

SA Financial Privacy Policy

SA Financial Corp. and Summit Acceptance Limited Partnership, by its General Partner Summit Acceptance Corp. (“SA Financial”, “we”, “our”, or “us”, as applicable) provide loan and lease products to customers of varying credit profiles. In connection with our activities, we own and operate the website as available through www.mysafinancial.com, and any other websites or platforms that link to this Privacy Policy (collectively, the “Platform”). We also provide certain communications and services in connection with your access to and use of the Platform (the “Services”).

We are committed to protecting the privacy of your personal information. This Privacy Policy describes the way that we collect, use, and disclose your personal information in connection with your access to and use of the Platform and Services. We will only collect, use, and disclose your personal information in accordance with this Privacy Policy unless otherwise required by applicable law.

By accessing or using the Platform or Services, you signify your acceptance of this Privacy Policy and consent to our collection, use, and disclosure of your personal information as described in this Privacy Policy. You can withdraw your consent at any time by contacting our Privacy Officer using the details below; however, if you choose to withdraw your consent, we may not be able to provide you with access to or use of certain functionality or features of the Platform and Services.

APPLICATION OF THIS PRIVACY POLICY

SA Financial is subject to the *Personal Information Protection and Electronic Documents Act* (Canada) and applicable Canadian provincial privacy legislation. Privacy laws vary by jurisdiction. You acknowledge and agree that access to the Platform and Services are provided via the Internet and that your information, including personal information, may be: (i) transferred across provincial and national borders; and (ii) stored or processed in accordance with the terms and conditions of this Privacy Policy.

This Privacy Policy has a limited scope and application, and the Platform is intended for use in Canada only. Consequently, the rights and obligations contained in this Privacy Policy may not be consistent with privacy requirements for all jurisdictions, and users from other jurisdictions acknowledge that their use of the Platform and the Services is at their own risk.

MINORS

Our Platform is not intended for minors. We do not knowingly collect personal information from minors. If you are a minor, do not use our Platform or Services or provide any information about yourself to us. If we learn we have collected or received personal information from a minor, we will delete that information and any accounts associated with the minor. If you believe we might have any personal information from or about a minor, please contact our Privacy Officer using the details below.

CHANGES TO THIS PRIVACY POLICY

We may make changes to this Privacy Policy from time to time to reflect changes in our legal or regulatory obligations or in the manner in which we deal with your personal information. We will post any revised version of this Privacy Policy on our Platform; we encourage you to check back often for updates. Your

continued use of the Platform after an update or amendment to this Privacy Policy means that you consent to the collection, use, and disclosure of your personal information as described in the updated Privacy Policy.

PERSONAL INFORMATION

For the purposes of this Privacy Policy, “**personal information**” means any information about an individual or that identifies a specific individual.

INFORMATION WE COLLECT ABOUT YOU

We collect and maintain different types of personal information in respect of the individuals with whom we interact. This personal information may include, but is not limited to:

- your personal contact and identification information, such as your name, mailing address, email address, IP address, and phone number;
- your personal, employment, and financial information that you provide as part of a credit application or loan agreement, such as your social insurance number, date of birth, employer, income, and mortgage details;
- your credit information from credit reporting and collection agencies, financial institutions, and other third parties as part of a credit application or loan agreement, such as your credit score and credit history; and
- your personal information that you include in any feedback or communication that you provide to us.

We may also collect information related to your visit to our Platform, including the device (such as hardware model, firmware versions and unique device identifiers), device-specific telemetry data (such as operational and diagnostic logs), device domain used to access our Platform, the operating system on your device, your device settings, application IDs, the type and version of your browser, crash data, other unique device identifiers, the website you came from to access our Platform, the page of our Platform you entered and exited at, any page within our Platform that is viewed by your IP address, and what country you are from. We use this information to monitor our Platform’s performance (such as number of visits, average time spent, page views, etc.) and for our business purposes (such as working to continually upgrade our Platform).

HOW WE COLLECT YOUR INFORMATION

We typically directly ask for your consent to collect, use, or disclose your personal information. However, your consent also may be implied or implicit through your conduct when it is reasonable and legally permissible for us to do so (for example, your credit score and history when you complete a credit application). We will not require you to consent to the collection, use, or disclosure of your personal information beyond that which we require for our purposes.

