

FairTrade Financial

PRIVACY POLICY

Effective Date: January 1, 2026

1. Introduction and Scope

FairTrade Financial (“FTF”, the “Company”, “we”, “us”, or “our”) is committed to protecting the privacy and confidentiality of your personal, business, and financial information and operates in strict accordance with Canada’s Personal Information Protection and Electronic Documents Act (PIPEDA). This Privacy Statement applies to the collection, use, or sharing of any personal information collected by FairTrade Financial in the course of conducting its business and 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, or as required by regulation.) FairTrade Financial will not collect, use, or disclose your personal information without your consent, except where required by law, or sell your personal information to third parties.

By providing us with information, you are consenting to the collection, use or sharing of your information as set out in this Privacy Statement.

This Privacy Policy governs the information collected from you and your institution during the course of your use of the Sites and Services, but additional privacy and confidentiality requirements may apply to you as well. You should refer to our Platform Terms of Use Agreement, Master Terms Agreement, and any loan documents for information regarding any additional confidentiality obligations to which you may be subject.

2. Categories of Information the Company May Collect

The Company may collect, store, use, and transfer some or all of the following different categories of information about you and your institution as follows:

- *Personal Information*

This includes any information that personally identifies you as an individual, such as your name, email address, address, phone number, and other information about yourself.

- *Institutional Information*

This includes various characteristics regarding your institution, including, where applicable, certain information regarding the loans your institution originates or is otherwise party to, such as the amount and performance of the loans, loan participations, and loan assignments published for sale, sold, purchased, or managed by your institution on any Site or through any Service, including, as applicable, information about or related to your institution's borrowers or members, which may include confidential information of your borrowers or members, your institution's interests relating to the acquisition of loans, loan participations, or loan assignments, your institution's policies and procedures relating to your management of loans, loan collections, loan servicing, and any other information supplied by your institution.

- *Technical Information*

This may include information about your computer or mobile device and your visits to any Company Site, such as your IP address, your username and password, geographical location, browser type and other software systems, referral source, length of visit, pages viewed, and information that may be obtained and stored on your technical profile through our use of cookies, tracking pixels, or similar technology.

When this technical information is directly associated with Personal Information, such that the technical information can identify you as an individual, this technical information shall be treated as Personal Information.

- *Relationship Information*

This is information we obtain from our interactions with you and your institution and may include details of calls you have made to our sales or customer support teams, site visits made to you by our team, marketing materials you have received, your email communications with our team, information about your preferences for marketing events or other Company events you have attended, your preferences in receiving marketing materials from us, your institution's transactions, purchases, transfers, portfolio of loans and investments (and notices, elections, votes and other actions taken or received with respect thereto), your institution's search for, or analysis of, loans, loan assignments, and loan participations, your interests relating to purchases or sales of loans, loan participations, or loan assignments, and the manner in which your institution administers, manages, purchases, or sells investments or loans.

- *Product Usage Information*

This is information we collect from and during the course of your and your institution's doing business with the Company, including the use of the Sites and Services. This information includes, among other things, when and which Sites or Services you have used, subscribed to, or are enabled or authorized to access, and the content and functionality you have used in connection with any Site or Service. Depending on your use of the Sites and Services, which may include use for loan purchases, originations or sales, assignments, participations, servicing, administrative agency, analytics or other services, Product Usage Information may include information related to transactions, purchases, sales, transfers, investments, distributions, collections, investment returns and other analyses, certain information regarding clients, members, or borrowers, and the management of these items over time.

- *Publicly Available Information*

This includes information we obtain from directories, websites, public records or other media sources.

- *Information Provided by Third Parties*

This includes information we obtain from our business partners or other third parties, including the results of any regulatory screening, and may also include information collected from conference lists and financial services directories.

