, hold, and disclose personal and credit related information about you so that we can:

- Accept, assess, and process your application for a loan;
- Undertake risk assessment and management involving credit scoring, identity verification, and fraud prevention. This may include checking your name against watch lists established by regulatory agencies and similar bodies in the Bahamas, Canada and other countries;
- Administer, enforce and collect on your loan;
- Provide you with information about other products or services we currently offer or may offer in the future; and
- Comply with any other legislative and regulatory requirements.

2. Changes to Privacy Policy

This Policy describes our current privacy practices. We update this Policy on an ongoing basis to ensure consumers, applicants and customers are aware of updates to our privacy practices, to streamline those practices and to comply with applicable laws. This Policy may change from time to time entirely at our discretion without prior notice and therefore we advise you to consult our Policy periodically to review our modifications and updates. If the modified terms are not acceptable to you, please do not access or use our Website or services.

3. Automatically Exchanged Information – Website’s User

Each time a user accesses our Website, an exchange of information takes place, automatically, between our Website, the computer used and Floria’s servers. This exchange is necessary for the server to transmit a compatible file with the computer equipment used by the user.

The following information is exchanged:

- The identification of the internet services provider of the user;
- The IP address of the user;
- The type of web browser and operating system being used by the user;
- The pages being consulted by the user;
- The date and time at which the user accesses the Website; and
- The referring website, if the user accesses this Website via another site.

Most of the automatically exchanged data between computers does not allow for the identification of the user; it is collected for the sole purpose of meeting the technological requirements of web browsing and is only used for the purposes mentioned in this Policy.

4. Collection of Information by Floria

Floria collects and uses personal information for purposes limited to those which are related to its businesses, which is to provide Home Equity Loans. We collect personal information primarily from you, for instance through applications and supporting documentation you provide. We may also collect personal information about you through your ongoing interactions with us, from references, employers and other financial institutions you have identified in your application as well as credit bureaus and other third party sources. In connection with loan agreements, we may also collect personal information from credit bureaus in order to verify your current and ongoing creditworthiness and other information you may provide to us.

Your personal information is also collected through the interactivity established between you and our Website and we use cookies (small computer files that a website’s server places on your computer) and / or logs to gather information about you. These cookies do not collect user’s personal information and you may at any time set your browser to block cookies. However, this action may deprive you of certain features of the Website.

5. Type of Collected Information

Floria limits the amount and type of personal information collected to which is necessary for our identified purposes, and we collect personal information by fair and lawful means.

Personal information that we may collect includes:

- Customer name and contact information, including mailing address, telephone number, fax number and/or email address;
- Additional information for identity matching and credit check purposes, such as occupation, name of employer, names and contact information for references, assets, liabilities, income, previous address, number of dependents, Social Insurance Number (SIN), date of birth or driver's license number;
- Information about the account or loan, such as current and historical information, balance and indebtedness, account transaction history and similar information and records relating to the handling of any inquiries or complaints;
- Payment-related information such as banking information; and
- Such other information that is necessary for our identified purposes and that is collected with your consent or as permitted or required by law.

6. Purposes of Collected Information

We may collect and use personal information for purposes such as, but not limited to, the following:

- *Connecting with us.* We may collect information you provide if you visit or use our Website, register or apply for a loan, interact with us through social media or online ads, participate in surveys, or engage with us in any way. We may collect that information for uses as described in this Policy. When using a public computer or sharing a computer, we recommend that you leave no trace of your activity before ending a browsing session.
- *Information about you.* If you sign up for a loan, we may collect information about your transactions, including account balances, fees, payment history and parties to transactions. We may collect information from credit reporting agencies and other outside sources to verify financial information about you, such as your employment and credit history. We may also ask you for a copy of your government identification (ID), and a photo of your face, to verify your identity. If you give us your SIN, we may use it to identify you with credit reporting agencies and other parties; we may keep this information along with other information about you in our records, even after your account is closed, for the time provided by applicable laws. When you provide authorized user information, we expect that you have authority to consent to its collection, use, and disclosure as outlined in this Policy.
- *Digital and online information.* When you visit our Website, or use our online banking or sign in to your account, we may collect information from your computer, mobile and online activity – for example, Internet Protocol (IP) address, mobile device ID, application and website use. Cookies collect information about your

online behaviour and you can set your browser to reject cookies, but this may impair our ability to customize and test your experience.

