

# 1505333 B.C. LTD Privacy Policy

**Effective Date: 01 October 2025**

This Privacy Policy outlines how **1505333 B.C. LTD**, ("the Company"), collects, processes, shares, retains, and uses personal data. As a **FINTRAC-registered and regulated Canadian Money Services Business (MSB)**, 1505333 B.C. LTD acts as the data controller for individuals and business users engaging with its services, including all online platforms and mobile applications ("Platforms" and "Applications").

By accessing our Platforms, Applications, or accepting terms during registration, you ("the user") agree to the practices described in this Privacy Policy. We are committed to protecting your privacy and complying with **Canadian privacy legislation**, particularly the **Personal Information Protection and Electronic Documents Act (PIPEDA)** and relevant provincial laws.

## Information We Collect

To ensure secure and efficient service delivery, 1505333 B.C. LTD collects various types of personal and business data. This occurs during registration, onboarding, service delivery, and usage of our Platforms or Applications.

Personal data includes, but is not limited to:

### ● Identification and Contact Information

Name, email, phone number, and business contact details. Used to verify identity and maintain effective communication.

### ● Corporate and Compliance Data

Documents and information for **Know Your Business (KYB)** and **Anti-Money Laundering (AML)** purposes, including business registration, ownership structure, and beneficial ownership details.

### ● Technical and Access Data

IP addresses, device type, browser, login records, and location data, used to detect suspicious activity and secure access.

## ● Behavioural Data

Browsing activity and platform interaction metrics to improve user experience and service optimization.

## Purpose of Data Collection

We collect and process personal data for the following lawful purposes:

### ● Regulatory Compliance

To meet obligations under the **Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA)** and other regulations administered by **FINTRAC**. This includes due diligence, reporting, and maintaining audit records.

### ● Service Delivery

To provide requested services such as international remittance, crypto payouts, and currency exchange in a secure and seamless manner.

### ● Contract Fulfillment

To manage client relationships, fulfill contracts, and provide continuous access to our Platforms and Applications.

### ● Security and Risk Management

To assess financial crime risk, detect fraud, and enhance data protection.

### ● Analytics and Improvements

To analyse service performance, understand user preferences, and develop enhancements for functionality and experience.

### ● Marketing (with Consent)

With your explicit consent, we may send updates and offers related to our services. You may opt out of these communications at any time.

## Disclosure of Information

We may disclose personal data to:

- **Regulatory authorities (e.g., FINTRAC, CRA)** to comply with lawful obligations.
- **Technology and compliance partners** who provide services such as ID verification, transaction processing, or analytics.
- **Law enforcement or courts**, when required by a subpoena, warrant, or court order.
- **Entities outside Canada**, with appropriate safeguards such as **data transfer agreements** or adherence to recognized privacy frameworks.

## User Rights Under Canadian Law

As a user, you have the following rights under **PIPEDA**:

- **Right to Access:** You may request a copy of the personal data we hold about you.
- **Right to Rectification:** You may request corrections to inaccurate or outdated data.
- **Right to Withdraw Consent:** You may withdraw marketing consent or object to processing (where applicable).
- **Right to File a Complaint:** If your privacy rights have been violated, you may contact the **Office of the Privacy Commissioner of Canada (OPC)**.

To exercise your rights, please contact our **Privacy Officer** at:  
support@besttransfer.com

## Data Retention

We retain client data for **a minimum of five (5) years** as required by **FINTRAC** regulations, and longer where necessary for legal or operational purposes. Data is securely deleted or anonymized after the retention period.

## Data Security

We use robust security systems to protect personal data, including:

- **End-to-end encryption (SSL/TLS)**
- **Firewalls and intrusion detection systems**
- **Multi-factor authentication**
- **Access controls and staff training**

Regular audits and vulnerability assessments are conducted to mitigate risk.

## Policy Updates

This Privacy Policy is reviewed and updated periodically. Any material changes will be communicated via email or through our Platform.

## Contact Information

### **Data Controller:**

**1505333 B.C. LTD**

FINTRAC MSB Registration #: C100000589

British Columbia, Canada

support@besttransfer.com

If you believe your privacy rights have been violated, contact the **Office of the Privacy Commissioner of Canada (OPC):**

☎ 1-800-282-1376

<https://www.priv.gc.ca>