3. How the Company Uses the Information We Collect

The Company processes the Personal Information, Institutional Information, and other information we collect for the following purposes:

- *Account Administration, Registration, and Setup*

The Company uses Personal Information and Institutional Information in order to register you and your institution with the Company prior to allowing you or your institution to use certain portions of the Sites and Services, as well as for the continued use of the Sites and Services.

The Company may provide your institution with the ability to set up and manage a Company profile that may be available for viewing by other registered users of the Sites and Services.

- *Provision of Products and Services*

The Company uses Personal Information and Institutional Information to maintain the Sites and provide the Services.

The Company also uses Institutional Information, Relationship Information, and Product Usage Information to provide your institution with the ability to share with other registered users information regarding your institution including, as applicable, information about or related to your institution's members' or borrowers' loans, which may include confidential information of your borrowers or members, your institution's policies and procedures relating to your institution's management of loans, loan collections, loan servicing, and other matters related to your and your institution's activity on or through any Site or Service.

- *Sales and Marketing, Product Development, and Improvement*

The Company may from time to time use Personal Information, Relationship Information, Institutional Information, and other information we collect to contact you by email, telephone, mail, or other media with information about the Company, the products, the Sites or Services to which you or your institution are subscribed or otherwise authorized to use, other Company products, Sites, or Services, or conferences and events that might be of interest to you or your institution. The Company may ask you to participate in surveys, questionnaires, telephone calls, or other actions to improve, customize, or enhance Company products, Sites, or Services. In addition, we may use such information with the Personal Information, Institutional Information, Relationship Information, or Product Usage Information of other users of any Sites or Services for statistical purposes, data analysis, error reporting, or to plan or implement developments, improvements, or enhancements to any products, Sites, Services, or range of products, Sites, or Services we offer. If you submit an inquiry to us on our website, by email, by telephone, or in person, we will use Personal Information and Institutional Information you provide to respond to your inquiry and may contact you about other products, Sites, or Services that may be of interest to you or your institution. You may ask us to refrain from contacting you at any time as described under Section 7 ("Your Choices") below.

- *Compliance, Regulatory, and Legal Purposes*

The Company may use Personal Information, Institutional Information, and other information we collect to fulfill legal and regulatory requirements.

4. Security

The Company uses appropriate logical, physical, technical, and organizational measures to protect Personal Information and Institutional Information. These measures include software, systems, and procedures deployed in an effort to provide you with a safe and secure environment for conducting business on any Site or Service. All access to the Company's Sites is encrypted using industry-standard transport layer security technology. We secure the Personal Information and Institutional Information you provide on computer servers in a controlled, secure environment, protected from unauthorized access or use, which are encrypted using industry-standard encryption technology. Additionally, the Company limits access to your Personal Information and Institutional Information to our employees and our agents who need to know such information to provide you with access to Sites, to enable you to use Services, or to run and otherwise operate our business, including the Sites and Services.

No security system is absolutely impenetrable, and we will review, refine, and upgrade security technology as new tools, practices, procedures, and information become available. While the Company strives to protect Personal Information and Institutional Information, the Company cannot ensure and does not guarantee the security of information transmitted to us.

If we determine that a breach of our systems has occurred resulting in unauthorized access to your Personal Information or Institutional Information, we shall, upon discovery of such breach, notify you in the most expedient time possible and without unreasonable delay, consistent with the legitimate needs of law enforcement agencies. The method of providing notice of a breach may vary depending on the number of individuals affected, the cost of providing such notice, and our normal means of communicating with you, but in all instances as guided by the applicable legal requirements. In order to further ensure the safety and security of your Personal Information and Institutional Information, should you become aware or suspect that such Personal Information and Institutional Information has been compromised, you agree to notify us as promptly as practicable so that we may take appropriate action.

All Personal Information and Institutional Information you provide the Company is stored in Canada. By using the Company's Sites and Services you fully understand and unambiguously consent to the storage of such information in Canada.

