

Last Updated: June 22nd, 2022.

Your privacy is important to Spring Financial Inc. ("**Spring Financial**"). This Privacy Policy explains how Spring Financial collects, uses, discloses and retains personal information, including information collected by Spring Financial through websites and telephone calls and when providing products or services.

1. Your Consent

By providing Spring Financial with your personal information, you consent to the collection, use, disclosure and retention of that information by Spring Financial 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 Spring Financial, but then you might not be able to proceed with your intended interactions or transactions with Spring Financial or otherwise receive the full benefit of Spring Financial'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 Spring Financial Collects

(a) Information You Provide

You may be asked to voluntarily give your personal information to Spring Financial when you interact, orally, in writing or by electronic transmission, with Spring Financial, including when you apply for an account, subscribe to a newsletter, register to receive information, apply or register for or order a product or service offered by Spring Financial or use a product or service provided by Spring Financial. 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 Spring Financial or otherwise receive the full benefit of the desired product or service. Telephone calls between you and Spring Financial will be recorded to ensure accuracy and quality assurance, and may be disclosed to third parties to verify Spring Financial 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

Spring Financial may automatically collect certain information regarding your use of Spring Financial'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.

Spring Financial's website, online services, email messages and advertisements may use technologies (e.g. cookies, web beacons, tokens, session recording, pixels or tags) to collect information that assists Spring Financial to improve its products, services, customer communications and advertising and to prevent fraud. Spring Financial may use information that it collects through technological means to recognize you as a user of Spring Financial's website or online services, to facilitate and improve your use of Spring Financial's website 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 Spring Financial 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 Spring Financial (e.g. apply for financing or apply for pre-approval for financing), Spring Financial may obtain, and continue to periodically obtain, your credit score and related information from a credit reporting agency to process or fulfill the transaction, and to update your confidential profile for use by Spring Financial for purposes 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 provider of financing 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, making product offers, modifying the terms of your credit agreement, collection on your account, or similar services or products.

(d) Bank Information

When you use the bank account verification system ("Bank Verification System") from within Spring Financial's website, Spring Financial may, in accordance with this Privacy Policy and Spring Financial's General Terms of Service, retrieve your bank account information, including your transaction history (but not your bank account log-in credentials) for purposes as set out in this Privacy Policy. Spring Financial may use the Bank Verification System to periodically obtain your updated bank account information in order to update your confidential profile for use by Spring Financial for purposes as set out in this Privacy Policy.

For clarity, you acknowledge and agree that Spring Financial may periodically retrieve your bank account information and disclose the bank account information to independent businesses, including Spring Financial Companies, or Spring Financial's or Spring Financial Companies' suppliers or service providers, for purposes as set out in this Privacy Policy.

(e) Information Regarding Referred Transactions

If Spring Financial refers you to an independent business (e.g. a lender) for a proposed transaction (e.g. a vehicle loan), then Spring Financial may collect from that independent business information regarding the transaction to update your confidential profile for use by Spring Financial as set out in this Privacy Policy.

4. How Spring Financial Uses Personal Information

(a) General

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

- to administer your relationship with Spring Financial, including to offer and provide you products from Spring Financial and Spring Financial Companies and provide service to any existing products you hold with Spring Financial and Spring Financial Companies and correspond with you regarding those matters;

- to facilitate your interactions and transactions with Spring Financial, 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 Spring Financial 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 Spring Financial;
- to maintain, protect and improve Spring Financial's products and services and to develop new products and services;
- to protect and enforce Spring Financial's legal rights, interests and remedies and to protect the business, operations and customers of Spring Financial or other persons; and
- to assist Spring Financial Companies to collect, use, disclose and retain your personal information in accordance with this Privacy Policy.

(b) Disclosure by Spring Financial

Spring Financial may share your personal information with Spring Financial Companies, and Spring Financial may develop, maintain and share a confidential profile for you for use by each Spring Financial Company to provide information, products and services to you, to facilitate your dealings with each Spring Financial Company and as otherwise set out in this Privacy Policy.

