

Privacy Policy

JYBE FINANCIAL INC.

At Jybe Financial Inc. ("Jybe", "we", "us", "our"), we are committed to safeguarding the accuracy, confidentiality, and security of your personal information. This Privacy Policy outlines how Jybe collects, uses, and discloses personal information from or about you through our website: www.jybe.ca mobile application, services, and other means described in this Privacy Policy (collectively, the "Services"). By accessing or using our Services, you indicate your acceptance of this Privacy Policy and agree to be bound by its terms. However, you have the option to withdraw your consent at any time; please note that doing so may limit your access to or use of the Services. By voluntarily providing us with your personal information, you consent to its collection, use, and disclosure as described in this Privacy Policy.

1. How and Why Jybe Collects Personal Information.

1.1. What is Personal Information? For the purpose of this Privacy Policy, personal information refers to any information about an identifiable individual.

1.2. The Personal Information that We Collect Directly. We collect and maintain various types of personal information about individuals with whom we interact. Before granting access to the Services, we may request certain personal information from you. For example, we collect information when you create an account, use our Services, participate in promotions or programs, contact us, or provide personal information for any other purpose. The types of personal information we may collect include: (a) contact and identification information, such as your name, address, telephone number, email address, social insurance number (optional), third-party application IDs, and similar contact details; (b) financial information, such as bank account numbers, credit scores, credit and debit card information, checking account details, and other financial or payment information; (c) demographic and location information, including your age, date of birth, and other relevant details; and (d) government IDs and identifying documents, such as utility bills, bank statements, credit card statements, loan statements (or mortgage documents), passport, permanent resident card, identification card, BC services card (for British Columbia residents), answers to knowledge-based authentication questions, cell phone number, and information about your wireless service provider. We may also gather information about your interactions with us, such as customer support communications and survey responses.

1.3. Information that Jybe Receives from Your Use of the Services. When you visit or use our Services, we may collect information related to your activities and interactions with our Services. This includes information sent to us by your computer, mobile phone, or other devices, such as your IP address, unique device identifiers, device name and type, operating system, location, mobile network information, and standard web log information. We may also collect information about your device settings, browser type and version, application IDs, crash data, traffic data to and from our website, pages accessed on our website, and other available information. Furthermore, we may store information based on your usage history, including purchase details, viewed content, event information, and clickstream data. We use various technologies like cookies, web beacons, and anonymous identifiers to collect and analyze this information.

1.4. Cookies and Anonymous Identifiers. To better understand your use of our website and to customize and improve our services, we may place a "cookie" on your computer's hard drive. A cookie is a small data file that can only be read by the website that placed it on your hard drive. It acts as an identification card, allowing us to identify you and remember your preferences, actions, and passwords related to our website. Most web browsers are set to accept cookies, but you can modify this setting to receive notifications before accepting cookies or to automatically prevent their placement. However, note that refusing cookies may limit your access to the Services.

We may also utilize the Facebook pixel, a JavaScript code, to track whether you have visited our website through a Facebook advertisement. This information helps us tailor our marketing and improve ad targeting. Facebook also places a cookie on our website to collect certain information, which is then used in an anonymized, hashed form to assist us in creating targeted audiences for future ads and retargeting our Services to you based on your browsing history.

1.5. Call Recordings. For quality assurance and training purposes, we record phone calls made or received through our customer help line. You will be notified of our intent to record the call before any substantive discussion begins, and if you choose not to consent to this recording, we will provide an alternative means of communication. You have the right to obtain a copy of these recordings.

Consent to record your phone calls is not required if (1) we call you for debt collection purposes, (2) the call is for investigating potential fraud, or (3) your knowledge of the recording could hinder our ability to obtain accurate information.

1.6. Information Obtained from Third Parties. You may grant us access to certain personal information stored by third parties, such as social media sites. The information we receive from these sites depends on your privacy settings and authorizations on those platforms. By associating a third-party account with your Jybe account and authorizing us to access this information, you agree that we may collect, store, and use this information in accordance with this Privacy Policy.

We may also obtain personal information from third-party service providers, such as merchants, credit bureaus, and identity verification services. These third parties may provide personal information collected while providing services to us or in the course of their duties. We take reasonable steps to ensure that such third parties have the right to disclose your personal information to us.

Furthermore, if you have authorized your wireless carrier to share information with us about your account (e.g., name, address, payment method, device details), we may receive this information for identity verification, fraud prevention, and support purposes. We may also share this information with our service providers as necessary for these purposes.

1.7. Why do we Collect Personal Information? We collect only the necessary information from you to provide products and services available through the Services and manage, maintain, and improve our operations. For example, we collect information to:

- Establish, maintain, and manage our relationship with you to provide or receive requested products or services.

- Enable you to register, access, and maintain an account with us.
- Facilitate your participation in our programs, subscriptions, or receiving products or services.
- Understand your preferences and improve our products and services based on your requirements.
- Comply with your preferences and contact you using your preferred methods.
- Conduct research and create analytical data related to our business, services, promotions, and operations.
- Enhance the customer experience by customizing offers, products, and services based on your preferences.
- Send you information about promotions, products, or services that we believe may interest you.
- Protect Jybe against error, fraud, theft, and damage to our goods and property and investigate, detect, prevent, or take action against illegal or prohibited activities and suspected fraud or potential threats to anyone's reputation or physical safety.
- Comply with applicable laws, regulatory processes, and legal requirements.

