

Last Updated: November 15, 2018.

Your privacy is important to Canada Drives Ltd. and its corporate affiliates, including Canada Drives Auto Finance Ltd., Spring Financial Inc. and 1025479 B.C. LTD (collectively “**Canada Drives Group**” and each a “**Canada Drives Company**”). This Privacy Policy explains how Canada Drives Group collects, uses, discloses and retains personal information, including information collected by Canada Drives Group through websites and telephone calls and when providing products or services.

1. Your Consent

By providing a Canada Drives Company with your personal information, you consent to the collection, use, disclosure and retention of that information by the Canada Drives Company and other members of the Canada Drives Group in accordance with this Privacy Policy and as otherwise permitted by applicable law. You may withdraw your consent at any time, subject to legal or contractual restrictions and on reasonable notice to Canada Drives Group, but then you might not be able to proceed with your intended interactions or transactions with Canada Drives Group or otherwise receive the full benefit of Canada Drives Group’s products and services.

2. Personal Information

In this Privacy Policy, “**personal information**” means information about an identifiable individual, such as an individual’s name and email address, but does not include (to the extent permitted by law) information that is publicly available in a telephone directory or that is business contact information that enables an individual to be contacted at a place of business.

3. Information That Canada Drives Group Collects

(a) Information You Provide

You may be asked to voluntarily give your personal information to a Canada Drives Company when you interact, orally, in writing or by electronic transmission, with the Canada Drives Company, including when you apply for an account or membership, subscribe to a newsletter, register to receive information, apply or register for or order a product or service offered by a Canada Drives Company or use a product or service provided by a Canada Drives Company. In those circumstances, you can choose not to provide certain requested personal information, but then you might not be able to proceed with your intended interaction or transaction with the Canada Drives Company or otherwise receive the full benefit of the desired product or service. Telephone calls between you and the Canada Drives Company will be recorded to ensure accuracy and quality assurance, and may be disclosed to third parties to verify the Canada Drives Company is compliant with its contractual obligations to third parties. You can choose not to have the telephone call recorded, and communicate by writing or electronic transmission.

(b) Automated Collection

A Canada Drives Company may automatically collect certain information regarding your use of the Canada Drives Company’s website or online service, such as the dates and times that you access the website or online service, the browsers, operating systems, software and devices that you use to access the website or online service and details of your use of the website or online service.

A Canada Drives Company’s websites, online services, email messages and advertisements may use technologies (e.g. cookies, web beacons, tokens, pixels or tags) to collect information that assists the Canada Drives Company to improve its products, services, customer communications and advertising and to prevent fraud. A Canada Drives Company may use information that it collects through technological means to recognize you as a user of the Canada Drives Company’s websites or online services, to facilitate and improve your use of the Canada Drives Company’s websites or online services, to confirm that messages have been delivered to and opened by you and to provide you with targeted advertisements. You may choose to decline or disable cookies if your web browser or device permits, but doing so may affect your ability to access or use certain features of

a website or online service. More information about cookies used for interest-based advertising is set out in section 4(c) below.

Much of the information that is automatically collected by technological means is non-personal information (because the information does not identify you), and Canada Drives Group will deal with that non-personal information as explained below in this Privacy Policy unless applicable law requires otherwise.

(c) Credit Reports

When you apply or register for, order or use certain products or services from a Canada Drives Company (e.g. a referral to a car dealer for a financed car purchase), the Canada Drives Company may obtain your credit score and related information from a credit reporting agency to process or fulfill the transaction. The Canada Drives Company may continue to periodically obtain your credit score and related information from a credit reporting agency to update your confidential profile for use by Canada Drives Group as set out in this Privacy Policy. Upon your request we will inform you if we have ordered such a report or reports, and will give you the name and address of the credit reporting agency that furnished the report or reports.

You also acknowledge and agree that any dealers or other persons or organizations to which we have disclosed your personal information in accordance with this Privacy Policy, may request a credit report for any legitimate purpose associated with your application [for credit, extending credit, modifying the terms of your credit agreement, or collection on your account.]

(d) Information Regarding Referred Transactions

If a Canada Drives Company refers you to an independent business (e.g. a car dealer, lender or credit card company) for a proposed transaction (e.g. a car purchase, loan or credit card), then the Canada Drives Company may collect from that independent business information regarding the transaction to update your confidential profile for use by Canada Drives Group as set out in this Privacy Policy.

4. How Canada Drives Group Uses Personal Information

(a) General

Each Canada Drives Company uses your personal information collected by the Canada Drives Company for purposes relating to or arising from your relationship and transactions with the Canada Drives Company and as otherwise set out in this Privacy Policy or permitted by applicable law, including:

- to administer your relationship with Canada Drives Group, including to create and manage your account or membership with Canada Drives Group and to contact and correspond with you regarding those matters;
- to facilitate your interactions and transactions with Canada Drives Group, including to process your applications, requests, orders and payments;
- to provide products and services to you;
- to process and respond to your inquiries, requests and other communications;
- to provide you with information (including by email and other electronic messages) regarding Canada Drives Group and its products and services and related products and services offered by other businesses, to the extent permitted by applicable law;
- to administer and facilitate your participation in contests and promotions related to Canada Drives Group;
- to maintain, protect and improve Canada Drives Group's products and services and to develop new products and services;
- to protect and enforce Canada Drives Group's legal rights, interests and remedies and to protect the business, operations and customers of Canada Drives Group or other persons; and

- to assist other Canada Drives Companies to collect, use, disclose and retain your personal information in accordance with this Privacy Policy.

