

## Privacy Statement

Meridian OneCap Credit Corporation’s (“MOCC”)<sup>1</sup> Privacy Statement applies to the collection, use, or sharing of any Personal Information<sup>2</sup> collected by MOCC while conducting its business (the “Privacy Statement”). It will continue to apply for so long as we may hold your information, including for a reasonable time after the termination of your relationship with us. The Privacy Statement has been designed to adhere to our obligations and applicable legislation relating to Personal Information. By providing us with your Personal Information, you are consenting to the collection, use or sharing of your information as outlined below.

MOCC is dedicated to protecting your privacy and your personal, business, and financial information. We carefully follow privacy best practices in everything we do, to support our commitment to you, including but not limited to, appointing a Privacy Officer to oversee our privacy program and practices.

### Personal Information Collection, Use and Disclosure

When you apply for, or open a product with us, and throughout the course of our relationship, we may collect, use, and disclose certain information obtained from or about you. This information may be collected from you directly, from your interactions with us, and/or from other sources outside our organization, by electronic, verbal, or written means. This information is collected and can be used to communicate with you, confirm your identity, satisfy legal or regulatory requirements, prevent fraud, support security, administer your account, provide products and services to you, manage the risks associated with our business as well as to collect on debts owed to us, or as otherwise required or permitted by law (all of which may be directly by us or through our third party service providers). For legal entities such as businesses, we may collect information from each authorized person, representative, or partner as needed. Some examples of the Personal Information we collect and how we may use or disclose it is outlined in the below table.

Personal Information	Examples	Use or disclosure
<b>Contact</b>	Name, address (legal and/ mailing), personal email address, telephone number	For communicating with you.
<b>Identification</b>	Date of birth, Government issued photo identification document	Establish and verify your identity to protect against fraud, satisfy applicable regulatory obligations, and/or is required or permitted by law for us to collect and retain.
<b>Financial</b>	Income, assets, liabilities, transaction history, payment history, credit history, account numbers, credit bureau check, Social Insurance Number	Evaluate and process your application, set up products/services with us, determine eligibility for a product/service either directly or through an affiliated service provider, partner, or third party.
<b>Communications</b>	Recordings of telephone calls, electronic communications, or copies of written instruction(s)	Establish a record of the information and/or instructions provided to you by us, and to support the quality of the services we provide.
<b>Video Recordings</b>	In and around our physical premises	Ensure your safety, and ours, and to prevent against fraud and/or other illegal activity, and maintain security.
<b>Other Information</b>	As required with your consent	To collect a debt owed to us, administer your accounts, or ensure your suitability and eligibility for products or services.

We strongly encourage you to read this entire document together with your account agreements as other means of collecting, using, and disclosing your Personal Information may be described within them.

### How we share your Personal Information

We may share your Personal Information:

- With our employees, agents, service providers, and any other entities that perform services on our behalf (collectively “service providers”). You acknowledge that some of our service providers may be located outside of Quebec and/or Canada and as such your Personal Information may be accessible to governmental, national security and regulatory authorities in accordance with the laws of their jurisdiction(s).
- With credit reporting organizations, such as credit bureau agencies.
- With other organizations or agents with whom you have arrangement and/or to whom you have provided express consent to directly.
- With our parent company, Meridian Credit Union, and its employees, agents, representatives, as well as third party service providers required to deliver services to you.
- With other financial institutions to process payments or to verify information such as your identity.
- In response to a court order, search warrant, or other demand or request(s) we believe to be valid.
- To meet requests for information from regulators.
- To satisfy legal, audit, insurance, self-regulatory, and regulatory requirements applicable to us.
- To other parties connected with your account, as applicable (i.e. co-lessees/codebtors, guarantors, powers of attorney).
- To help us collect a debt or enforce an obligation owed to us by you.
- With any person or organization, including an investigative body, to: Prevent, detect, or suppress financial abuse, fraud, criminal activity; protect our assets and interests; assist us with any internal or external investigation into potentially illegal or suspicious activity; or manage, defend, or settle any actual or potential loss.
- With your express consent to any other party.

We do not sell your Personal Information. We may use our contractors or third-party service providers to provide services on our behalf, such as data processing, account administration, analytics, and marketing. Such third parties will only receive the Personal Information required to perform those services and are not authorized to use or disclose this information for their own purposes without your consent. We also require such third parties to adhere to the applicable law and our internal standards to safeguard your information.

## Our Privacy Principles

We are committed to protecting your privacy and your right to control the collection, use, and disclosure of your Personal Information, whether it is under MOCC’s control, or information that has been transferred to a third party for processing.

- **Accountability:** We have appointed a Privacy Officer who is responsible for overall privacy governance and all employees are accountable for compliance to these principles. The contact information for our Privacy Officer can be found at the [Contact Us page on our website](#).
- **Identifying Purposes:** Before or at the time we ask you for Personal Information, including as set out in this Statement, we will identify the purposes for which it will be used or disclosed. We may ask for information about your identity, transactions, your application, financial behaviour, or other details particular to the product or service we provide you. If you have any questions about how your information will be used, you can ask at any time.
- **Consent:** We require your knowledge and express consent for the collection, use, or disclosure of Personal Information (except when specific legislative circumstances apply). We explain how your information will be used and with whom it will be shared, in a clear, and comprehensive manner. We will make it easy to withdraw your consent at any time, except when specific legislative circumstances apply. However, not providing certain information that we request may affect our ability to provide you with products and services requested or fulfill our commitments to you. We will not collect, use, or disclose your Personal Information without your consent, except where required by law. By using our products or services, you consent to the transfer of information to jurisdictions outside of Quebec and/or Canada — including but not limited to the United States — which may be subject to different data protection rules.
- **Limiting Collection:** We only collect information needed for the purposes we have identified, or the products and services you have requested, and we only collect information by fair and lawful means. We keep this information only for as long as it is needed for the purposes described above, even if you cease to do business with us.