You may withdraw or change your consent at any time by giving us reasonable notice and subject to our compliance with legal obligations. In appropriate cases, we will inform you of any implications of

withdrawing your consent. However, we reserve the right to collect, use, and disclose your personal information without your knowledge or consent where we are legally required or permitted to do so when, for example, investigating fraud or other contravention of law or acting in respect of an emergency that threatens you.

HOW WE USE YOUR INFORMATION

We collect personal information to provide you with the Services that are available on and through our Platform and which enables us to manage, maintain, and develop our operations. For example, we collect personal information:

- to establish, maintain, and manage our relationship with you, including by contacting you, so that we may provide you with any services or communications that you have requested;
- to allow you to participate in, subscribe to, or otherwise receive services and communications from us;
- to evaluate your credit or lease application, including to assess and update your creditworthiness on an ongoing basis;
- to monitor, record, and determine your obligations in connection with your execution of any financing or lease agreements with us;
- to provide you with information about our organization;
- to be able to comply with your requests (e.g., if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number);
- to carry out our obligations and enforce our rights arising from any agreements with you;
- to fulfill the purposes for which you provided the information, the purposes that were described when the information was collected, or any other purpose for which you provide the information;
- to conduct analysis and evaluations to understand usage and trends to improve our Platform, Services, communications, and operations;
- to protect us against error, fraud, theft, and damage to our Platform, Services, assets, or other properties;
- for any other purposes authorized or required by law; and
- for any other reasonable purpose of which we may notify you or to which you consent.

By consenting to the collection, use, and disclosure of your personal information through our Platform, you allow us to fulfill the purposes for which we collect your personal information. When we collect your personal information for research, statistical, and development purposes, we ensure that any information used for our analysis and reports will be de-identified and aggregated in a manner that will not identify you. This de-identified information may be disclosed to third parties.

MARKETING AND TRANSACTIONAL COMMUNICATIONS

We will collect your express consent prior to sending you any marketing communications, unless an exception to obtaining your opt-in consent applies under Canada's Anti-Spam Legislation (CASL). You will have the opportunity to opt out of receiving marketing communications at any time. For clarity, by using and accessing our Platform, you agree to receive transactional communications about your activities on or in connection with the Platform. For example, when you contact us using our contact form, you may receive an email confirming our receipt of your message.

HOW WE SHARE YOUR INFORMATION

We may disclose or otherwise share your personal information and information about your visit to our Platform to the following persons or in the following circumstances:

- **To Affiliates, Employees, and Service Providers.** We may disclose your personal information to our affiliates, dealership partners (as listed at www.mysafinancial.com/partners), and our respective employees, contractors, consultants, service providers, and other parties who require such information to assist us with managing our relationship with you, including third parties that provide services to us or on our behalf. These third parties are contractually obligated to protect the privacy of your personal information in accordance with this Privacy Policy, and they may send you communications on our behalf.
- **To Credit Bureaus, Credit Reporting Agencies, and Other Financial Institutions.** We may disclose your personal information to credit bureaus, credit reporting agencies, financial institutions, your creditors, and other third parties to determine and update your creditworthiness on an ongoing basis and to obtain credit references.
- **For Business Transactions.** Personal information may also be disclosed or transferred to another party during the course of, or upon completion of, a change in ownership of, or the grant of a security interest in, all or a part of SA Financial or its affiliates through, for example, an asset or share sale or some other form of business combination, merger, or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Privacy Policy, unless you consent otherwise.
- **For Legal Requirements.** Your personal information may also be disclosed:
 - as permitted or required by applicable law or regulatory requirements;
 - to comply with valid legal processes, such as search warrants, subpoenas, or court orders;
 - as part of Greyter's regular reporting activities under applicable law;
 - during emergency situations or where necessary to protect the safety of a person or group of persons; and
 - for any additional purposes for which we have obtained your consent to disclose your personal information.

Since we may share your personal information with third parties, as described in this Privacy Policy, your personal information may be collected, used, processed, stored, or disclosed outside of your jurisdiction of residence, including in Canada and the United States. As such, your personal information may potentially be accessible to law enforcement and national security authorities of another jurisdiction where local laws provide for a different level of protection for personal information. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security agencies in those other countries may be entitled to access your personal information.

