

PRIVACY POLICY

ACCOUNTABILITY

Yield Exchange Inc. (“YEI”) is serious about providing you with the highest levels of customer service so we understand how important it is to protect your personal information.

The *Personal Information Protection Act* (British Columbia) (PIPA) sets out rules for how organizations collect, use and disclose personal information. “Personal information” is a broadly defined term that includes information that is reasonably capable of identifying a particular individual either alone or when combined with information from other available sources. Personal information does not include business contact information (such as an individual’s name, business title, business address, and business phone number).

This Privacy Policy sets out the principles that will be observed by YEI with respect to the collection, use, and disclosure of personal information when you use the services provided through the Yield Exchange online platform located at yieldexchange.ca (“Services”).

YEI provides the Services to business entities and organizations only. As such, the type of information primarily collected by YEI is business information. This Privacy Policy does not apply to business information, however YEI also exercises care and diligence in protecting the confidentiality of such business information.

Although YEI primarily collects business information, YEI may also collect personal information about individuals involved in the business entity or organization, such as directors and signing officers. YEI will request only the minimum amount of personal information required for the purpose it is collected.

YEI is committed to being accountable for how it handles personal information, as well as how it follows the principles set out in this Privacy Policy.

IDENTIFYING PURPOSES & LIMITING COLLECTION

The types of personal information YEI collects include:

- Identification information: such as name, ID card (such as driver’s license or passport), date of birth, gender, citizenship status
- Contact information: such as phone numbers, address, email address
- Interactions and preferences information: such as data which relates to your use of the Services, data from your interactions with us and our website

YEI collects information about how you use our website. Even though this information is not linked to your identity, it can be in certain circumstances by using cookies. This is why YEI considers this data to be personal information as well when linked to your identity. The data YEI collects includes:

- third party demographic and navigation data;
- other information from your interaction with our website, such as the webpages you access, your IP address, the web browser used; your network and geo location, web log.

YEI may collect, use and disclose personal information in order to:

- verify your identity;
- establish and maintain a user account on our website;
- provide the Services;
- introduce you to financial institutions that participate in the Yield Exchange platform and to facilitate the establishment of a business relationship with such financial institutions;
- ensure a high standard of service to you;
- communicate with you;
- manage our relationship with you and our service providers;
- promote our products and services to you;
- meet regulatory requirements;
- answer queries and assist with issues;
- obtain legal advice from a lawyer;
- bring or defend against legal proceedings;
- investigate complaints, fulfill access to information requests and to respond to privacy breaches;
- develop new internal tools and content, products or service features;
- protect you and us against errors and fraud;
- analyze how you use our website and improve your experience;
- periodically obtain opinions or comments about our website, Services, or our providers.

CONSENT

By submitting personal information to YEI when registering for a user account or when accessing and using the Services, you consent to our collection, use and disclosure of such personal information in accordance with this Privacy Policy and as permitted or required by law.

If you provide YEI with personal information of another individual, you represent that you have all necessary authority and/or have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set out in this Privacy Policy.



An individual may withdraw their consent to the collection, use and disclosure of their personal information at any time, subject to legal or contractual restrictions. A decision to withhold or withdraw certain personal information may restrict YEI's ability to provide or continue to provide Services.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect personal information:

- directly from you when you provide information in registration or application forms or otherwise when you submit your personal details to us through our website;
- when you visit our website, we collect information sent by your access device whether computer, mobile phone or other platforms;
- directly from you when you have other dealings with us;
- from publicly available sources of information, such as corporate registries and databases.

LIMITING USE AND DISCLOSURE

Personal information will be used or disclosed for the purpose for which it was collected, as described above, or as authorized or required by law. YEI will not use or disclose personal information for any other purposes unless YEI obtains your consent to do so.

YEI may disclose personal information to financial institutions participating in the Yield Exchange platform in order to introduce you the financial institution and to facilitate the establishment of a business relationship with the financial institution. YEI will share with such financial institutions only the personal information required for the financial institution to contact you, to verify your identity and establish a business relationship with you. YEI requires such financial institutions to provide a comparable level of protection to personal information and other confidential information disclosed to it by YEI. The financial institution will have its own privacy policy that will apply to its collection, use and disclosure of personal information.

YEI will not sell your personal information to third parties.

Our service providers may need to access or process your personal information. We will take all reasonable steps to satisfy ourselves before permitting access to any of your personal information that the service provider is committed to providing a comparable level of protection to your personal information.

If YEI is involved in a sale, transfer or reorganization of its business that involves the disclosure of personal information to another organization, YEI will require that organization to protect the personal information in a manner that is consistent with this Policy and applicable law.

RETENTION

YEI retains personal information as long as is necessary for legal or business purposes. Personal information that has been used to make a decision that directly affects an individual will be retained for at least one year. We take reasonable steps to securely destroy or anonymize personal information when it is no longer required for legal or business purposes.

ACCURACY

It is important to us that the personal information we hold about you is correct and up to date. We will generally rely on you to make sure the information we hold about you is correct and complete.

