



Policy: Privacy Policy	Policy #: P&C - 26
Dept Responsible: People & Culture	Eff Date: 2023-09-05
Companies covered under this Policy (referred to as “the Company”): Cashco Financial Inc., 1393185 Alberta Inc., Cashco Venue Inc.	

Date Reviewed:	Revision Details:	Rev. By:	Revision
June 2023	New policy	Dan Bruinooge	

Purpose

Cashco has an inherent responsibility to be open and accessible while, at the same time, demonstrating the greatest respect for the protection of the personal information of our clients and employees. Cashco will comply with all applicable privacy legislation in all aspects of our business operations and practices. This policy represents Cashco’s organizational commitment to privacy as well as demonstrating its legal and regulatory compliance to the applicable legislation. While not addressed under the applicable legislation, Cashco owes a fiduciary duty to protect the information of its organizational clients. As such, information defined as non-personal shall be treated with the same standard of care as the information covered under this policy.

Policy Statement

1. Accountability:

1.1. Ultimate accountability for Cashco’s compliance to this policy rests with the CEO; who delegates the day-to-day responsibility to the Chief People and Culture Officer who acts as the Privacy Officer for Cashco. Other Cashco employees may be responsible for the day-to-day collection and processing of personal information or to act on behalf of the Privacy Officer.



1.2. Cashco shall implement procedures to support this policy and the applicable privacy legislation, including:

- procedures to protect personal information
- procedures to receive and respond to concerns and inquiries
- procedures to notify individuals and authorities as applicable in the event of a breach of personal information
- training requirements for all employees who handle personal information to understand and follow Cashco's policies and procedures around privacy and personal information protection.

2. Identifying Purposes:

2.1. Cashco shall make reasonable efforts to ensure that the client or employee is aware of the purposes for which personal information is collected, including use by third parties. These purposes can be specified orally, electronically, or in writing.

2.2.a. Cashco may collect client and personal information for the following purposes:

- to meet legal and regulatory requirements.
- to establish a client's identity.
- to protect the client and Cashco against illegal activity.
- to determine the suitability of products and services for a client as well as determining a client's eligibility to obtain products and services, including a client's eligibility for obtaining credit and to exchange credit information on an ongoing basis with other credit suppliers and credit reporting agencies.
- to set up, operate and administer products and services as requested by the client; including the provision of personal information to other service providers involved in the operation and administration of services on behalf of Cashco.
- to provide information and advice on products and services that may be of the client's interest.
- to conduct research to assist Cashco in developing its products and services, to determine products and services that may be of interest to clients, and to obtain feedback on the Cashco's current products and services.
- to disclose information to third parties in connection with the ongoing management of Cashco's assets, including the assignment or sale of loans, and the subsequent



collection, use or disclosure of that information by those third parties and any of their agents or assignees for purposes of managing those assets.

- to provide ombudsman or mediation services to address client concerns regarding Cashco products or services.

2.2.b. Collection of Employee Information

As a condition of employment, Cashco must collect personal information from employees that is reasonable and necessary to comply with legislation, administer compensation and benefits, and to allow Cashco to evaluate the performance of the employee. The personal information collected, used and disclosed is protected by this policy and the applicable privacy legislation. Cashco will collect and use employee personal information for the following purposes:

- to meet legal and regulatory requirements
- to recruit, recognize and retain a highly qualified and motivated workforce. This includes the verification of references and qualifications
- to establish and maintain the employer-employee relationship, including employee performance and disciplinary matters
- to establish an emergency contact and provide disclosed medical information to a first aider or first responder in the event of an emergency
- to administer compensation and benefits
- to administer return to work programs
- to identify individuals for training and career advancement opportunities and complete workforce planning and succession planning activities
- to ensure that employees understand and comply with Cashco's policies and procedures

2.3. When personal information that has been previously collected is to be used for a purpose that has not been previously identified, the new purpose shall be identified and the client or employee's consent shall be obtained prior to the information being used for the new purpose. If the new use is either required by law or it is otherwise impossible or impractical to obtain consent, the client or employee's consent will not be obtained. Refer to Section 3 (Consent) for more information.

