



Privacy Policy

INTRODUCTION

Insta Chèques® understands that privacy is a critical issue for all customers and is committed to protecting customer personal information. We want to earn our customers' trust by providing safeguards to protect personal information as we continue to provide valuable products and services.

Insta Chèques' Privacy Policy is designed to comply with Canada's *Federal Personal Information Protection and Electronic Documents Act* including the ten principles set out in the National Canadian Standards Association: Model Code for the Protection of Personal Information, Alberta's *Personal Information Protection Act*, and British Columbia's *Personal Information Protection Act*. These guidelines have been customized to meet the specific needs and expectations of Insta Chèques customers.

Insta Chèques will continue to review this Privacy Policy to ensure it remains current with changing laws and regulations while meeting the evolving needs of its customers. In the event of any amendment to the Privacy Policy, a notice will be posted on instacheques.ca or at each Insta Chèques branch.

DEFINITIONS

Collection

The act of gathering, acquiring, recording, or obtaining personal information from any source, including third parties, by any means.

Consent

Voluntary agreement with the collection, use and disclosure of personal information for defined purposes.

Customer

An individual who uses, or applies to use, Insta Chèques' products or services.

Disclosure

Making personal information available to others outside of Insta Chèques.

Personal Information

This covers information and records about an identifiable individual, such as home address, home telephone number, birth date, Social Insurance Number, credit reports, and transactions with Insta Chèques. Personal information does not include business contact information such as the individual's name, title, business address, or business telephone number, business fax number or business email address.

Personal Information Protection and Electronic Documents Act (PIPEDA)

Federal legislation that governs the collection, use and disclosure of personal information in the course of commercial activities.

Record

A record of information is in any form or medium, whether written, printed, photographic or electronic form or any other form.

Third Party

An individual or organization outside of Insta Chèques, including those located in the United States of America ("USA") and Europe.

Use

The treatment, handling, and management of personal information by and within Insta Chèques.

ACCOUNTABILITY

Insta Chèques is responsible for personal information under its control and has designated individuals to be accountable for Insta Chèques' compliance.

Insta Chèques has appointed an individual to be the Privacy Officer, who is accountable overall for compliance with the Privacy Policy. On a day-to-day basis, the collection and processing of personal information is delegated to other employees within Insta Chèques.

Insta Chèques is responsible for personal information in its possession or control and will use reasonable means to provide a proper level of protection for personal information, including when personal information is being processed by a third party.

Insta Chèques will disclose the title of the person(s) designated to oversee compliance with the Privacy Policy upon request.

Insta Chèques continues to develop and refine policies and procedures to protect personal information, receive and respond to complaints and inquires, train employees and communicate this information to customers.

IDENTIFYING PURPOSES

Insta Chèques will identify the purposes for which personal information is collected at or before the time the information is collected. This information may be communicated orally, electronically or in writing.

Insta Chèques collects, uses and discloses personal information for the following purposes:

- To provide financial services to customers;
- To develop, manage and market products and services to meet the needs of customers;
- To obtain credit information and credit reports from credit reporting agencies to assess credit history and credit worthiness and to confirm accuracy of information provided by individuals;
- To confirm details of customer employment;
- To contact customers for products and services that may be of interest;
- To determine the eligibility of customers for different products and services that may be of interest;
- To extract certain information for the purpose of generating statistics for our internal purposes;
- To ensure a high standard of service to customers;
- To record, track and respond to customer feedback and complaints;
- To meet legal and regulatory requirements;
- To confirm the identity of a customer;
- To collect debt that may become owed to Insta Chèques by a customer;
- To evaluate, complete, or otherwise as part of business transactions involving Insta Chèques; and
- To facilitate verification of transactions by third parties,

as part of business transactions involving Insta Chèques. Insta Chèques will identify any new purpose(s) for which personal information is being collected, used or disclosed. Customers will be informed by either posting a notice on the Insta Chèques website (www.instacheques.ca), written notification or direct communication.

CONSENT

Notice will be given and consent obtained when collecting, using and disclosing personal information, except when deemed inappropriate.