If personal information we hold about you is incorrect or incomplete, please contact us to request that we revise it. If we are satisfied that the request for correction is reasonable, we will correct the information and send the corrected information to financial institutions and other organizations we disclosed that information to during the year before the date the correction was made or as required or permitted by law. If we are not satisfied that the request for correction is reasonable, we will annotate the information, noting the correction that was requested but not made.

Certain information in your Yield Exchange user account profile can be reviewed and updated through your Yield Exchange user account.

SAFEGUARDS

YEI understands the importance of using security safeguards to protect personal information against loss, theft, unauthorized access, disclosure, copying, use, modification or disposal. YEI employs physical, administrative and technological measures to protect personal information regardless of the format in which it is held and in accordance with the sensitivity of the information.

We may use servers located in Canada, paper-based files or other methods to store the personal information we hold.

YEI is committed to ensuring that appropriate security measures are employed in the transfer of personal information. YEI recommends that you do not transmit personal information by unencrypted e-mail or wireless devices. Email and wireless communications are not always secure and personal information may be intercepted. Open access or unprotected WiFi creates a risk of interception and may allow others to impersonate you.

YEI is not responsible for the security of personal information you send to or receive from us over the internet, or for any unauthorised access or use of that information.

You are responsible for all actions taken through your user account on our website, so if you lose control of or if your password has been compromised for any reason, you should immediately change your password and notify us.

INDIVIDUAL ACCESS

At any time, with sufficient information, an individual may seek access to their personal information. Individuals may be required to prove their identity before YEI will provide access to the personal information. In some cases, YEI may respond to a request with an estimate of the fee required for processing the request. Individuals may be requested to pay all or part of the fee in advance of the processing of the request.

Except where otherwise permitted or required by law to deny access, YEI will provide individuals with access to their personal information within 30 days and will include, as accurately as possible, an account of the third parties to whom YEI has disclosed the individual's personal information.

If YEI is authorized or required by law to refuse access, YEI will tell the applicant in writing, stating the reasons for the refusal and outlining further steps that are available to the applicant.

LINKS - THIRD PARTIES

YEI's website may contain links to other websites which are provided as a convenience only. Other third party websites may have different privacy policies and practices than YEI, and YEI has no responsibility for such third party websites

YEI'S USE OF COOKIES

YEI employs the use of cookies. A cookie is a small piece of data that is sent from our web server to your browser when you visit our website, which is saved on the hard drive of your computer. A cookie cannot read data off your hard disk or read cookie files created by other sites, and it will not damage your system. A cookie identifies the visitor's browser, but not necessarily the visitor, each time our website is visited. Unless a visitor specifically informs us (e.g. by registering for a user account or otherwise sending us correspondence from the website), we will not know who the individual visitors are.

We use general cookies from Google Analytics to identify which pages are being used. This helps us study data about web page traffic and improve our website to tailor it to customer needs. We use this information for statistical analysis purposes only and then the data is removed from the system.

We also use Google cookies for remarketing to advertise online as follows:

- When you visit our website, our web server will drop a cookie on your browser.
- If you leave our website to visit another website which is part of the Google network, you may be served our ad.
- The remarketing cookie will be valid for 30 days.
- You can remove our remarketing cookie by deleting your Internet browsing history and clearing your cookies. This can be done through the tools/settings function of your Internet browser.

Overall, cookies help us provide you with a better website by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

The information gathered through the use of cookies is not shared with third parties. You may turn off your cookies by adjusting the appropriate settings on your browser. Please consult the “Help” menu of your browser to learn how to adjust or turn your cookies off. Cookies do not reveal personal information and if you turn off your cookies you may find your enjoyment and ease of use of our website to be reduced or impaired.

DIRECT MARKETING

From time to time, we will introduce new products and services. However, we respect your privacy and understand that not everyone wants to be contacted regarding sales and marketing. We may conduct marketing activities via email, telephone, SMS, mail, or any other electronic means.

We may also market our products to you through third party channels (such as social networking sites). If you do not wish to receive marketing information, you may at any time decline to receive such information by writing to privacy@yieldexchange.ca. If the direct marketing is by email you may also use the unsubscribe function and will take all reasonable steps to meet your request at the earliest possible opportunity. For example, you can unsubscribe to e-newsletters sent by us.

We will not use or disclose sensitive information about you for direct marketing purposes unless you have consented to that kind of use or disclosure.

FURTHER INFORMATION AND COMPLAINTS

If you have any questions, concerns or complaints about how we handle your personal information under this Privacy Policy, we want to hear from you. You are always welcome to contact YEI's privacy officer at privacy@yieldexchange.ca.

We will take reasonable steps to remedy any issues resulting from our failure to comply with our privacy obligations. If you are not satisfied by our response, you may contact the [Office of the Information and Privacy Commissioner for British Columbia](#).

CHANGES TO THIS POLICY

We are constantly reviewing our privacy practices and attempt to keep up to date with market expectations. Technology, legal requirements, and business practices are constantly changing. As such, we may make changes to this Privacy Policy from time to time. Changes will be posted on our website.