If you would like further information about our policies and practices regarding the third parties (including our service providers that may be located outside of your jurisdiction of residence) with whom we disclose your personal information and how these third parties collect, use, disclose, and store personal information, please contact our Privacy Officer using the contact details below.

By providing your personal information to us, you consent to our disclosure of this information to our service providers (and other third parties) as described in this Privacy Policy, including those that may be located outside of your jurisdiction of residence.

COOKIES

As you navigate through and interact with our Platform, we may use cookies or other automatic data collection technologies to gather certain information about your visit, browsing actions, and patterns to distinguish you from other visitors, measure the effectiveness of our Platform and advertising, and personalize your visit to our Platform.

A cookie is a small file that is stored on your computer or mobile device by a website in order to remember information about your browsing history or your device when you return to that website. Some cookies are “session cookies” that are deleted at the end of your browsing session, while some are “persistent cookies” that remain between sessions until they expire or you delete them. Similar tracking technologies are pixels, web beacons, or other technologies that store or access information on your computer or device.

Using cookies, we may collect the following personal information about your visit to our Platform: your Internet Protocol (IP) address and the general geographic location associated with your IP address (known as IP geolocation); information about your computer or mobile device such as your browser type; the full Uniform Resource Locators (URL) clickstream to, through, and from our Platform; the date, time, and duration of your visit; whether you are a first-time or returning visitor; content you viewed and searched; recorded images such as forms you populated; and your interests and demographics.

We use third-party analytics, including Google Analytics, to create statistics and generate reports about visits to our Platform. For information on how Google Analytics collects and processes your data, please see [“How Google uses data when you use our partners’ sites and apps”](#).

You may disable cookies in your browser settings and clear your cache of previously installed cookies. However, if you disable cookies, our Platform may not function properly, and your customized use of our Platform may be hindered. In addition to disabling cookies, you may also install the Google Analytics opt-

out browser add-on, which prevents Google Analytics from collecting information about your website visits.

SECURITY SAFEGUARDS

The security of your personal information is very important to us. We use commercially reasonable physical, electronic, and administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to the Platform. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Platform.

Please advise our Privacy Officer immediately of any incident involving the loss of, or unauthorized access to or disclosure of, personal information that is in our custody or control.

RETAINING YOUR INFORMATION

We do not keep your personal information forever. We keep your personal information until the purposes for which it has been collected have been fulfilled, or for such other period as may be required by law, whichever is longer.

ACCESS AND UPDATES TO YOUR INFORMATION

It is important that the personal information we hold about you is accurate and current. You have the right to request access to and to correct the personal information that we hold about you.

If you want to review, verify, correct, or withdraw consent to the collection, use, and disclosure of your personal information, you may also send an email to our Privacy Officer using the details below to request access to, correct, or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

We may request specific information from you to: (i) help us confirm your identity and your right to access the Platform and Services; (ii) provide you with the personal information that we hold about you; and (iii) make your requested changes to your personal information. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you or which we may have destroyed, erased, or made anonymous in accordance with our record retention obligations and practices. If we cannot provide you with access to your personal information, we will inform you of the reasons, subject to any legal or regulatory restrictions. If you are concerned about our response or would like to correct the information provided, you may contact our Privacy Officer using the details below.

CHALLENGING COMPLIANCE

Upon your request, we will provide you with information about our procedures for addressing any complaints about our compliance with privacy laws. We will investigate all written complaints, and if we find a complaint to be justified, we will take any appropriate measures, including amending this Privacy Policy and our internal practices.

To submit a request, please contact our Privacy Officer using the details below.

INTERPRETATION OF THIS PRIVACY POLICY

This Privacy Policy does not create or confer upon any individual any rights or impose upon SA Financial any rights or obligations outside of, or in addition to, any rights or obligations imposed by Canada's federal and provincial privacy laws, as applicable. Should there be, in a specific case, any inconsistency between this Privacy Policy and Canada's federal or provincial privacy laws, as applicable, this Privacy Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.

CONTACT US

If you have any questions or concerns regarding this Privacy Policy or our privacy practices, please contact our Privacy Officer at:

Email: privacyofficer@mysafinancial.com
Mail: 1260 Highfield Cres. SE, Calgary, Alberta, T2S 5M3
Attention: Privacy Officer

Last modified: November 14, 2024