Insta Chèques will make a reasonable effort to ensure that all customers have an understanding of the purpose(s) for which personal information is collected, used or disclosed.

Insta Chèques will obtain consent to use and disclose personal information at the time the personal information is collected. Insta Chèques may also obtain consent to use and disclose personal information after it has been collected, but prior to the personal information being used or disclosed for a new purpose.

Consent shall not be obtained through deception. An individual's consent may be explicit or implied. Consent can be given either orally, electronically or in writing. Use of products and services offered by Insta Chèques constitutes implied consent for the collection, use and disclosure of personal information for all identified purposes.

Insta Chèques may collect, use or disclose personal information without the individual's knowledge and consent in certain circumstances. For example:

- When the collection, use, and disclosure is permitted or required by law;
- When the collection, use, and disclosure is clearly in the interests of the individual and consent cannot be obtained in a timely manner;
- When seeking the consent of the individual may defeat the purpose of collecting the information;
- When use of the information is for an emergency that threatens the life, health or security of an individual;
- When needed to collect a debt, to comply with a subpoena, warrant or other court order, or as otherwise required or authorized by law;
- When the information is solely for Journalistic, Artistic, or Literary Intent; or
- When the information is publicly available.

An individual may withdraw consent at any time subject to legal or contractual restrictions and reasonable notice. Refusal or withdrawal of consent by a customer may prevent Insta Chèques from providing a product or service to that customer. Insta Chèques will not unreasonably withhold products or services from a customer who refuses or withdraws consent, but if the personal information is required to offer the product or service, Insta Chèques may

decline to deal with the customer who will not consent to the use of such personal information. Insta Chèques maybe contacted for more information regarding the method by which consent can be withdrawn.

LIMITING COLLECTION

The collection of personal information is limited to that which is related to the identified purposes.

Personal information will be collected by fair and lawful means. Most personal information will be collected directly from employees and customers.

Insta Chèques may collect personal information from sources such as credit bureaus, employers, personal references, or other third parties that represent they have the right to disclose such personal information.

LIMITING USE, DISCLOSURE AND RETENTION

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law.

Insta Chèques shares and stores customer personal and transaction information with affiliated companies of Insta Chèques located in the USA for the purposes listed in the Identifying Purposes section above and Insta Chèques keeps track of customer feedback and complaints utilizing a third party service provider whose servers are located in Europe. In addition, Insta Chèques may use and disclose personal information to third parties as follows:

- An Insta Chèques affiliate seeking information as an agent of the individual;
- An Insta Chèques agent that will evaluate the customer's creditworthiness or to collect a potential debt;
- A credit reporting agency to obtain credit information and credit reports to assess credit history and credit worthiness and to confirm accuracy of information;
- The issuer and/or payer of negotiable items to confirm identity;
- A third party – where individual consents to collection, use, and disclosure by Insta Chèques and the third party;
- A third party – where disclosure is required by law;
- A public authority or agent of a public authority where there is imminent danger to the life or property of an individual which could be avoided or minimized by disclosure; and
- Conduct surveys in order to enhance our products and services to meet customer needs.

Where personal information is disclosed to a third party, Insta Chèques will ensure that appropriate security measures are utilized to protect the use and disclosure of personal information.

Only Insta Chèques employees are authorized or granted access to personal information about customers when responsibilities reasonably require.

Insta Chèques will retain personal information only as long as necessary for the fulfillment of identified purpose, or as required by law.

ACCURACY

Reasonable efforts will be made to ensure that personal information is as accurate, complete and up-to-date as is necessary for the purposes for which it is used.

Due to the nature of Insta Chèques' business, personal information will be updated on an on-going basis as the customer utilizes Insta Chèques' products and services.

SAFEGUARDS

Personal information will be protected by reasonable security safeguards appropriate to the sensitivity of the personal information.

Insta Chèques is committed to the protection of personal information against loss, theft, unauthorized access, disclosure, duplication, use and modification regardless of the format in which the personal information is held.

Insta Chèques will protect personal information disclosed to third parties by means of contractual agreements with respect to the confidentiality of the personal information and the purposes for which the personal information is to be used.

