

Effective Upon: _____

PRIVACY POLICY

OVERVIEW

Family 1st Financial Inc. o/a Family 1st Financial (“Family 1st”, “we”, and “our”) respects and is committed to protecting its clients’ (“client”, “you”, and “your”) privacy in connection with obtaining a secured financial loan.

This Privacy Policy describes:

- The types of information we may collect or that clients may provide when they access or use the website: <https://family1stfinancial.ca/> (the “Website”) and/or when they apply for a secured financial loan (“Loan Services”, together with the Website, the “Services”).
- Our practices for collecting, using, maintaining, protecting, and disclosing that information.

We will only use your Personal Information in accordance with this Privacy Policy unless otherwise required by applicable law. We take steps to ensure that the Personal Information we collect about our clients is adequate, relevant, not excessive and used for limited purposes.

Please read this Privacy Policy carefully to understand our policies and practices for collecting, processing, and storing client information. If you do not agree with our policies and practices, you should not use our Services. By using the Services, clients indicate that they understand and consent to the practices described in our Privacy Policy. This Privacy Policy may change from time to time. A client’s continued use of the Services after we make changes indicates that they accept and consent to those changes, so they should check the Website periodically for updates. We will notify clients in advance of any material changes to this Privacy Policy and obtain their consent to any new ways in which we collect, use, and disclose their Personal Information.

PERSONAL INFORMATION

“Personal Information” includes any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact or locate a single person.

PERSONAL INFORMATION FAMILY 1ST FINANCIAL COLLECTS

Family 1st Financial will collect the following Personal Information:

- Vehicle information including make, model, trim, year, and vehicle identification number. This information is collected to have you add Family 1st as a loss payable lienholder on your insurance policy during the term of the loan.
- Insurance information by way of you providing a copy of their insurance. This is collected to ensure that you have active comprehensive and collision coverage and to ensure the policy has been active for more than 21 days. Information collected includes name and address, along with insurance provider and active coverage validation.
- Registration information by way of you providing a copy of your registration. This information is collected to provide Family 1st with proof that the vehicle being used as security belongs to you. Information collected includes name, address, VIN, license plate number as well as issue and expiry dates.
- Client information including your full name, home and cell phone number, date of birth, SIN, full address, banking information and personal references and a copy of your ID. Accepted ID includes valid driver's license, or a valid passport showing photo and accompanied by a paper interim copy of a new or renewed driver's license.
- If you are employed, Family 1st collects your employment information including name of employer, position, employer address and phone number, salary information, pay frequency, pay type (cheque or direct deposit) and pay frequency and date. This information is used for collection attempts and determining appropriate payment dates for you.
- Such other information that may be required during the identification process and that is collected with your consent or as permitted and lawfully required.

We may collect Personal Information about you through:

- Direct interactions with you when you provide it to us, for example, by corresponding with us; and
- By automated technologies or interactions, when you use the Website, for example, usage details, IP address and operating system, browser version, language and type, domain name system requests, browsing history on the Website, such as date and time of when you visit to the Website and visits to the pages within the Website and information collected through cookies, web beacons, and other tracking technologies.

Like most websites, our servers automatically log each visitor to the Website and may collect the browsing information described above. Family 1st uses browsing information for system administration, troubleshooting, fraud investigation, and to improve the Website. Browsing information generally does not reveal any Personal Information about you.

INFORMATION CLIENTS PROVIDE TO US

When you use our Services, we may ask you to provide:

- Information by filling out a form on the Website. This includes information you provide when you are applying for a loan.
- Information to us in person.
- Records and copies of your correspondence, including email addresses and phone numbers, if you contact us.

Whether you submit Personal Information to Family 1st is up to you. If you decide not to submit Personal Information, Family 1st may not be able to provide any services to you.

AUTOMATIC INFORMATION COLLECTION AND TRACKING TECHNOLOGIES

When you access and use the Website, it may automatically collect:

- Usage details When you access and use the Website, we may automatically collect certain details of your access to and use of the Website, including traffic data, location

data, logs and other communication data and the resources that you access and use on or through the Website.