3. Consent:

3.1. Consent is required for the collection, use or disclosure of personal information. In certain circumstances, consent may be obtained after the information has been collected but before its use.



3.2. Cashco shall make a reasonable effort to ensure that the client or employee is aware of the purposes for which the information will be used. The purposes for collection, use, or disclosure will be explained to the client or employee in a clear, understandable way before consent is obtained.

3.3. Cashco shall not require a client to consent to the collection, use or disclosure of information beyond what is required to fulfil explicitly specified and legitimate purposes as a condition for supplying a product or service. Cashco shall not obtain a client's consent through deceptive measures.

3.4. The way in which Cashco shall seek consent may vary, depending on the circumstances and the type of information collected. Cashco will rely on implied consent for all information not deemed sensitive. Clients can give consent in the following manner:

- in writing, such as completing and signing an application
- through inaction, such as failing to check a box indication that they do not wish their information to be used for optional purposes.
- orally, such as information collected over the telephone or in person
- at the time a product or service is used
- through an authorized representative, such as a legal guardian or Attorney

3.5. Cashco may collect, use or disclose personal information without consent in circumstances where it is legally impossible or impractical to obtain consent. Legal exemptions to the consent requirement are covered in Section 4 (Limiting Collection), and Section 5 (Use, Disclosure, and Retention) of this policy. Other circumstances where consent may not be obtained include:

- instances where consent may not be possible or appropriate in the event the client is a minor, seriously ill, incapacitated, or otherwise unable to provide consent.
- express consent will not be obtained when personal information is given to suppliers or agents of Cashco who need it to carry out functions that would reasonably be expected to be required in connection with a service.
- when Cashco obtains client lists from another organization, Cashco will assume that the organization providing the personal information will have obtained consent of the individuals appearing on the list prior to disclosing it to Cashco.

3.6. Subject to legal or contractual restrictions on Cashco, a client may withdraw consent at any time provided that:



- reasonable notice of the withdrawal is given to Cashco in writing and includes the understanding by the client that withdrawal of consent could mean that Cashco is prohibited from providing the client with a related product, service, information of value, and possibly continued services
- consent does not relate to a credit product requiring the collection and reporting of information after credit has been granted. Cashco shall inform the client of the implications of such withdrawal.

4. Limiting Collection:

4.1 Cashco shall not collect personal information indiscriminately. Cashco shall ensure the information collected is limited to the information necessary to fulfill the identified purposes and in accordance with our documented policies and procedures.

4.2 Cashco shall collect personal information via fair and lawful means, and not by misleading or deceiving clients and/or employees about the purpose for which the information is being collected.

4.3.a. Collection of Client or Customer Information without Consent The knowledge and consent of a client is required for the collection of personal information except in the following circumstances:

- a reasonable person would consider the collection of the information to be clearly in the interests of the individual and consent of the individual cannot be obtained in a timely way or the individual would not be reasonably expected to withhold consent.
- the collection of the information is authorized or required by:
 - a provincial or federal statute or regulation
 - a bylaw of a local government body
 - legislative instrument of a professional regulatory organization
- the collection of the information is from a public body and that public body is authorized or required by a provincial or federal enactment to disclose the information
- the collection of information is reasonable for the purposes of an investigation or legal proceeding
- the information is publicly available
- the collection is necessary to determine the individual's suitability to receive an honour, award, or similar benefit, including an honorary degree, scholarship, or bursary
- the information is collected by a credit reporting agency where the individual has consented to the disclosure to the credit reporting organizations by the organization that originally collected the information



- the collection of the information is necessary in order to collect a debt owed to the organization or for the organization to repay the individual money owed by the organization

4.3.b. Collection of Employee Information without Consent Cashco is permitted by law to collect personal employee information without consent of the employee provided that:

- the information collected is solely for the purposes of establishing, managing, or terminating an employment relationship
- it is reasonable to collect the information for the particular purposes for which it is being collected
- in the case of current employees, the organization has provided reasonable notification that personal employee information will be collected and the purposes for its collection.