We also use your personal information for research and development, ensuring any analysis or reports are de-identified and aggregated to maintain your privacy. We may also retain de-identified and/or aggregated information and use it for various purposes without restrictions.

We will retain your personal information only as long as necessary for the purposes for which it was collected, subject to legal requirements.

1.8 Safety and Security Policies. Jybe maintains physical, electronic, and procedural safeguards to store and process your personal information securely. We implement physical security measures to prevent unauthorized access and utilize safeguards like firewalls and data encryption. Access to personal information is granted only to employees or agents who require it for their job responsibilities and in accordance with this Privacy Policy.

The security of your personal information is a priority for us, and we have security management protocols to ensure its adequate protection. If you experience any incident involving loss, unauthorized access, or disclosure of personal information under our custody or control, please inform our Privacy Officer immediately.

2. When Jybe Shares Your Personal Information.

2.1 Our General Business Purposes. We may share your personal information with employees, affiliates, vendors, partners, merchant partners, marketing providers, and other third parties who require this information to assist us in managing our relationship with you. This includes third-

party service providers engaged in processing transactions, data storage and processing, identity verification, account maintenance, marketing, advertising, responding to legal orders or investigations, audits, and credit bureau reporting. Additionally, we may disclose your personal information as permitted or required by applicable laws, regulatory requirements, or when you consent to such disclosure. We may also share your personal information with our financial, insurance, legal, accounting, or other advisors who provide professional services to us.

2.2 With Credit Bureaus and Other Service Providers. We may share your personal information with credit bureaus, wireless carriers, and other third-party service providers as necessary to support your use of Jybe's products and services. We use contractual or reasonable means to protect your personal information and ensure it is used and disclosed according to this Privacy Policy.

2.3 Other Ways Your Personal Information May Be Disclosed. Your personal information may be disclosed as required or permitted by applicable laws or regulatory requirements, to comply with valid legal processes (e.g., search warrants, subpoenas, or court orders), for regular reporting under applicable laws, with national security or law enforcement agencies in relevant countries, and with your consent.

3. Your Rights and Options Regarding Your Personal Information.

3.1 Your Consent is Important to Us. We collect, use, and disclose your personal information with your consent, either implied or express, depending on the sensitivity of the information. We may collect, use, or disclose your personal information without your knowledge or consent as permitted or required by applicable laws or regulatory requirements.

We typically seek your consent when we collect your personal information. If we plan to use or disclose your personal information for purposes not previously identified, we will inform you of this before doing so. You can change or withdraw your consent at any time, subject to legal or contractual obligations and reasonable notice. Please contact our Privacy Officer to withdraw or vary your consent. Note that withdrawing or varying your consent may affect your access to certain services. By accessing our Services or using our products, you agree to the collection, use, and disclosure of your personal information as described in this Privacy Policy.

3.2 Notifications. You can manage your notification preferences and opt-out of receiving notifications about our Services by logging into your account or following the directions in the communications. However, opting out of certain notifications may impact your access to the Services. You may also exercise your opt-out rights directly with merchants.

3.3 Reviewing and Updating Your Personal Information. You can review, update, and correct your personal information by accessing your account through our website or by contacting our Customer Care team. We may require proof of your identity before providing access to your personal information.

3.4 Deactivating Your Account. You may request to deactivate your account by contacting our Customer Care team. Please note that deactivating your account may not delete your personal information from our records or databases and may not affect information that has been shared with third parties in accordance with this Privacy Policy.

3.5 Withdrawing Consent. If you wish to withdraw your consent for us to collect, use, or disclose your personal information, please contact our Privacy Officer. We will inform you of the likely consequences of withdrawing your consent, including any legal or contractual restrictions.

3.6 Data Retention. We retain your personal information only as long as necessary for the purposes for which it was collected, subject to legal requirements. Your personal information may be retained for a longer period if we have a legitimate business purpose or legal obligation to do so.

4. General Privacy Considerations.

4.1 Links to Other Websites. Our Services may contain links to other websites and third-party applications that have their own privacy policies. We are not responsible for the privacy practices or content of such websites or applications. We recommend that you review the privacy policies of these third-party websites and applications before providing them with your personal information.

4.2 Children's Privacy. Our Services are not intended for children under the age of 18, and we do not knowingly collect personal information from individuals under this age. If you are under 18, please do not provide us with any personal information or use our Services. If we become aware that we have collected personal information from a child under the age of 18, we will take appropriate steps to remove this information from our servers.

4.3 Changes to this Privacy Policy. We may update this Privacy Policy from time to time to reflect changes to our information practices. We will post the revised version on our website, and the effective date will be noted at the beginning of the Privacy Policy. We recommend that you review this Privacy Policy periodically to stay informed about how we collect, use, and disclose personal information.

4.4 Contact Information. If you have any questions or concerns about this Privacy Policy, our information practices, or your interactions with Jybe, please contact our Privacy Officer:

Privacy Officer Jybe Financial Inc. 93 Water Street St. John's NL A1C 1A5 Email: privacy@jybe.ca

Effective date: July 20, 2023