(b) Canada Drives Group

A Canada Drives Company may share your personal information with the entire Canada Drives Group, and the Canada Drives Group may develop, maintain and share a confidential profile for you for use by each Canada Drives Company to provide information, products and services to you, to facilitate your dealings with each Canada Drives Company and as otherwise set out in this Privacy Policy.

(c) Interest-Based Advertising

The Canada Drives Group may use interest-based advertising services (sometimes called “remarketing” or “retargeting”) provided by third party vendors (such as Google and Facebook) to display advertisements on third party websites and social media sites visited by users of a Canada Drives Group website. Advertising vendors (such as Google and Facebook) use cookies, pixels or tokens – unique identifiers of a web browser on a specific computer that are installed on the computer when it accesses Canada Drives Group websites – to display ads based on the computer’s past access to Canada Drives Group websites. You can opt-out of Google’s use of cookies by visiting Google’s Ads Settings. You can also opt out of a remarketing vendor’s use of cookies by visiting the Network Advertising Initiative’s consumer opt-out page.

5. How Canada Drives Group Discloses Personal Information

(a) General

Each Canada Drives Company discloses your personal information for purposes relating to or arising from your relationship and transactions with the Canada Drives Company and as otherwise set out in this Privacy Policy or permitted by applicable law.

(b) Specific Consents

A Canada Drives Company may disclose your personal information in accordance with express or implied consents that you give during your interactions and transactions with the Canada Drives Company.

(c) Referred Transactions

If a Canada Drives Company refers you to an independent business (e.g. a car dealer, lender or credit card company) for a proposed transaction (e.g. a car purchase, loan or credit card application), then the Canada Drives Company may disclose your personal information (including your credit score and related information) to the independent business to facilitate the proposed transaction. Canada Drives Group has no control over, or responsibility or liability for, the use, disclosure or retention of your personal information by the independent business, and the use, disclosure and retention of the disclosed information by the independent business is not subject to this Privacy Policy.

(d) Suppliers and Service Providers

A Canada Drives Company may disclose your personal information to its suppliers and service providers (including fraud prevention services and payment processors) to assist the Canada Drives Company in the provision of information, products and services to you, to provide services to the Canada Drives Company, to assist the Canada Drives Company to use your personal information as set out in this Privacy Policy and as otherwise permitted by applicable law.

(e) Law Enforcement/Legal Disclosures

A Canada Drives Company may disclose your personal information as required or authorized by applicable law, including to comply with a subpoena, warrant or court or arbitral order or litigation disclosure obligation. A Canada Drives Company may disclose your personal information to law enforcement agencies or other

independent organizations if the Canada Drives Company reasonably believes the disclosure is necessary or appropriate in connection with national security, law enforcement or other issues of public importance, or if the Canada Drives Company reasonably believes the disclosure is necessary or appropriate to protect and enforce the Canada Drives Company's legal rights, interests and remedies or to protect the rights, interests, business, operations or customers of the Canada Drives Company or other persons (including to detect and prevent fraud and other illegal activities, enforce any of the terms of use, terms of service or other agreements that govern access to or use of any of the Canada Drives Company's products or services). A Canada Drives Company has no control over, or responsibility or liability for, the use, disclosure or retention of your personal information by the agencies, independent organizations or other persons to whom the Canada Drives Company discloses the information in the foregoing circumstances, and the use, disclosure and retention of the disclosed information by those agencies, independent organizations or other persons is not subject to this Privacy Policy.

(f) Business Transactions

A Canada Drives Company may disclose your personal information in connection with a proposed or actual business transaction in which the Canada Drives Company is involved (such as a corporate amalgamation, reorganization, merger or acquisition, or the sale or transfer of some or all of the Canada Drives Company's business or assets), but the Canada Drives Company will require the information recipient agree to protect the privacy of your personal information in a manner that is consistent with this Privacy Policy and applicable law.

6. Location of Personal Information

Canada Drives Group and its service providers may process, store and use your personal information at facilities in various countries, including Canada, the United States of America and one or more countries in Europe or Asia. The personal information protection laws of those other countries might be different from the laws of the jurisdiction in which you reside, and might permit courts, government, law enforcement agencies, regulatory agencies and security authorities to access your personal information without notice. By providing your personal information to a Canada Drives Company, you consent to the transfer of the personal information to facilities located in other countries and the processing and storage of the personal information at those facilities.