- *Third party service providers.* We may collect information about you from third parties that we have contracted with, such as credit reporting agencies or affiliates. We may collect publicly available information about you from online sources, or from surveys that you participate in.
- *Communication.* When you have a telephone conversation with one of our representatives, we may collect a recording of those conversations. Your call may be recorded for quality and training purposes, to resolve concerns, and to detect and prevent fraud. If you choose to contact us by email or mail, we may retain your email or mailing address, the content of your communication and our response.
- *Accounts.* To open, administer and service accounts and loans and to provide and administer any requested products or services and to evaluate current and ongoing creditworthiness and other requirements and to determine eligibility or suitability for our Home Improvement Loans.
- *Protection and Requirements.* To protect the business interests of Floria and its customers, including to detect and prevent fraud and other unauthorized or illegal activities and to maintain business records for reasonable periods to meet legal and regulatory record retention requirements.
- *Others.* For other purposes identified by Floria with your consent or as permitted or required by law.

7. Disclosure of Personal Information

We may disclose some of your personal information for the purposes of verifying your identity pursuant to the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* and related regulations. In addition, your personal information may be disclosed in certain circumstances including, but not limited to, the following:

- Third parties where you consent to the use or disclosure;
- To our partners in financial transactions, including financial institutions, merchants and payment organizations for the purposes of paying out loans, setting up pre-authorized debts;
- To credit reporting agencies for the purposes of maintaining your credit history, fraud reporting agencies as necessary to report actual or suspected fraud and debt collection agencies to the extent necessary to collect amounts owed to us;
- As required or authorised by law, for example, to government or regulatory bodies who have made a lawful request for the information; and

We may disclose to credit reporting agencies personal information about you for the purposes of maintaining your credit history, including:

- If you have failed to meet your payment obligations; and

- Our belief, on reasonable grounds that you have committed a serious credit infringement.

We may transfer or receive personal information to and from service providers (including affiliates acting in this capacity) that perform services for us, such as verifications, communications, billing, marketing, information technology and/or data hosting or processing. Some of these service providers may be located outside of Canada, including in the Bahamas. While outside of Canada, personal information will be subject to applicable local laws, which may permit personal information to be accessed by government or national security authorities in certain circumstances. More precisely, Floria is using, without limitation, the following service providers:

- *Spectrum Business Consulting and Property Management Ltd.* (“Spectrum”). We use them as our service provider to perform day-to-day operational tasks, verifications and for Canadian bank accounts in which funds will be disbursed and collected in. You expressly consent to us providing your personal information to Spectrum.
- *Plaid Inc.* (“Plaid”). We use their services as a banking data aggregator, which is directly integrated into our Website. By using our services and the Website, you acknowledge and agree that your personal information, including your name, banking details (including account numbers) and other payment information, will be transferred and made available to Plaid and that the terms and conditions of Plaid’s privacy policy (available here: <https://plaid.com/legal/#privacy-policy>) will govern Plaid’s use of such information. You hereby expressly agree to the terms and conditions of Plaid’s privacy policy and you grant Plaid the right, power and authority to access and transmit your information (to us or to our service providers) as reasonably necessary for Plaid, for us and for our service providers to provide the services you require by using our Website and services.
- *Bank of Montreal* (“BMO”). For payment processing, we use the services of Spectrum and Spectrum may use the services of BMO. Floria does not directly contract with BMO. You hereby expressly agree to grant Spectrum and BMO the right, power and authority to access and transmit your information between them as reasonably necessary for BMO, for us and for our service providers to provide the services you require by using our Website and services.
- *DocuSign*. All documentation between Floria and applicants or customers will be signed through DocuSign, except the documentation that requires to be signed in front of a Notary under the applicable laws.
- *Google Analytics and Social Media*. Google Analytics is a web analytics service offered by Google that we use to track and report our Website traffic and to monitor the use of our service. Floria also operates Pages on Facebook and LinkedIn that collect your information through cookies; we refer you to their privacy policy for more details.

Floria will ensure that any partner and service providers with whom such personal information is shared is bound to Floria by a confidentiality agreement regarding the treatment of such personal information, which will be at least equivalent to the provisions of this Policy. You hereby expressly grant our service providers the right, power and

authority to access and transmit your information (to us or to other service providers) as reasonably necessary for them to provide and perform the services you required by using our Website and services.

8. Storage of Personal Information

The file containing your personal information will be maintained on our servers or those of our affiliates or service providers, and will be accessible by authorized employees and representatives. We take reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access, modification or disclosure. Unfortunately, no data transmission over the internet can be guaranteed as totally secure and Floria provides no guarantee of whatsoever to that effect.