5. How and When the Company Will Share the Information We Collect

The Company will not disclose your Personal Information or Institutional Information to third parties except as described in the Terms of Use Agreement, this Privacy Policy, or otherwise with your consent.

- *Provision and Operation of the Sites and Services*

The Company may disclose certain Institutional Information to other registered users of the Sites and Services and borrowers, as applicable, as part of the operations of its business. In general, our Sites and Services rely upon and require the disclosure of Personal Information, Institutional Information, Relationship Information, and other information we collect to provide and perform our services, including:

- (i) to communicate with you, your institution, your institution's affiliates, or with other third parties at your or your institution's direction in connection with your institution's account and doing business with the Company;
- (ii) to inform you, depending on the terms of your registration, about which loans are available for sale on any Site, and to notify the applicable parties of origination, purchase, or sale confirmations;
- (iii) to provide information to loan originators, sellers, and/or purchasers, as applicable, about the portfolio of loans, loan assignments, and loan participations sold to other registered users or unregistered third parties at an institution's direction, the purchase, sale, distribution, and receipt of the initial purchase and of loan collections over time, and the administration, management, and historical performance of loans, loan assignments, and loan participations;
- (iv) to share, at your direction, certain information with other registered users about your institution, such as the portfolio of loans, loan assignments, and loan participations sold, the distribution and receipt of your institution's loan collections over time, the administration and performance of your institution's loans, loan assignments, and loan participations held by the recipient of such information, and the aggregate historical performance of such loans;
- (v) to communicate certain anonymized information about your institution with unregistered third parties, at your request, in connection with certain Services, such as placement services;
- (vi) to facilitate by and among lenders and borrowers any notices, elections, votes, or other similar actions taken; and
- (vii) to communicate with lenders or borrowers regarding invitations to view loans, requests for data room access, requests for voting, modification of loan terms, and requests to verify bank accounts and sub-user accounts, among other matters in the administration and performance of the Company's operations through any Site or Service.

- *User Forums, Blogs, and Chat Services*

If you use any bulletin board, blog, or chat room on any Site, you should be aware that any information you submit may be read, collected, or used by other users of these forums. The Company is not responsible for the information you choose to submit in these forums.

- *Third Party Service Providers*

To provide you with quality service, the Company may also disclose certain Personal Information, Institutional Information, and other information we collect to third party service providers. The Company uses third party service providers to facilitate the operation of the Sites and Services. The Company also uses service providers to perform email marketing, promotional, and other services on the Company's behalf.

The Company may from time to time enter into joint ventures, distribution agreements, and other relationships with third parties, which may require the disclosure of certain Personal Information and other information we collect as part of these agreements. We seek to limit the information provided to our third party service providers to only the information needed to perform the contracted-for task.

Where the Company engages technology or service providers, including its strategic marketplace technology partner, such service providers act on behalf of FairTrade Financial and are contractually required to protect Personal Information and Institutional Information in accordance with applicable privacy laws.

- *Legal and Compliance*

The Company may also share your Personal Information and Institutional Information if it reasonably believes that it is required by law, to enforce the Terms of Use Agreement, protect and defend our rights or property, or comply with a court order, warrant, subpoena, or any other legal or regulatory requirement of any governmental authority.

Your Personal Information and Institutional Information may be transferred to a third party as a result of a sale, including a sale of all or substantially all of the Company's assets, acquisition, merger, reorganization, or other similar transaction involving the Company. We reserve the right to transfer the information to a third party in connection with any such transaction.

- *Transfer within Companies*

The Company may also transfer Personal Information, Institutional Information, and any other information we collect to any parent entity, any wholly-owned subsidiary of the Company, or any wholly-owned subsidiary of any parent entity.

6. Cookies, Tracking Pixels, Clear GIFs, and Other Collection Technologies and Methods

In the operation or provision of any Site or Service, when you request products, services, or other information from us, respond to surveys, or otherwise interact with us, we may use a variety of technologies such as internet log files, cookies, tracking pixels, clear GIFs, or other technologies to enhance the functionality of such Site or Service or otherwise engage with or respond to you.