- Limiting Use, Disclosure, and Retention:** Unless it is required by law, your Personal Information will only be used or disclosed for the purposes it was collected. We retain your documentation for the duration required: To provide products, services, or fulfill commitments to each other, as well as to fulfill our legal and regulatory requirements. This may require us to retain your information beyond the end of your relationship with us, however, we will securely dispose of your Personal Information when we are no longer required to retain it. You acknowledge that we may use third party service providers that operate outside of Quebec and/or Canada, and as a result, your information may be securely used, stored, or accessed and be subject to the laws of those jurisdictions. For example, information may be shared in response to valid demands or requests from government authorities, courts, and law enforcement officials in those countries. We will never sell your Personal Information to third parties.
- Accuracy:** MOCC will maintain your Personal Information as accurately, completely, and up-to-date as possible in order to properly satisfy the purposes for which it is to be used. You are responsible to advise MOCC of any inaccuracies or changes to your Personal Information. To ensure we have accurate information, we may also periodically request you review specific items of your Personal Information previously provided. If you believe the Personal Information we have retained about you is inaccurate, you may request that we review and correct any errors.
- Safeguards:** We will protect your Personal Information with appropriate physical, technological, and organizational safeguards relative to the sensitivity to the information, regardless of the format in which we hold it (physical or electronic) and even when it is being disposed. We regularly train our employees on the importance of maintaining the confidentiality of your information. Please note your information may be processed by our service providers in other country.
- Openness:** We will make clear, easy to understand, and consistent information about our policies and practices relating to the management of Personal Information readily available in writing, by telephone, in publications, and on MOCC's website. We will include details of the accountability for these policies and practices; where to send access to information requests; and how to submit concerns. We will also describe what Personal Information, if any, is made available to others (including subsidiaries or parent) organizations and why. We will not sell your Personal Information.
- Individual Access:** Upon request, we will inform you as to the existence, use, and disclosure of your Personal Information and be given access to that information. You are entitled to question the accuracy and completeness of the information and have it amended as appropriate. We will endeavour to provide this information to you within 30 calendar days, however occasionally we may need additional time and we will communicate these reasons to you. You may access the information we have retained about you by contacting the [MOCC Privacy Office](#).
- Challenging Compliance:** You can challenge our compliance with the above Privacy Principles. We have a simple and easily accessible complaint process. If deficiencies are identified, we will take appropriate measures to correct applicable practices and policies. We will notify you of the outcome of investigations, as appropriate.

## Have a Question About Privacy ?

MOCC is committed to providing you with the best experience that we can. If you have a privacy concern, access to information request, or want to review your preferences, please follow our easy 3-step procedure.

<p><b>Step 1: Talk to our MOCC Client Services Team</b></p> <p><b>How to contact</b>  <b>MOCC Client Services:</b>        Email: <a href="mailto:Client.Service@MeridianOneCap.ca">Client.Service@MeridianOneCap.ca</a>        Toll-free: 1 (866) 986-6738        Mail: Customer Service        PO Box 30597 RPO Madison        Burnaby, BC V5C 6J5</p> <p>If you require additional information and/or are still not satisfied after contacting MOCC Client Services, please feel free to proceed to Step 2 and contact MOCC's Privacy Officer.</p>	<p><b>Step 2: Contact the Privacy Officer</b></p> <p><b>How to contact</b>  <b>MOCC's Privacy Officer:</b>        Email: <a href="mailto:PrivacyOffice@MeridianCU.ca">PrivacyOffice@MeridianCU.ca</a>        Mail: Meridian One Cap Corporation        ATTN: Chief Privacy Officer        75 Corporate Park Drive        St. Catharines, Ontario        L2S 3W3</p> <p>Note: If corresponding by email, please do not include any confidential information as email correspondence is not guaranteed to be secure.</p>	<p><b>Step 3: Provincial or Federal Privacy Commissioner</b></p> <p>If you require additional information and/or are still not satisfied after contacting MOCC's Privacy Officer, you can contact your appropriate Provincial or Federal Privacy Commissioner.</p>
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## Changes to the Privacy Statement

We may update the Privacy Statement from time to time, to ensure alignment with our regulatory obligations and business practices. If we make a change, we will post the updated version on our public website. If we intend to use or disclose your Personal Information for purposes materially different than what is described in the Privacy Statement, we will take reasonable steps to notify you. We encourage you to review the Privacy Statement whenever you interact with us to stay informed about our information practices.

<sup>1</sup> MOCC is a wholly owned subsidiary of Meridian Credit Union Limited.

<sup>2</sup> 'Personal Information' means any factual or subjective information, recorded or not, about an identifiable individual and could include information in any form, such as: age, name, ID numbers, income, ethnic origin; and employee files, credit records, loan records, existence of a dispute between a consumer and a merchant.