(c) Interest-Based Advertising

Spring Financial 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 Spring Financial’s 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 Spring Financial’s website – to display ads based on the computer’s past access to Spring Financial’s website. 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 Spring Financial Discloses Personal Information

(a) General

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

(b) Specific Consents

Spring Financial may disclose your personal information in accordance with express or implied consents that you give during your interactions and transactions with Spring Financial.

(c) Referred Transactions

If Spring Financial refers you to an independent business (e.g. a lender) for a proposed transaction (e.g. a vehicle loan), then Spring Financial may disclose your personal information (including your credit score that you provided to Spring Financial, bank account information, and related information) to the independent business

to facilitate the proposed transaction. Spring Financial has no 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

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

(e) Law Enforcement/Legal Disclosures

Spring Financial 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. Spring Financial may disclose your personal information to law enforcement agencies or other independent organizations if Spring Financial reasonably believes the disclosure is necessary or appropriate in connection with national security, law enforcement or other issues of public importance, or if Spring Financial reasonably believes the disclosure is necessary or appropriate to protect and enforce Spring Financial's legal rights, interests and remedies or to protect the rights, interests, business, operations or customers of Spring Financial 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 Spring Financial's products or services). Spring Financial has no responsibility or liability for, the use, disclosure or retention of your personal information by the agencies, independent organizations or other persons to whom Spring Financial 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

Spring Financial may disclose your personal information in connection with a proposed or actual business transaction in which Spring Financial is involved (such as a corporate amalgamation, reorganization, merger or acquisition, or the sale or transfer of some or all of Spring Financial's business or assets), but Spring Financial 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

Spring Financial and Spring Financial Companies, and its and their 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 Spring Financial, 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

Spring Financial retains your personal information for the period reasonably necessary for the purposes set out or referenced in this Privacy Policy and to comply with Spring Financial's legal obligations or enforce or protect Spring Financial's legal rights, or a longer period required or permitted by applicable law. Spring Financial will delete or dispose of your personal information when Spring Financial 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

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

9. Accuracy, Access and Deletion of Personal Information

(a) Accuracy

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

(b) Access

You may reasonably request access to your personal information collected by Spring Financial and information about Spring Financial's use, disclosure and retention of that personal information by submitting a written request to Spring Financial's 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.

(c) Deletion

You may request Spring Financial delete your personal information in its possession by submitting a written request to Spring Financial's Privacy Officer using the contact information noted below. Subject to applicable exceptions and limitations prescribed by applicable law, Spring Financial will delete your personal information.

Spring Financial will take appropriate steps to verify the identity of anyone requesting changes to, access to or deletion of the individual's personal information. Spring Financial may decline to process a request to change or access personal information 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

Spring Financial 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. Spring Financial 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 Spring Financial 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

Spring Financial's website and correspondence (including emails and messages) may include advertisements for products and services (e.g. vehicle sales, personal loans and credit cards) offered by independent businesses (that may have a financial relationship with Spring Financial) or links to websites operated by independent businesses (e.g. car dealers, lenders and credit card providers). Spring Financial has no responsibility or liability for 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 directly 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 or terms of service or use) that you accept when you apply, register for, order or use Spring Financial's products or services contain important provisions, including provisions disclaiming, limiting or excluding the liability of Spring Financial and other persons (including Spring Financial Companies and 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 Spring Financial'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:

Spring Financial may change this Privacy Policy from time to time by posting a new version of this Privacy Policy on Spring Financial's website. Spring Financial'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 Spring Financial 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 Spring Financial 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 expressément que cette Politique de Confidentialité et tous les documents qui s'y rapportent soient rédigés en anglais.

(d) Definition:

In this Privacy Policy, "Spring Financial Companies" means collectively Spring Financial's corporate affiliates and parent company. Each of the Spring Financial Companies is referred to as a "Spring Financial Company".

(e) Contacting Spring Financial's Privacy Officer:

If you have any comments or questions about this Privacy Policy or how Spring Financial deals with your personal information, please contact Spring Financial's Privacy Officer by mail or email at: Spring Financial Inc. – Privacy Officer, Suite 505, Two Bentall Centre, 555 Burrard Street, Vancouver, British Columbia, Canada, V7X 1M8; email: privacy@springfinancial.ca.