

## Privacy Policy

This Privacy Policy describes how Fora Credit Inc. (“**Fora**”, “**we**”, “**us**” or “**our**”) collects, uses and discloses personal information in the course of our commercial activities in Canada, including personal information collected during the application process, if you have a Fora account and/or when you visit our website at [www.foracredit.ca](http://www.foracredit.ca) or any websites that link to this Privacy Policy (“**Site**”). “**Personal information**” means information about an identifiable individual.

### **PERSONAL INFORMATION WE COLLECT**

We collect and receive certain information about you when you inquire or apply for a credit product from Fora on our Site or any websites that may re-direct you to our Site, or otherwise interact with us, including through social media. What we receive, and how we receive it, in part, depends on what you do when you visit the Site.

We may collect the following information about you:

- Contact information, such as your name, email address, residential address, and phone number;
- Information to verify your identity, such as your date of birth, government-issued identification (only if necessary), and social insurance number (optional);
- Financial and credit-related information, such as your income, employment, and banking details;
- Information we receive from third parties, such as information obtained from financial institutions or consumer reporting agencies relating to your initial and on-going creditworthiness;
- Browsing activity including internet protocol (IP) address, internet browser information, device type and operating system, and date, time and duration of your visit to the Site;
- Documentation, such as a utility bill, bank statement, void cheque, etc., to supplement the above information, as applicable;
- Any other information required by law.

Your choice to provide your personal information, including the type of information you provide, is entirely optional. You may choose to provide all or only some of the information requested. However, if you decline to provide certain information, you may not be able to use all of our services or be approved for a Line of Credit from Fora.

You are not required to consent to the collection, use or disclosure of personal information beyond that which is outlined in this Privacy Policy and as required by law. If we wish to use your information for a purpose that is not disclosed at the time of the initial consent, consent will be obtained before your information is used for this new purpose unless otherwise permitted or required by law.

### **WHY WE COLLECT YOUR PERSONAL INFORMATION**

We may collect, use and disclose your personal information in order to:

- Communicate with you during the application process and/or if you have a Fora account;
- Verify/authenticate your identity;
- Consider and adjudicate your application for a Line of Credit from Fora;
- Service your Fora account (e.g. payment history, communication preferences, browsing activity while on the Site);
- Provide legally required disclosures, as applicable;
- Detect and prevent fraudulent activity and help safeguard information (e.g. reviewing and analyzing transactions on your account to help us identify various risks, including credit risks, fraud and money laundering);
- Maintain adequate business and other records, as required by law;
- Assess the quality of our products and services, including for training purposes (e.g. call recordings, responding to consumer feedback);
- Collect any debt that may be owed to Fora;
- Improve our products and services and our Site;
- Provide you with information that you request or otherwise respond to your requests, inquiries or complaints;
- Generate anonymous and aggregate data and statistics;
- Customize, tailor, send and deliver marketing and promotional information, if applicable.

## **WHEN WE SHARE YOUR PERSONAL INFORMATION**

**Service Providers.** We may share your personal information with service providers (including affiliates acting in this capacity) who provide services on our behalf, including identity verification, data hosting and processing, underwriting services, marketing, analytics, payment processing, bank verification, call center and similar services.

**Consumer Reporting Agencies.** We disclose personal information, including information about your Line of Credit from Fora, to consumer reporting agencies, including credit reporting agencies, for the purposes of maintaining the accuracy of the credit reporting system.

**Business Transactions.** We may disclose your personal information in connection with a proposed or actual business transaction involving some or all of our business or assets.

**Other.** We may disclose your personal information in other circumstances where required or permitted by law, such as to protect our rights, collect a debt owed to us, or comply with a production order or lawful request from law enforcement or government authorities, including outside of Canada.

**Anonymous Data.** We may use your personal information to generate aggregate or anonymous information regarding the visitors to the Site, traffic patterns, and Site usage and may share this aggregate or anonymous information with our partners and/or affiliates.

## **ACCURACY OF PERSONAL INFORMATION**

We strive to maintain the accuracy of any personal information that may be collected from you and will use commercially reasonable efforts to respond promptly to update our records when you tell us

there is an update to your information. It is your responsibility to ensure that such information is accurate, complete and up to date. If you wish to make any changes to your personal information you have provided to us, you may do so at any time by calling us at [1-888-899-FORA](tel:1-888-899-FORA) or emailing us at [service@foracredit.ca](mailto:service@foracredit.ca).

## **SAFEGUARDING YOUR PERSONAL INFORMATION**

We maintain standard physical, electronic and procedural safeguards designed to protect your personal information from loss, theft, unauthorized access, destruction, misuse, and modification. Personal information is maintained on our servers or those of our affiliates or service providers. Only our employees, representatives, and agents who require access to your personal information for the purposes described in this Privacy Policy will have access.

Your personal information may be processed by us, our affiliates or approved third-party service providers within the United States. We also use cloud solutions to store your personal information that are based in the United States. We incorporate industry standard security and protection practices to ensure your information is secure regardless of where your information is stored.

In addition, we use standard safeguards to monitor the information security practices of third parties with whom we share any personal information.

Please note that despite these measures, no safeguarding, security procedure, or security program is 100% secure, and thus we cannot guarantee the absolute security of your personal or other information.

If you contact or interact with us through email or social media (if applicable), you should not provide any sensitive personal information, such as your banking information, as these channels are not secure. If someone 'representing' Fora contacts you and requests your personal or financial information, you should contact us to confirm the request is legitimate before providing such information.