4.4. In the event that Cashco uses a Service Provider located outside Canada to collect personal information from a client who has given consent, or directly or indirectly transfers to a Service Provider located outside Canada personal information about a client who has given consent, Cashco shall provide notification to the client about the following:

- contact information for the person who is able to answer on behalf of Cashco, client questions about the collection, use, disclosure or storage of personal information by Service Providers outside Canada

5. Use, Retention and Disclosure:

5.1. When personal information is used for a new purpose, Cashco shall document the new purpose and obtain consent as required.

5.2.a. Use of Client or Client Information without Consent The knowledge and consent of a client is required for the use of personal information except in the following circumstances:

- a reasonable person would consider the use of the information to be clearly in the interests of the individual and consent of the individual cannot be obtained in a timely way or the individual would not be reasonably expected to withhold consent.
- the use of the information is authorized or required by:
 - a provincial or federal statute or regulation
 - a bylaw of a local government body
 - legislative instrument of a professional regulatory organization



- the collection of the information is from a public body and that public body is authorized or required by a provincial or federal enactment to disclose the information
- the use of information is reasonable for the purposes of an investigation or legal proceeding
- the information is publicly available
- the use is necessary to determine the individual's suitability to receive an honour, award, or similar benefit, including an honorary degree, scholarship, or bursary
- a credit reporting organization was permitted to collect the information and the information is not used by the credit reporting organization for any purpose other than to create a credit report
- the use of the information is necessary to respond to an emergency that threatens the life, health or security of an individual or the public
- the use of the information is necessary in order to collect a debt owed to the organization or for the organization to repay the individual money owed by the organization.

5.2.b. Use of Employee Information without Consent Cashco is permitted by law to use personal employee information without consent of the employee provided that:

- the information is used solely for the purposes of establishing, managing, or terminating an employment relationship
- it is reasonable to use the information for the particular purpose for which it is being used
- in the case of current employees, the organization has, before using the information, provided reasonable notification that personal employee information will be used and the purposes for which the information will be used

5.3.a. Disclosure of Client Information without Consent The knowledge and consent of a client is required for the disclosure of personal information except in the following circumstances:

- a reasonable person would consider the disclosure of the information to be clearly in the interests of the individual and consent of the individual cannot be obtained in a timely way or the individual would not be reasonable expected to withhold consent.
- the disclosure of the information is authorized or required by:
 - a provincial or federal statute or regulation
 - a bylaw of a local government body
 - legislative instrument of a professional regulatory organization

- the disclosure of the information is to a public body and that public body is authorized or required by a provincial or federal enactment to collect the information
- the disclosure of the information is for the purpose of complying with a subpoena, warrant or order issued or made by a court, person, or body having jurisdiction to compel the production of information or with a rule of court that relates to the production of information
- the disclosure of the information is to a public body or law enforcement agency in Canada to assist in an investigation undertaken with a view to a law enforcement proceeding, or from which a law enforcement proceeding is likely to result
- the disclosure of the information is necessary to respond to an emergency that threatens the life, health, or security of an individual or the public
- the disclosure of the information is for purposes of contacting the next of kin, or a friend of an injured, ill, or deceased individual
- the disclosure of the information is necessary in order to collect a debt owed to the organization or for the organization to repay the individual money owed by the organization
- . • the information is publicly available
- the disclosure of the information is to the surviving spouse or adult interdependent partner or to a relative of a deceased individual if, in the opinion of the organization, the disclosure is reasonable
- the disclosure is necessary to determine the individual's suitability to receive an honour, award, or similar benefit, including an honorary degree, scholarship, or bursary
- the disclosure of the information is reasonable for the purposes of an investigation or a legal proceeding
- the disclosure of the information is for purposes of protecting against, or for the prevention, detection, or suppression of, fraud, and the information is disclosed to or by
 - an organization that is permitted or otherwise empowered or recognized to carry out any of these purposes under a federal or provincial statute or regulation, or a Ministerial order made under a federal or provincial statute or regulation
 - Investigative Services, a division of the Insurance Bureau of Canada
- the organization is a credit reporting organization and is permitted to disclose the information under the Consumer Protection Act.



