

DUNBRIDGE FINANCIAL INC. Privacy Policy

Last Updated: 18-Mar-20

At Dunbridge Financial, we respect your privacy.

We understand that by entrusting us with your personal and corporate information, we have a responsibility to provide transparency with respect to our privacy practices.

Overview of Policy

This Privacy Policy (the "Policy") describes the information we collect from you and how that information is used and shared by us. It also includes details about the choices we offer you in relation to that information. Please review it carefully.

As used in this Policy, "we," "us" and "our" refers to Dunbridge Financial Inc.

In addition to cookies, we use other similar technologies to track users of our Services and visitors to our Site for the purposes stated below. Examples of these technologies include:

Scope

This policy applies to any user of any of our services, whether accessed through our website, mobile app, API or other channel. Additionally, this policy applies to anyone who contacts us or otherwise submits information to us. This policy does not apply to third-party websites, products or services even if they are linked to our services.

Definitions

For the purpose of this Policy, "Personal Data" refers to information that could be used to identify you. "Site" means the DUNBRIDGE FINANCIAL INC. website, mobile app, or other channel through which you access our services.

How We Collect Information

We collect information about you through a variety of different channels, including the following:

Information you Provide

You provide Personal Data and other information to us when you register for an DUNBRIDGE FINANCIAL INC. user account, submit to our verification procedures, apply for additional account features or services, respond to our emails or surveys, communicate with us, provide feedback, participate in promotions or contests, provide referrals, or upload content.

Information from Your Use of Services

When you use our services or visit any of our Sites, we collect information about you and the devices you use to access the services.

Information from Third Parties

We also collect information about you from third parties and other sources including information obtained from identification verification and fraud detection service providers, credit bureaus, community forums used to post ratings or reviews, DUNBRIDGE FINANCIAL INC. business partners through which you access our services, or other sources of public records.

Information We Collect

Identification information

We may collect some or all of the following Personal Data: your name, date of birth, mailing address, phone number, email address, social insurance number or other tax identification number. To comply with federal laws and regulations, we may collect identity verification information such as copies of your government-issued identification (including passport, driver's license or national ID card) or other authentication information, all of which may include photographs of you.

Financial Information

In order to process payments and transactions we may collect financial information such as bank account details (account number, routing number), credit or debit card numbers, credit reports or tax information, such as withholding allowances and filing status.

Transaction Information

When you book transactions with us, we may collect information about the parties to the transaction, the designated recipient (including the recipient's bank account information), the source of the funds, the reason for the transaction, the devices and payment methods used to complete transactions.

Business Information

If you are using our services on behalf of a business entity, we may collect information about the business including: the organizational structure of the company, the product and service offerings, website domain name used by the business, and information about the beneficial owners of the business. We also may collect entity formation documents or other corporate records.

Background Information

To the extent permitted by applicable law, we may obtain background check reports from public records of criminal convictions and arrest records. In order to obtain such reports, we may use information or Personal Data you provide to us.

Log Data

When you access our services, we collect server logs which may include information such as IP address, access times and dates, pages viewed and other system activity, including the third-party site you were using before accessing our services.

Device Information

We may obtain information about the devices you use to access our services including: the device type, operating systems and versions, the device manufacturer and model, preferred languages, and plugins.

Usage and Preference Information

We collect information about how you interact with the DUNBRIDGE FINANCIAL INC. site and how you use our services including your user preferences and other settings selected by you. In some cases we do this by utilizing cookies, pixel tags and similar technologies. Please see further details about cookies and other tracking technologies in our Cookie Policy.

Geolocation Information

When you use certain features of our services, we may collect information about your precise or approximate location as determined by data such as your IP address or mobile device GPS. Most mobile devices allow you to control or disable the use of geolocation services for applications by changing preferences on your mobile device.

Aggregated/Anonymized Data

We may also collect information about our users that is combined so that it no longer identifies or references an individual user. This de-identified data is used for industry and market analysis, demographic profiling, marketing and advertising, and other business purposes.

Other Information

Any other information you may provide us when you update your account information, respond to surveys, post to community forums, participate in contests or promotions or use any other feature of our services.