## **DIGITAL AND ONLINE INFORMATION**

When you interact with our Site, we may use cookies, web beacons, and various other technologies to receive and store information, including your internet protocol (IP) address, internet browser information, device type and operating system, and date, time and duration of the visit to the Site. We also collect your web address and browser information when our content is presented on another website or on a mobile application, as applicable.

**Cookies.** Cookies are small data files that are delivered to a web browser by a web server. Cookies help us understand how you interact with our Site. We may keep track of your browsing activities, including collecting information about your visits to the Site and your interaction with our ads and content on other websites.

Generally, web browsers automatically accept cookies by default. At any time, you can adjust your browser preferences to selectively accept cookies or to refuse all cookies. However, some Site

features or services may not function properly without cookies and the efficiency of the Site may be impacted.

**Web Beacons.** We use web beacons, also known as pixel tags, alone or in conjunction with cookies to compile information about your usage of the Site. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular website tied to the web beacon, and a description of a website tied to the web beacon. We use web beacons to operate and improve our Site and email communications and to analyze the performance of our marketing campaigns. We may use information from web beacons in combination with data about users in general to provide you with information about us.

**Interest-Based Advertising.** Interest-based advertising, also known as online behavioral advertising, uses information collected across multiple websites that you visit in order to help predict your preferences and show you advertisements that are more likely to be of interest to you. Third parties, including service providers, use cookies and other tracking technologies to collect information about your online activities over time and across different websites, including when you visit our Site. We use this information to provide relevant marketing to you when you visit our Site or third-party websites. We also use third-party web beacons on our Site and on other sites to assist in managing and optimizing our online advertising.

In providing interest-based advertising, we follow the cross-industry Self-Regulatory Principles for Online Behavioral Advertising managed by the [Digital Advertising Alliance](#).

If you choose to opt out of interest-based advertising, a cookie will be placed on your browser indicating your choice. Because cookies are stored by your browser, any opt-out election you make is valid only for the computer/browser combination used to opt out. Please note that even if you opt out of interest-based advertising, you may still receive advertisements from us, but they will not be customized based on your online browsing activities. Clearing your browser's cookies will remove your opt-out since it is stored in a cookie, and you will need to opt out again.

**Google Analytics™ Service.** The Google Analytics™ service uses cookies to help understand how our Sites are used, including the number of visitors, the websites from which visitors have navigated to our Sites, and the pages on our Sites to which visitors navigate. This information is used by us to improve our Sites. We may also serve ads over time based on your prior visits to our Site and other websites. For more information on the Google Analytics™ service, click [here](#). For Google's privacy practices, click [here](#). You may opt out of Google Analytics by visiting the Google Analytics opt-out page [here](#).

**Site Usage Information.** We collect Site usage information through a third-party service provider. The information includes, but it is not limited to, clicks, taps and scrolling behavior, web pages viewed, session duration, time to submit or abandon a web form, and others. Any personal information provided will be masked.

**Do Not Track Signals.** At this time, we do not respond to do not track signals.

## UPDATING YOUR CONSENT

Subject to applicable legal or contractual restrictions, you can, with reasonable notice to Fora, withdraw your consent for use and disclosure of your personal information, other than that which is required for us to maintain and service your Line of Credit from Fora.

You can request that we don't contact you by email, phone calls and/or text messages for marketing and promotional purposes, however, withdrawing your consent in any of these instances may result in you missing out on offers specific to your account, such as credit limit increases, as applicable. You can also opt out of receiving account-related text messages.

**Account-Related and/or Marketing and Promotional Text Messages.** You may, at any time, opt-out from receiving account-related and/or marketing and promotional text messages by:

1. Replying to a text message we have sent you in which you wish to opt out of with the word "STOP"; or
2. Updating your communication preferences in your online [account](#).

**Marketing Emails.** You may, at any time, opt-out of receiving marketing and promotional emails by clicking the Unsubscribe Preferences link at the bottom of those emails and updating your preferences.

**Marketing and Promotional Phone Calls.** You may, at any time, opt-out of receiving marketing and promotional phone calls by updating your communication preferences in your online [account](#).

## YOUR RIGHTS REGARDING YOUR PERSONAL INFORMATION

You have the right to request access to or correction of your personal information in our control, to request an explanation of how we have handled that information, and in certain circumstances, to request that your personal information be deleted. These rights are subject to applicable legal restrictions. We may take steps to verify your identity before responding to your request. To exercise any of these rights, please contact our Privacy Officer using the contact information in the Contact Us section below.

## HOW LONG WE KEEP THE INFORMATION WE COLLECT

Fora limits the length of time we retain personal information to what is necessary to fulfill the purposes for which the information was collected, and to comply with legislative and regulatory requirements with respect to data retention. When your information is no longer required to be retained, it is confidentially destroyed, deleted, or anonymized, as appropriate.

## UPDATES TO THE PRIVACY POLICY

We may revise the Privacy Policy from time to time and post any revised Privacy Policy on our Site.

## **CONTACT US**

Fora has appointed a Privacy Officer to oversee compliance with this Privacy Policy and applicable privacy laws. Any questions or concerns regarding the Privacy Policy or the handling of personal information by Fora can be addressed directly to the Privacy Officer at:

Privacy Officer, Fora Credit Inc.

Address: PO Box 17071, Toronto, RPO Yonge-King, ON M5E 1Y2

Email: [privacy@foracredit.ca](mailto:privacy@foracredit.ca)