5.3.b. Disclosure of Employee Information without Consent Cashco is permitted by law to disclose personal employee information without consent of the employee provided that:

- the information is disclosed solely for the purposes of establishing, managing, or terminating an employment relationship
- it is reasonable to disclose the information for the particular purpose for which it is being disclosed
- in the case of current employees, the organization has, before disclosing the information, provided reasonable notification that personal employee information will be disclosed and the purposes for which the information will be disclosed.
- Cashco may disclose personal information about a current or former employee to a potential or current employer without employee consent if:
 - the information that is being disclosed was collected as personal employee information
 - the disclosure is reasonable for the purpose of assisting the employer to determine the individual's eligibility or suitability for a position with that employer.
 - All requests for employment references must be referred to the People and Culture department.

5.4. Cashco shall protect the interests of its employees and clients by taking reasonable steps to ensure that:

- any orders or demands received by Cashco comply with the laws under which they were issued
- only the personal information that is legally required is disclosed and nothing more
- casual requests for information are denied
- personal information disclosed to unrelated Third Party suppliers of non-financial services is strictly limited to programs endorsed by Cashco and Cashco shall make a reasonable effort to notify a client if an order has been received, if not contrary to the security of Cashco and the law allows it. Notification may be by telephone, letter to the client's usual address, or by any other means as Cashco deems appropriate.

5.5. Cashco shall maintain guidelines and procedures with respect to the retention of personal information. These guidelines shall include the minimum and maximum retention periods regarding personal information and may be subject to legislative requirements. Personal information that has been used to make a decision about a client shall be retained long enough to allow the client to access to the information after the decision has been made.



5.6. Subject to any legal or regulatory requirement to retain records, personal information that is no longer required to fulfil the identified purposes shall be destroyed, erased or made anonymous.

6. Accuracy:

6.1. The extent to which personal information will be accurate, complete, and up-to-date will depend upon the use of the information and take into account the interests of the client and/or employee. Cashco will rely on the client and/or employee to keep certain personal information accurate such as name and address. Information shall be sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about a client and/or employee.

6.2. Cashco shall not routinely update personal information, unless the process is necessary for the purposes for which the information is used or as required by law or regulation.

6.3. Personal information that is used on an ongoing basis, including information that is disclosed to third parties, will generally be accurate and up-to-date unless limits to the requirement for accuracy are clearly set out.

7. Safeguards

7.1. Cashco shall use security safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Cashco shall protect personal information regardless of the format in which it is held.

7.2. The nature of the safeguards will vary depending on the sensitivity, amount, distribution and format of the information, and the method of storage. More sensitive information will be safeguarded by a higher level of protection.

7.3. Cashco shall use the following methods of protection for personal information:

- Physical Safeguards such as locked filing cabinets, and restricted access to personal information.
- Organizational Safeguards such as controlled entry to data centres and limiting access to information on a “need to know” basis.
- Technical Safeguards such as personal identification numbers, passwords and encryption
- Investigative Safeguards in cases where Cashco has reasonable grounds to believe that personal information is being inappropriately collected, used, or disclosed

7.4. Cashco shall regularly remind employees of the importance of maintaining the confidentiality of client and/or employee personal information.



7.5. Cashco may disclose personal information to third parties such as data processing, collection, and credit bureau reports in the provision of services to our clients. These third parties shall be required to safeguard the personal information disclosed to them in a manner consistent to personal information under Cashco control.

7.6. Cashco shall use care in the disposal or destruction of personal information, to prevent unauthorized parties from gaining access to the information

8. Individual Access

8.1. Upon request, Cashco shall inform a client or employee of the existence, use, disclosure, and source of personal information about them held by Cashco and shall allow reasonable access to this information.

8.2. In some cases, Cashco may not be able to provide access to all of the personal information that it holds. Cashco shall limit these cases wherever possible. Cashco may deny access to personal information for the following reasons:

- the information is protected by legal privilege
- disclosure of the information would reveal confidential information that is of a commercial nature and it is not unreasonable to withhold this information
- the information was collected for an investigation or legal proceeding
- the information was generated in the course of a formal dispute resolution
- the disclosure of the information could reasonably be expected to threaten the life or security of another individual
- the information would reveal personal information about another individual
- the information would reveal the identity of an individual who has in confidence provided an opinion about another individual and the individual providing the opinion does not consent to the disclosure of his/her identity If Cashco can reasonably omit the information referred to in the above sections from record(s) that contain personal information about the client and/or, Cashco shall provide access to the remaining parts of the record.