How We Use Your Information

We use information we collect from or about you for several purposes, including:

To provide or improve our services	To provide or improve our services To process payments or money transfers To provide customer support To evaluate your application to use our services To develop new products or enhance existing products and services. To monitor and analyze trends, usage and other user activities on our Sites to optimize user experience. For quality control and staff training
To ensure safety and security	To verify your identity or authenticate your right to access an account or other information.

	To conduct manual or system monitoring to protect against fraud and other harmful activity.
To comply with legal obligations	To respond to legal process, governmental authorities or comply with applicable laws. To address disputes or resolve claims related to use of the services. To enforce our terms and conditions and collect fees.
To communicate with you	To respond to your inquiries and support requests. To send you technical notices, updates, security alerts and other administrative messages. To provide information related to your transactions including confirmations, receipts and tracking notices.
To market and advertise our services	To deliver promotional offers, incentives, and targeted marketing in accordance with your preferences (as permitted by applicable law). To provide invitations and information about events or events held by our partners. To facilitate promotional contests or sweepstakes.

Information Sharing and Disclosure

We will never sell, loan or rent your Personal Data to marketers or other third parties. We may disclose or otherwise provide anonymized aggregate data to third-parties. Additionally, we may share information about you, including Personal Data with the following third parties:

Our Service Providers

We engage a variety of service providers to enable us to provide our services to you. For example, service providers may be used to: facilitate payment processing, support technology or infrastructure, conduct market research, and perform audits or other functions. We will share your Personal Data with such service providers only to the extent necessary to allow the performance of their intended engagement. All service providers and business partners that receive your Personal Data are contractually bound to protect and use your information only in accordance with this Policy.

Our Corporate Affiliates

To facilitate or support us in providing our services to you, we may share your Personal Data within our worldwide corporate family of companies among entities that are related by common control or ownership.

Other Authorized Parties

If you provide your consent, we may share your information including your Personal Data with a third party not defined in this Policy. Such disclosure will only be carried out in the manner described to you at the time you agreed to the sharing. Authorizing a third-party application or website to access your DUNBRIDGE FINANCIAL INC. account or participating in certain promotional activities constitutes such consent to share your information.

Government Authorities

If we believe it is necessary, we may share your information with law enforcement officials, government authorities, or other third parties as required to: (i) enforce our User Agreement or other applicable agreements or policies; (ii) protect our rights, property, privacy, or security, or that of others; or (iii) comply with applicable law, legal process or governmental orders.

Third-Party Acquirers

If we are the subject or are involved in any corporate merger, acquisition, consolidation, reorganization, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with bankruptcy or similar proceedings), we may share data with third parties during negotiations. In the event your Personal Data becomes subject to a different privacy policy, we will make reasonable efforts to notify you beforehand. We also may need to disclose information to a third party in connection with a commercial transaction where we or any of our affiliates are seeking financing, investment or funding.

Cookies and Tracking Technologies

We use cookies and similar technologies (i.e. web beacons, pixels, ad tags and device identifiers) to recognize you and to customize your online experience. To learn more about cookies and the other tracking technologies we may utilize, please refer to our Cookie

Policy, which includes a comprehensive overview of cookies and provides further details about how we use cookies and how to control our use of cookies.

Advertising Analytics

We may partner with third-parties to display DUNBRIDGE FINANCIAL INC. advertisements to you across the Internet and to track and report on the performance of those advertisements. These third-party partners use cookies and other technologies to gather information about your activities on our Sites as well as other sites you visit in order to serve you advertising based upon your browsing history and interests. To learn more about behavioral advertising and online tracking, visit the Network Advertising Initiative. This website also provides information about how to opt out of interest-based online advertising delivered by member companies. For more information about the cookies that may be served through use of our services, please refer to our Cookie Policy.

Choices and Transparency

You have choices about how we use and disclose your Personal Data as well as what information we may access or hold about you.

Managing Your Information

You may review, correct or update information you provided to us at any time by logging into your DUNBRIDGE FINANCIAL INC. account or by contacting us using the contact details below. We will respond to any such request in a reasonable timeframe. Prior to changing or correcting your information, we may be required to verify your identity. There may be circumstances which preclude us from providing access to some or all of your information, for example where the information contains references to Personal Data about an individual other than you or the information is subject to legal or proprietary protections.

