

## **Privacy Policy**

Please read carefully the following terms of this Privacy Policy. If you do not agree with these terms, you should not use the Website and you will not have access the Portal. Your electronic acceptance of this Privacy Policy is the same as delivering to us a valid, written paper agreement accepting the terms of this Privacy Policy.

### **Our Commitment to Privacy**

We are committed to protecting your privacy and the confidentiality of your personal information. The collection and use of personal information is fundamental to our business of providing Services to users of our Website and Portal. That includes treating your personal information fairly and with care. This Privacy Policy sets out our personal information practices, including how the information is used and with whom the information is shared.

### **Interpretation**

In this Privacy Policy,

“business day” means any day, other than a Saturday, Sunday or public holiday, on which banks are open for business in Toronto, Ontario;

“Portal” means [www.pinchfinancial.com](http://www.pinchfinancial.com) which is accessed by your login information, through the Website;

“Services” means the services provided by us through the Website and the Portal, which include (i) an online platform for users to obtain information about and compare the financial products of third party providers, including mortgage and insurance rates, through a concealed providers list, and (ii) the ability for users to request to be referred to a third party provider of financial products to apply for a financial product;

“Website” means our website located at the following URL: [www.pinchfinancial.com](http://www.pinchfinancial.com)

“we”, “us” and “our” means Pinch Financial Inc.; and

“you”, “your” and “user” refer to the person who accesses the Website or the Portal.

### **What is Personal Information?**

Personal Information is information that is specific to you and includes your name, address, telephone number, email address, and information about how you intend to use the Services. Personal information may also include whether or not a financial services product(s) is extended to you, the status of your referral to, or any application to, third party provider of financial products, your transaction history in using our Services and the way in which you use our Services.

### **Accountability**

We take our commitment to securing your privacy very seriously. Our employees and representatives are informed about the importance of privacy and receive information periodically to update them about our Privacy Policy and related security procedures. Each of our employees and representatives is responsible for the personal information under his or her control.

### **Your Consent and Why We Collect, Use and Disclose Your Personal Information**

We accept any of the following as your consent to our existing and future collection, use and disclosure of your personal information for the purposes identified in this Privacy Policy or in any document or other terms in which you expressly give your consent:

- your consent obtained through the sign up process for the Portal; or
- your use of the Website or Portal.

There are a number of reasons why we collect, use and disclose personal information. We will obtain most of the information about you directly from you. Additional information may be obtained from third party providers of financial products. Your consent is required before we may collect, use or disclose your personal information, except in special circumstances, such as in legal and security situations.

When you use our Services, you agree that we may collect personal information from you and about you, and use it, and disclose it to any person or organization for the following purposes:

- to determine the suitability of our Services;
- to refer you to a third party provider of financial products to apply for a financial product;
- to understand your financial needs and determine which Services may be of use to you to help meet your needs;
- to promote our Services, either directly by us or through third parties that we select to assist us with marketing or telemarketing;
- to promote the products and services of third party providers of financial products who we may have arrangements with from time to time, either directly by us or through third parties that we select to assist us with marketing or telemarketing;
- to administer and provide ongoing Services;
- to comply with legal requirements and regulations that we believe are applicable to us; and
- to respond to a court order, search warrant or other demand or request which we believe to be valid.

We do not provide directly all the services required to provide the Services related to your relationship with us. We may use third party service providers to process or handle personal information on our behalf and to assist us with various services such as accounting, software and processing services, electronic and physical storage services, printing, mail and electronic mail distribution and marketing (including by telephone and electronic means), and you acknowledge that we may release information about you to them. Some of our service providers are or may be located outside of Canada. As a result, your personal information may be accessible to regulatory authorities in accordance with the laws of these jurisdictions. When personal information is provided to our service providers, we will require them to protect the information in a manner that is consistent with this Privacy Policy and our security procedures.

When you request a referral to a third party provider of financial products to apply for any financial product, you consent and agree that we may use, give to, obtain, verify, share and exchange information about you with such third parties. We may do this throughout the relationship we have with you. You acknowledge that while we will not charge you any referral fees, other charges or commissions for your use of the Website or the Portal or for any referral to a third party provider of financial products, we may receive referral fees from such third party providers of financial products, which fees may be dependent on the status of such referral and whether you ultimately receive a financial product from such third party provider. You consent to such third party provider providing us with such information about you as is necessary for us to determine the status of your referral and if you ultimately received a financial product.

We will not sell, rent or barter your personal information other than to third party providers of financial products as set forth herein. However, we may from time to time aggregate statistical information regarding our users, traffic patterns and Website or Portal usage, and sell our research, which may contain aggregate information. In addition, we may report aggregate information to our advertisers. Such aggregate information will not individually identify any user.

If we sell our company or a portion of our business, you consent and agree that we may release the information we hold about you to the prospective purchaser. We will require any prospective purchaser to protect the information provided and to use it in a manner that is consistent with this Privacy Policy and our security procedures.

You consent and agree that we may monitor, record, and retain any telephone call or electronic communication we have with you. This is to establish a record of the information you provide, to ensure that your instructions are followed properly and to ensure service levels are maintained. Records of calls and electronic communications are destroyed when they are no longer required for business or other purposes, and any personal information is safeguarded in accordance with our security procedures.