We may, at any time, sell, transfer or assign any or all of our rights to our affiliates and subsidiaries, including our interests, rights or obligations regarding your account(s) with us. If we do so, we may share your personal information with prospective purchasers, transferees or assignees.

Your personal information may be stored and processed at our corporate offices in the Bahamas or with approved third parties within Canada or elsewhere.

9. Consent

By accessing our Website, applying for a loan, signing into your account, communicating with us or providing personal information to us in any way, you acknowledge your consent for personal information collection, use and disclosure as set out in this Policy, applicable laws and industry standards.

If we want to use your information for a purpose that was not disclosed at the time of initial consent, consent will be sought at the time of this new purpose. Consent to the collection, use and disclosure of personal information may be given in various ways. Consent can be express or implied. In some circumstances, where notice has been provided to you about our intentions with respect to your personal information and you have not withdrawn consent, you will be considered to have consented for the purposes identified and described to you. By submitting personal information to Floria or its service providers and agents, you consent to the collection, use and disclosure of such personal information as described in this Policy or otherwise at the time of collection. If you provide Floria or our service providers and agents with personal information of another individual, it is your responsibility to obtain consent from such person to enable us to collect, use and disclose such information for the purposes set forth in this Policy.

In certain circumstances, as permitted or required by law, we may collect, use or disclose personal information without your knowledge or consent. These circumstances include but are not limited to: personal information that is publicly available as defined by regulation; where collection is clearly in your interests and consent cannot be obtained in a timely way; where disclosure is made for the purposes of collecting a debt owed to us; or to comply with applicable laws.

Subject to legal and contractual restrictions, you can, with reasonable notice to Floria withdraw your consent for use and disclosure of your personal information, other than that which is required for us to maintain your account and to provide services for which you

were approved. You can also request that we do not contact you for advertising, marketing, promotions, rewards programs, research or contests, by updating your privacy preferences. You should know that withdrawing your consent in these instances may result in you missing out on offers specific to your account.

To update your privacy preferences, please consult our Website through the following links:

- Website's link to update privacy preferences: <https://floriacapital.com/files/privacy-policy-en.pdf>
- To opt out of Floria's email marketing list only, visit our email opt-out site : <https://floriacapital.com/contact-us>
- You must opt out of the use of cookies separately. You can adjust your browser to reject cookies by managing your cookies settings on our Website at the following link : <https://floriacapital.com/contact-us>

10. Safeguards

Floria uses procedures and practices appropriate to the sensitivity of personal information to protect against loss, theft and unauthorized access. Only authorized employees, service providers, agents, partners and third parties who require access to personal information to fulfill their job requirements will have access to personal information. For example, we have physical security (such as restricted access to our offices and secure storage), electronic protection (such as passwords and encryption) and safe business practices.

While Floria takes all reasonable measures to protect data, there is always inherent risk when providing personal information. You can help us safeguard your information too. If you contact us through email or social media, you should avoid sending highly sensitive information, such as your banking information. If someone representing Floria contacts you and requests your personal or financial information, and you are suspicious, you can always contact us to confirm that the request was legitimate. We also recommend that you use unique and strong passwords for your online account and that you do not share your passwords with anyone.

11. Right of Access and Correction

You may request access to the personal information we hold about you and to update and/or correct it, subject to certain exceptions permitted by law. If you wish to access your personal information, please contact us in writing (see the Contact Section of this Policy). We will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your personal information. In order to protect your personal information we may require identification from you before releasing the requested information.

If you successfully demonstrate the inaccuracy or incompleteness of personal information, we will amend the information as required. You will be solely responsible for any inaccurate information you provide to us. If we refuse access to personal information or disagree with an assertion that information held by us is incorrect, we will provide a written explanation for such refusal and a description of our complaints procedure should you decide to challenge such written explanation.

12. Contact

For more information regarding the Policy, or for any other inquiry or question, you may contact us or our Service Provider by phone, email, by mail or through our Website.

Floria Capital Ltd.

By Phone: +1 (647) 715-5300

By Email: support@floriacapital.com

By Mail: CUB Financial Center, Western Road, Nassau, The Bahamas

Section of the Website: <https://floriacapital.com/contact-us>

Spectrum: Service Provider in Quebec

By Phone: (514) 507-2500 ext. 3

By Email: nfawaz@spectrumconsult.com

By Mail: 2075 boul. Robert Bourassa, Montreal, QC H3A 2L1

Section of the Website: <https://floriacapital.com/contact-us>

This Policy is governed by the laws of the Province of Quebec, Canada and applicable laws of Canada. Please note that both English and French versions of this Policy have equal legal value.