8.3 Cashco shall respond to a client or employee request within a reasonable time and at a reasonable cost to the client. The requested information shall be provided or made available in a form that is generally understandable. Cashco shall not charge for access to personal employee information.

9.0 Video, Sound and Electronic Device Use



9.1 Cashco will utilize video and sound in branches and other locations for safety, security and training purposes. The locations of the video and use of sound will not violate any laws and legislation.

9.2 Cashco will use video and sound at all times deemed appropriate by management when the branch is open and will be used in all public places. It will be used to:

- Record conversations with clients and employees for training purposes
- Record conversations and meetings with clients for safety and a record
- Record all access to the branch in cases of breaks in and robbery

9.3 There will be visible signage placed in all branches identifying the use of video and sound and the reasons why Cashco is utilizing video and sound.

9.4 Clients may request not to be on video and sound and the Cashco employee will determine if they wish to continue to meet with the client or advise them we cannot provide service without video and sound.

9.5 Cashco may monitor company cell phones, company computers, and any other electronic devices owned and/or operated by Cashco and Cashco employees for the purposes of ensuring appropriate use of such devices in accordance with Cashco Policies and what would be deemed reasonable company use. If an employee is using a personal device at work it may be subject to monitoring if there is reason to believe it is being used inappropriately in the workplace. Any inappropriate use of company devices or personal devices in the workplace is subject to corrective action up to and including dismissal.

10. Compliance:

10.1. Cashco shall maintain procedures to receive and respond to complaints and inquiries about their policies and procedures relating to the handling of personal information.

10.2. Cashco shall inform clients who make inquiries or lodge complaints about the existence of the relevant complaint procedures. If the complaint is not satisfactorily resolved by the Privacy Officer, it may be escalated to the CEO for final arbitration. If the issue is unable to be resolved satisfactorily by the CEO, Cashco shall implement procedures to refer the client to the Office of the Information and any Privacy Commissioners.

10.3. Cashco shall investigate all reasonable concerns. If a concern is found to be justified, Cashco shall take appropriate measures, including the revision of personal information and, if necessary, amending its policies and procedures.

Corrective Action



Employees not abiding by these guidelines will be subject to measures in accordance with Cashco's Corrective Action Policy.

Exceptions

Any exceptions to this policy must be approved by the Privacy Officer or designate. All requests for exceptions must be submitted in writing to the Privacy Officer.

Definitions

Personal Information – information about an identifiable individual but does not include the name, title, or business contact information (address, telephone number, email) of an employee of an organization.

Non-Personal Information – information that is not about an identifiable individual. For the purposes of this policy, non-personal information shall include information about corporations, organizations, municipalities and societies.

Client – refers to an individual who has a product or service with Cashco.

Employee – An employee is an individual hired by Cashco to perform a function and is subject to the policies and procedures of Cashco. For purposes of this policy, employees shall also include individuals under contract who handle personal information.

Control – any personal information that has been collected by, is in the custody or possession of, and/or is used within Cashco, including information that has been transferred to a third party for processing purposes.

Purpose – provides the description of why the personal information must be collected, used, or disclosed.

Use – any activity based on a purpose that involves accessing, analyzing, compiling, sorting, storing, retrieving, reviewing, amending, updating, deleting, manipulating, or transferring personal information.

Express Consent – the individual specifically agrees to collection, use or disclosure of personal information for specified purposes. This type of consent may be provided orally or in writing (including electronically).

Implied Consent - there is no specific agreement by the individual; however, the purpose for which the personal information will be used is self-evident or obvious, and it is reasonable that the individual would voluntarily provide the information for that purpose.

Third Party – a party that is not a party to the agreement between Cashco and its clients and/or employees.



Affiliate – any company that is directly or indirectly owned, wholly or partially, by Cashco