A "cookie" is a piece of data that a web server creates when you visit a website. This data is information about how and when you use a website. It is placed on your computer, smartphone, smart TV or tablet in the form of a small text file. Cookies are used by us to track content usage and traffic on the Website. The Website uses cookies to help it compile aggregate statistics about usage of the Website, such as how many users visit the Website, how long users spend viewing the Website, what pages are viewed most often, and what pages users may visit directly after leaving the Website. This information is used to improve the content of the Website and to provide and improve the Services. You can limit the

collection of your information by disabling cookies on your web browser. You may also be able to modify your web browser settings to require your permission each time a site attempts to set a cookie. However, if you disable cookies, you may not be able to take advantage of all the features of the Website.

Your IP address is reported by your web browser whenever you visit a page on the Website. This information is recorded together with your registration information on our databases.

Our Website may contain links to other websites, including the websites of third party advertisers. We are not responsible for the practices of those third party websites. Where you access other websites from our Website using the links provided, the operators of those websites may use cookies and collect your personal information in accordance with their own policies, which may differ from ours. You should read their privacy and cookie policies carefully before you provide any personal information to them.

### **Refusing or Withdrawing Consent**

Subject to legal, regulatory and contractual requirements and the terms of this Privacy Policy, you can refuse to consent to our collection, use or disclosure of information about you, or you may withdraw your consent to our further collection, use or disclosure of your information at any time in the future by giving us reasonable notice. However, depending on the circumstances, withdrawal of your consent may prevent us from providing you, or continuing to provide you, with some Services or information that may be of value to you. We will act on your instructions as quickly as possible but there may be certain uses of your information that we may not be able to stop immediately.

You may not withdraw your consent to our ongoing collection, use and disclosure of information required by third party service providers essential for the provision of the Services.

You may not withdraw your consent to our ongoing collection, use or disclosure of your personal information in connection with any referral you have requested to a third party provider of financial products.

You can tell us at any time to stop using information about you to promote our Services or the products and services of third party providers of financial products who we may have arrangements with.

If you wish to refuse consent or to withdraw your consent, please contact us at the e-mail address or mailing address listed below.

### **Limiting Collection, Use, Disclosure and Retention of Information**

The personal information about you which we collect will be limited to that which is necessary for the purposes we identified to you. Information will be collected by us only by fair and lawful means.

We will not collect, use or disclose your personal information for purposes other than those identified to you in this Privacy Policy for which your consent was given. We will seek your further consent before using your information for purposes beyond the scope of your original consent.

We will retain your information only for the time it is required for the identified purposes and for a reasonable length of time thereafter in case we need to meet any potential obligations or legal or government requirements. Once your personal information is no longer required, it will be destroyed or made anonymous.

### **Keeping Your Information Accurate**

We strive to maintain accurate, complete and relevant personal information. We rely on you to provide us with accurate information and to inform us of any changes so we may update our records.

### **Safeguarding your Information**

We will protect your information, whether in electronic or paper based format, with commercially reasonable safeguards and security measures, to protect it from unauthorized access, disclosure or misuse. We review our security procedures regularly to ensure that they are being properly administered and that they remain effective and appropriate. However, we cannot guarantee that our Website or Portal or any physical or electronic storage mechanisms we use will not be the subject of unauthorized access or intrusion.

### **Providing Access to Your Information**

We will give you access to the information we retain about you when you request it and satisfactorily identify yourself. Upon request, where permitted by law, we will tell you what personal information we have, what it is being used for, from whom it was collected and to whom it has been disclosed (except where such disclosure was to a service provider for routine purposes). We will do so within a reasonable period of time and a nominal fee for processing your request may apply.

We may not provide access to personal information within our possession or control if it:

- contains references to other individuals
- doing so may reasonably be expected to threaten the security of another individual;
- would reveal confidential commercial or proprietary information;
- is subject to solicitor-client or litigation privilege; or
- cannot be disclosed for any other legal reasons.

If we deny your request for access to your personal information, we will advise you in writing of the reason for the refusal.

### **Amendments**

You acknowledge that we may amend this Privacy Policy from time to time to take into consideration changes in legislation, technology or other issues that may arise. We will post the revised Privacy Policy on the Website and Portal and make it available at our address below or we may also send it to you by electronic means.

Your continued use of any Service following such change means that you agree to and accept the new terms and conditions of the Privacy Policy as amended. If you do not agree with any of the changes made or with the new terms of the Privacy Policy, you must immediately stop using the Service and notify us that you are terminating your Service(s) with us.

### **Respecting and Responding to your Privacy Concerns**

Our Privacy Policy is made available to the public in paper form at our address below, and in electronic form at the Website and Portal. If you have any questions or concerns regarding your privacy or this Privacy Policy, you should direct them to us at the mailing address or e-mail address provided below.

Attention: Pinch Financial Inc.

Address:

Sixth Floor

10 Dundas Street E.  
Toronto, Ontario M5B 0A1

E-mail Address:

info@pinchfinancial.com

Please be sure to include your name, address, preferred method of communication, the nature of your inquiry or complaint and relevant details, including your past communications with us. If you have a complaint and it is justified, we will take the steps necessary to resolve the issue, including, if necessary, amending our Privacy Policy and security procedures.