- Device Information We may collect information about your device and internet connection, including the device's unique device identifier, IP address, operating system, browser type and network information.
- Stored Information and Files The Website also may access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts, and address book information.
- Location Information The Website does collect real-time information about the location of your device.

The technologies we use for this automatic data collection may include:

- Cookies A cookie is a small file placed on a device. It may be possible to refuse to accept cookies by activating the appropriate setting on a device. However, if this setting is selected, you may be unable to access certain parts of our website. Information gathered using cookies helps us improve client user experience. For example, a cookie can help the Website load properly.
- Web Beacons Pages of the Website and our emails may contain small electronic files known as web beacons (also referred to as gifs, pixel tags and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related Website statistics (for example, recording the popularity of certain Website content and verifying system and server integrity). This information is used to improve the Website.

The information we collect automatically is statistical information and may include Personal Information. We may maintain it or associate it with Personal Information we collect in other ways that you provide to us, or we receive from third parties. This usage information helps us to improve our Website, including helping us to estimate our audience size and usage patterns.

You can set your browser to refuse all or some browser cookies, or to alert them when cookies are being sent. You can learn how to manage your Flash cookie settings by visiting the Flash player settings page on Adobe's website. If you disable or refuse cookies, some parts of the Website may not be accessible or may not function properly and you may not be able to view advertisements based on past visits to the Website or report or interact with advertisement impressions.

PURPOSE FOR WHICH FAMILY 1ST HANDLES PERSONAL INFORMATION

Family 1st may collect and use your personal information for the following purposes:

- To provide you with our Services;
- To provide you with information or services that you request from us;
- To verify identity or other information provided by you and to determine eligibility for a secured loan;
- To manage and promote the business activities of Family 1st;
- To administer you qualified loans into our database and to service those accounts;
- To evaluate current and ongoing creditworthiness and other requirements and to determine eligibility for products offered at Family 1st;
- To collect outstanding debts;
- To communicate with you including via mail, e-mail, text messaging and telephone;
- To advertise, market and promote products and services offered by Family 1st;
- To improve our Services or client relationships and experiences;
- To carry out our obligations and enforce our rights in any contracts with you, including for billing and collection or to comply with legal requirements;
- To maintain accurate business records for maintaining legal and regulatory record retention requirements;
- To fulfill the purposes for which you provided it or that were described when it was collected or any other purpose for which you provided it; and
- For other purposes identified by Family 1st with your consent or as permitted or required by law.

We may also use your information to contact you about other services that may be of interest to you, as permitted by law. If you do not want us to use your information this way, you may contact us to request us to cease.

DISCLOSURES OF PERSONAL INFORMATION

Family 1st may disclose personal information under certain circumstances, including:

- To third party bailiff companies for the purpose of collection of your secured asset to settle a delinquent account;
- To Alberta Registries office for the purpose of securing a lien on your secured asset;
- To third party install companies for the purpose of scheduling the installation of a GPS system in the secured asset;
- According to applicable law, to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Family 1st's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding in which Personal Information held by Family 1st about you is among the assets transferred.
- To contractors, agents, service providers and other third parties we use to support our business, such as analytics and search engine providers that help us optimize and improve our Website. We contractually require these third parties to keep Personal Information confidential, use it only for the purposes for which we disclose it to them, and to process Personal Information following the same standards set out in this Privacy Policy. We are required to ensure that any third parties agree to keep Personal Information confidential, use it for the purpose in which it was disclosed and process it following the same standards contained in this privacy policy.
- To fulfill the purpose for which you provide it.
- Where the personal information is publicly available.
- To third parties for whom clients have provided their authorization or consent to disclosure.
- With your consent.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request, according to applicable law, and including, without limitation, in connection with an investigation or in response to a subpoena or court order.
- If we believe such disclosure is necessary or appropriate to protect the rights, property, or safety of Family 1st, our clients, the public or others.
- For additional purposes identified by Family 1st, with your consent, or as permitted or required by law.