Insta Chèques will use reasonable security measures in the disposal of personal information.

The protection of personal information is an ongoing process, and Insta Chèques will update and review the reasonableness of the security safeguards as needed.

OPENNESS

Information is available to individuals regarding Insta Chèques' policies and procedures relating to the management of personal information. Efforts have been made to make these policies and procedures understandable and easily available, either in written or electronic format.

Insta Chèques will make the following information available:

- Name, title and address of the Privacy Officer;
 - Means of gaining access to personal information held by Insta Chèques;
 - A brief description of the type of personal information retained by Insta Chèques and a general account of its use; and
 - A copy of any brochure or other information that explains Insta Chèques' privacy policies and procedure
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INDIVIDUAL ACCESS

Upon written request, and within a reasonable period of time, a customer will be informed of the existence, use, and disclosure of his or her personal information and will be given access to that information. An individual is entitled to comment on the accuracy and completeness of his or her personal information, and have that information amended where appropriate.

Insta Chèques will respond to an individual request within a reasonable time period and at a minimal cost to the customer. The information will be made available within 30 days of the request and the cost will vary with the type and amount of information requested. Individuals can seek access to their personal information by submitting a written request to the Privacy Officer as follows:

Privacy Officer
Insta Chèques
16 Four Seasons Place, Suite 150
Toronto, Ontario M9B 6E5
privacyofficer@moneymart.ca
www.instacheques.ca

An individual will be required to provide sufficient personal information to confirm their identity with Insta Chèques.

An individual shall be able to challenge the accuracy and completeness of their personal information and have it amended as appropriate. Insta Chèques will amend personal information when a customer successfully demonstrates the inaccuracy or incompleteness of their personal information. Any unresolved disagreements relating to the accuracy and completeness of a individual's personal information will be noted for so long as such information remains relevant.

Insta Chèques may not be able to provide access to any or all of an individual's personal information. If a request for personal information is denied, Insta Chèques will notify the individual in writing, documenting reasons for refusal and resources available for redress.

Reasons for refusing access may include:

- That the personal information is unreasonably costly to provide;
- That the release of the personal information may threaten the life or security of a third party;
- That the personal information is subject to or generated in a formal dispute resolution process;
- That the personal information cannot be disclosed for legal, security, or commercial proprietary reasons; or
- That the personal information is subject to solicitor-client or litigation privilege.

COOKIES AND PIXEL TAGS (www.instacheques.ca)

Cookies are small data files placed on a user's computer by a website. They may store and transmit information to websites that users visit. www.moneymart.ca uses cookies on our website to:

- Help provide our on-line products and services to users
- Market those products and services
- Analyze the flow of traffic to our website
- Analyze and track the traffic of website users from page to page within our website

Third party vendors, including Google, may:

- Show our ads on websites on the internet
- Use cookies to serve ads based on a user's prior visits to our website

Users may accept or decline cookies through the configuration settings of their web-browser. Users may also opt out of Google's use of cookies by visiting the Google advertising opt-out page.

Pixel tags (or clear gifs) are small, transparent graphic images placed on a website or in an email that are not normally visible to the user. They provide non-identifiable information about your usage of the website. www.instacheques.ca uses pixel tags to:

- Note pages visited on our website
- Assist in the administration of affiliate accounts

CHALLENGING COMPLIANCE

Individuals can address any challenge concerning compliance with the Privacy Policy to Insta Chèques' designated Privacy Officer.

To contact the Privacy Officer at Insta Chèques

Privacy Officer
Insta Chèques
16 Four Seasons Place, Suite 150
Toronto, Ontario M9B 6E5
privacyofficer@moneymart.ca
www.instacheques.ca

Insta Chèques will investigate all complaints. The customer will be informed of the outcome of the investigation regarding his or her complaint.

If the Privacy Officer is unable to satisfy the customer's concerns, the customer may then refer to the Privacy Commissioner of Canada at 1-800-282-1376 or info@privcom.gc.ca and, if appropriate, file a written complaint with that office. However, the customer is encouraged to use Insta Chèques' internal information and complaint procedures first.