Device Permissions

Most mobile devices allow you to disable the use of location services, or revoke consent to applications to access your camera and photo library or send you push notifications information. Please refer your device settings to restrict collection of certain information.

Marketing Opt-Out

You can opt out of receiving promotional communications or marketing-related email from DUNBRIDGE FINANCIAL INC. by adjusting your contact preferences under the "Your Profile" section or "Profile & Settings - Notifications" section. You may also opt out of receiving promotional communications from us by following the instructions included in those messages. Please note that if you opt out of marketing-related emails from us, we will continue to send you non-promotional messages that are required to provide our services, such as transactional receipts and messages about your account or our relationship with you.

Information Retention

We will retain your Personal Data only for the period of time required to comply with applicable law or fulfill any ongoing obligations to you. Please note that there are certain circumstances in which we will retain your Personal Data even after you close your DUNBRIDGE FINANCIAL INC. account or request deletion of your Personal Data. Examples of such cases include:

- To process any transactions booked prior to closure or deactivation of an account.
- To comply with anti-money laundering regulations or other laws and rules that apply to us as a financial services provider.
- To detect or prevent fraud.
- To comply with legal process orders or law enforcement requests.
- To collect any fees or other outstanding amount owed and payable to us by you.
- To resolve any disputes or enforce our User Agreement or other applicable agreements or policies.
- To take any other action or exercise any other right in accordance with applicable law.

Storage and Cross-Border Transfers

To support our global operations, we may store or process your Personal Data in any country where we or one of our affiliates maintains a physical presence or where we engage third-party service providers. This could result in a transfer of your Personal Data to a country outside of your country of residence, including the United States. The laws and privacy regulations of such countries may differ from the country of your residence and potentially may not be as protective. There may be circumstances in which the law enforcement agencies or government authorities in such other countries may be entitled to access your Personal Data. Any transfer of your Personal Data outside your country of residence will at all times comply with the standards set forth in this policy as well as the applicable data protection rules.

Security

We take reasonable technical, physical and administrative measures to safeguard your Personal Data against loss, misuse or unauthorized access. Unfortunately, the transmission of information over the Internet is never 100% secure and no data storage system can be guaranteed safe. Although we will do our best to protect your Personal Data, we cannot warrant the security of data transmitted to our Sites; any transmission is at your own risk. We encourage you to understand the integral role you play in keeping your own Personal Data secure and confidential. Please select passwords that are sufficiently complex and always keep our log-in details secure. If you suspect any unauthorized use or access to your account or information, please contact us immediately.

Children

Our services are not intended for or directed at children under the age of 13. We do not knowingly collect any information from children. If we obtain actual knowledge that we have collected Personal Data from an individual under the age of 13, we will immediately delete it (unless we are legally obligated to retain such information). Please contact us if you believe that we inadvertently collected information from any individual under the age of 13.

Updates to This Policy

We reserve the right to make changes to this policy at any time by posting a revised version to our Site and updating the "Last Updated" date at the top of this policy. If we make material changes, we will provide reasonable notice to you, including by email to the email address associated with your DUNBRIDGE FINANCIAL INC. account. To the extent permitted by applicable law, your continued use of our services after such notice or posting constitutes your consent to our revisions of this Policy. If you disagree with any of our changes, you may deactivate your account with us at any time.

Contact Us

If you have questions or concerns about this policy, or a specific request related to your Personal Data, please contact us at privacy@Dunbridgefinancial.com or at:

DUNBRIDGE FINANCIAL INC.

Suite 110 - 700 Third line, Oakville, ON L6L 4B1
Attn: Privacy Office

If you are not satisfied with the resolution of any complaint you make with us concerning your privacy, you may submit a complaint to the Privacy Commissioner in your province of residence or to the Office of the Privacy Commissioner of Canada at:

Office of the Privacy Commissioner of Canada
30 Victoria Street, 1st Floor
Gatineau, QC K1A 1H3
1-800-282-1376
www.priv.gc.ca