Family 1st does not disclose personal information to advertisers or third parties to market their services.

In addition to the above, personal information may be shared between or storefront locations and corporate employees for the purpose of internal auditing, management or for administrative purposes including defending and bringing legal actions.

In the event of delinquency, we may also use and disclose personal information in connection with the sale, assignment or other disposal of all or part of the secured asset used to obtain funds from Family 1st.

Family 1st may disclose personal information as necessary to meet legal, regulatory, insurance, audit and security requirements with your consent or as permitted or required by law.

SAFEGUARDS

Family 1st uses reasonable safeguards and other security standards, such as encryption, passwords, and locked cabinets to protect all client information it collects against loss or theft, as well as unauthorized access, disclosure, copying or modification, regardless of the format in which that information is held. Only authorized employees of Family 1st are permitted to access client personal information to fulfill their job requirements.

DATA RETENTION

Except as otherwise permitted or required by applicable law or regulation, we will only retain your personal information for as long as necessary to fulfill the purposes we collect it for, including for the purposes of satisfying any legal, accounting or reporting requirements. Under some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to the client or their consent.

ACCESS AND ACCURACY

It is important that the Personal Information we hold about you is accurate and current. You are to keep us informed if your Personal Information changes. By law 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 use of your Personal Information you may contact us at info@family1stfinancial.ca 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 that the change would violate any law or legal requirement or cause the information to be incorrect. We may charge you a fee to access your Personal Information, however, we would notify you of any fee in advance.

We may request specific information from you to help us confirm your identity and your right to access, and to provide you with the Personal Information that we hold about you or make your requested changes. Applicable law may allow or require us to refuse to provide you with access to some or all the Personal Information that we hold about you, or we may have destroyed, erased, or made their Personal Information 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 reason why, subject to any legal or regulatory restrictions.

We will provide you with access to your Personal Information, subject to exceptions set out in applicable privacy legislation. Examples of such exceptions include:

- Information protected by solicitor-client privilege.
- Information that is part of a formal dispute resolution process.
- Information that is about another individual that would reveal their Personal Information or confidential commercial information.
- Information that is prohibitively expensive to provide.

If you are concerned about our response or would like to correct the information provided, you may contact us at info@family1stfinancial.ca.

WITHDRAWING CLIENT CONSENT

Where you have provided your consent to the collection, use and disclosure of your Personal Information, you may have the legal right to withdraw your consent under certain circumstances. To withdraw your consent, if applicable, you can contact info@family1stfinancial.ca. If you withdraw your consent, we may not be able to provide you with our Services. We will explain the impact to you at the time to help you make your decision.

CHANGES TO OUR PRIVACY NOTICE

By submitting Personal Information to us, you consent to the collection and use of the information in accordance with this Privacy Policy. We may change this Policy at any time. The Privacy Policy's effective date will show the last date changes were made. You are responsible for periodically visiting our Website to view the Privacy Notice and to check for any changes. If you provide information to us following any change of the Privacy Policy, that signifies your assent to and acceptance of the changes to the Privacy Policy.

FAMILY 1ST FINANCIAL'S WEBSITE AND EMAIL COMMUNICATION

Family 1st does not guarantee the confidentiality of any communications made by you via e-mail or otherwise through our website. If you wish to provide information of a confidential or sensitive nature to Family 1st, you may contact us directly by calling one of our locations listed on our website to arrange for delivery/transmission of such information by secure means.

INQUIRIES OR FURTHER INFORMATION

Family 1st has appointed a Privacy Officer to oversee compliance with this Privacy Policy and applicable privacy laws. Any questions related to the Privacy Policy or the handling of personal information by Family 1st Financial can be addressed directly to the Privacy Officer at:

Privacy Officer, Family 1st Financial
16604-109 Avenue
Edmonton, AB T5P 1C2
info@family1stfinancial.ca