An internet “cookie” is a small text file created by a web site that stores information on your computer, such as your preferences when visiting that site. Among other matters, we may use cookies to enable you to use Sites and Services. They are also important for ensuring smooth transitions between webpages within and among Sites.

If you choose to block the Company from using cookies in connection with your use of any Site or Service, you will adversely affect your ability to use and access certain portions of Sites or use certain Services.

A clear GIF is a small graphic placed on a web page, web-based document, or in an internet-based communication (such as email). Clear GIFs are invisible to the user because they are small and usually the same color as the web page, document, or communication. We may use clear GIFs to, among other things, collect Personal Information or Product Usage Information, to ensure smooth transitions between webpages within and among the Sites, and for other uses as described in this Privacy Policy.

A tracking pixel is a small graphic which is loaded when a user visits a website or engages with an internet-based communication (such as email). We may use tracking pixels to collect information that enables us to communicate with you more efficiently and effectively.

7. Your Choices

FairTrade Financial has designated an internal Privacy Officer who is accountable for the Company's compliance with applicable privacy legislation, including the Personal Information Protection and Electronic Documents Act (Canada) (PIPEDA). All privacy-related inquiries, requests, or complaints may be directed and addressed to the Privacy Officer at admin@fairtradefinancial.ca. You may request access to, correction of, or removal of your Personal Information, and if you are the primary account holder for your institution, your Institutional Information, by contacting us at admin@fairtradefinancial.ca you're your request addressed to the Privacy Officer. The Company will make commercially reasonable efforts to remove your Personal Information and Institutional Information, as applicable, from our databases. In some cases, we may not be able to remove all of your Personal Information or Institutional Information and, should that occur, we will make commercially reasonable efforts to advise you of our inability to remove such information. You may also request that we stop using your Personal Information for marketing purposes or if any of your contact details are incorrect, by contacting us at admin@fairtradefinancial.ca, addressed to the Privacy Officer.

In the event you are no longer a registered user of the Sites and Services, to the extent we retain any of your Personal Information, we will handle your information in the same manner as currently registered users.

8. Changes to This Policy and Your Duty to Inform Us of Changes

The Company reserves the right, in its sole discretion, to modify, amend, or otherwise change this Privacy Policy from time to time. We will indicate at the top of this Privacy Policy when it was most recently updated. We will notify registered users of material changes to this Privacy Policy and the effective date of the changes by posting the revised Privacy Policy to Sites or by sending you an email notification. You agree that the posting of a revised Privacy Policy and your continuing to access any Site constitutes acceptance of the revised policy. You are encouraged to review this Privacy Policy regularly to stay informed about our information practices and the choices available to you.

We seek to prevent unauthorized access to your Personal Information and Institutional Information. Central to this effort is ensuring that the information the Company has about you and your institution is accurate and current.

You are responsible for ensuring the accuracy of the information collected by us about you and your institution. If at any time you discover inaccuracies in our information or if your Personal Information or Institutional Information changes, please immediately inform us of any inaccuracy or change by, to the extent possible, updating that information through a Site, and if it is not possible to update through any Site, then by emailing us at admin@fairtradefinancial.ca

9. Links to Other Websites

Sites may contain links to other internet web sites that were developed, operated, sponsored or maintained by third parties. Third party internet sites and services accessible through a Site will have their own privacy and data collection policies and practices, which are independent from those maintained by the Company. The Company has no responsibility or liability for these other internet web sites or their independent policies or actions.

10. Supremacy of Platform Terms of Use Agreement

This Privacy Policy does not supersede the Platform Terms of Use Agreement that governs your use of any Site or Service. In the event of any conflict between the Terms of Use Agreement and this Privacy Policy, the Terms of Use Agreement shall control and govern.