7. Retention of Personal Information

Canada Drives Group retains your personal information for the period reasonably necessary for the purposes set out or referenced in this Privacy Policy and to comply with Canada Drives Group's legal obligations or enforce or protect Canada Drives Group's legal rights, or a longer period required or permitted by applicable law. Canada Drives Group will delete or dispose of your personal information when Canada Drives Group is no longer reasonably required to retain the information for the purposes set out or referenced in this Privacy Policy.

8. Protection of Personal Information

Canada Drives Group uses reasonable safeguards – including administrative, physical and technical security and safeguarding measures – appropriate to the sensitivity of the personal information in Canada Drives Group's possession or under Canada Drives Group's control to help protect the information from unauthorized access, collection, use, disclosure, disposal or similar risks. Nevertheless, security risks cannot be eliminated and Canada Drives Group cannot guarantee that your personal information will not be used, disclosed or deleted in ways not otherwise described in this Privacy Policy.

9. Accuracy and Access to Personal Information

Canada Drives Group will rely on you to ensure that your personal information that you provide to Canada Drives Group is as accurate, complete and up to date as necessary for the purposes for which Canada Drives Group uses the personal information. You will promptly notify Canada Drives Group of any changes to your personal information using the procedures made available for that purpose by Canada Drives Group or by contacting Canada Drives Group's customer service.

You may reasonably request access to your personal information collected by Canada Drives Group and information about Canada Drives Group's use, disclosure and retention of that personal information by submitting a written request to Canada Drives Group's Chief Privacy Officer using the contact information noted below. Subject to applicable exceptions and limitations prescribed by applicable law, you will be given reasonable access to your personal information and you will be entitled to verify the accuracy and completeness of your personal information and to have the information revised as appropriate. You may be required to pay a reasonable fee for access to your personal information. Canada Drives Group may decline to process a request that is unreasonably repetitive, frivolous, vexatious or impracticable, that infringes or jeopardizes the privacy of other persons, or for other reasons permitted by applicable law.

10. Non-Personal Information

Canada Drives Group creates and collects non-personal information (information that is not about an identifiable individual), including personal information that has been aggregated or otherwise depersonalized so that the information no longer relates to an identifiable individual. Canada Drives Group may use, disclose, transfer and retain non-personal information for any purpose and in any manner whatsoever. If non-personal information is combined with personal information, then Canada Drives Group will treat the combined non-personal information as personal information for the purposes of this Privacy Policy for as long as the non-personal information is combined.

11. Other Websites and Businesses

Canada Drives Group's websites and correspondence (including emails and messages) may include advertisements for products and services (e.g. car sales, personal loans and credit cards) offered by independent businesses (that may have a financial relationship with a Canada Drives Company) or links to websites operated by independent businesses (e.g. car dealers, lenders and credit card providers). Canada Drives Group has no responsibility or liability for, or control over, those other websites, online services or businesses, their products or services, or their collection, use, disclosure or retention of your personal information. This Privacy Policy does not apply to the collection, use, disclosure and retention of your personal information by those websites, online services and independent businesses. If you have questions about how those websites, online services or independent businesses collect, use, disclose or retain personal information, please contact the owner or operator of the website, service or business.

12. Other Matters

(a) Disclaimers, Liability Exclusions/Limitations and Disputes:

The agreements (including any subscription agreement, membership agreement or terms of service or use) that you accept when you apply, register for, order or use Canada Drives Group's products or services contain important provisions, including provisions disclaiming, limiting or excluding the liability of Canada Drives Group and other persons (including service providers) and provisions determining the applicable law and jurisdiction for the resolution of disputes. To the extent permitted by applicable law, each of those provisions applies to any dispute that may arise in relation to this Privacy Policy or Canada Drives Group's collection, use, disclosure and retention of your personal information, and are of the same force and effect as if they had been reproduced directly in this Privacy Policy. Nothing in this Privacy Policy amends any of those other agreements.

(b) Changes to this Policy:

A Canada Drives Company may change this Privacy Policy from time to time by posting a new version of this Privacy Policy on the Canada Drives Company's website. A Canada Drives Company's collection, use, disclosure and retention of your personal information will be governed by the version of this Privacy Policy in effect at that time. Your continued dealings with a Canada Drives Company after any change to this Privacy Policy will signify your consent to the collection, use, disclosure and retention of your personal information as set out in the changed Privacy Policy. Accordingly, you should check the "Last Updated" date of this Privacy Policy (at the top of this Privacy Policy) and review any changes since the last version.

(c) English Language:

You and Canada Drives Group have each expressly requested and required that this Privacy Policy and all other related documents be drawn up in the English language. Les parties conviennent et exigent expressement que cette Politique de Confidentialité et tous les documents qui s'y rapportent soient rédigés en anglais.

(d) Contacting Canada Drives Group's Chief Privacy Officer:

If you have any comments or questions about this Privacy Policy or how Canada Drives Group deals with your personal information, please contact Canada Drives Group's Chief Privacy Officer by mail or email at: Canada Drives Group - Chief Privacy Officer, Suite 600, Two Bentall Centre, 555 Burrard Street, Vancouver, British Columbia, Canada, V7X 1M8; email: privacy@canadadrives.ca.