

Global Reach Financial Solutions Inc.

Privacy Policy

COMMITMENT

At Global Reach, we are committed to ensuring that your privacy is protected. We collect personal information in the normal course of business in order to administer your account and to serve you better. Our privacy commitment includes ensuring the accuracy, confidentiality, and security of our clients' personal information. We collect, use and disclose your personal information only as permitted under applicable Canadian privacy legislation.

This Privacy Policy may be amended from time to time. The current version will always be available to you on our website, www.globalreachgroup.ca/privacy

SCOPE

This policy details how Global Reach Financial Solutions Inc. ("Global Reach", "we", "our") collects, uses and discloses your personal information. "Personal information" is defined as any information about an identifiable individual and may be stored in any format. This policy applies to the collection, use and disclosure of personal information of our clients that we deal with in Canada ("you" and "your").

ACCOUNTABILITY AND SECURITY

Global Reach is responsible for personal information in its possession or control. Our Privacy Officer is accountable for overseeing compliance with this Privacy Policy and applicable Canadian privacy legislation, such as the Personal Information Protection and Electronic Documents Act or equivalent applicable provincial legislation.

We use reasonable physical, administrative, and technical measures designed to secure your personal information from accidental loss and from unauthorized access, use, modification, theft and disclosure. We regularly monitor our security measures and procedures to ensure that they are effective and properly administered.

We sometimes use outside companies, called third parties, to help us provide the product or service you request. Regardless of the location of these third parties, Global Reach requires these third parties to meet or exceed the privacy principles in compliance with Canadian privacy legislation.

Unfortunately, the transmission of information via the Internet and platforms is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted through the website. Any transmission of personal information is at your own risk.

The safety and security of your information also depends on you. Where we have given you (or you have chosen) a password for access to certain parts of our website, such as your own account, you are responsible for keeping it confidential. We ask you not to share your password with anyone.

HOW WE COLLECT PERSONAL INFORMATION

For the most part, we collect personal information directly from you, such as when you create an account or provide us information directly. We may also collect personal information from other financial institutions, from government agencies, from credit bureaus or from references that you have provided to us.

We may also automatically collect information when you visit our website. See "Internet Technology and External Websites" to learn more.

WHAT INFORMATION WE COLLECT

We collect personal information about individuals, either as account holders themselves or those that are authorized signatories or users, including directors and beneficial owners to the businesses that are our clients. We collect the following information about you: name, address, telephone number, date of birth and other identifying information to complete a transaction and as required by law or regulation, specifically to be able to offer you the products and services agreed to.

PURPOSE AND USE OF INFORMATION

We will only collect client information that is necessary to fulfill the following purposes:

- To verify your identity
- To verify creditworthiness
- To understand your financial needs
- To open and manage your account
- To deliver to you the requested products and services
- To process your payments
- To provide Global Reach marketing material and subscriptions
- To ensure a high standard of service
- To meet legal and regulatory requirements

We may also use your information to communicate special offers, new products or features or invite you to participate in surveys or opinion-gathering devices. If you do not wish to receive such communications, you may “opt out” at the time Global Reach collects information or at any time thereafter by emailing us at privacycanada@globalreachgroup.com

CONSENT

Global Reach will advise you of the purposes for which personal information is being collected. Your consent may be implied by your acceptance of our terms and agreements or by using a product or service that you have requested. Global Reach may explicitly request and obtain consent from you to conduct credit or personal background checks, if required.

Consent can be provided in writing, electronically or verbally. You may refuse or withdraw your consent to the collection, use or disclosure of your personal information. Doing so, however, may mean that we will be unable to provide you with the product or service that you have requested.

Global Reach will not collect, use or disclose your personal information without your consent unless authorized or required by law.

DISCLOSURE OF INFORMATION

No personal information will be disclosed to anyone outside of Global Reach, except:

- For day-to-day operational purposes, as required to process your transactions, manage your account, managing the information technology, responding to lawful government requests, investigations or courts, or to offer you the agreed upon products and services
- To our third-party service providers who perform services on our behalf, such as data processing and storage, fraud prevention and detection, regulatory compliance, banking services, treasury management and payment providers
- To credit reporting firms or agencies for the purpose of obtaining a consumer credit report to assess your credit worthiness or verify your identity
- When the collection, use or disclosure of personal information is permitted or required by law;
- When we require legal advice from a lawyer
- For the purpose of collecting a debt

- To protect ourselves from fraud or to investigate a breach of an agreement or a contravention of law
- In an emergency that threatens an individual's life, health, or personal security;

We will not use or disclose personal information for any other purpose unless we obtain explicit consent to do so.

RETAINING PERSONAL INFORMATION

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 collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Under some circumstances, we may anonymize or aggregate 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 you or your consent.

We will use care in the disposal, destruction, or de-identification of personal information to prevent unauthorized parties from gaining access to personal information.

ACCURACY AND ACCESS OF PERSONAL INFORMATION

Global Reach will make reasonable efforts to ensure that the personal information you provide to us remains as accurate, complete and current as possible for the purpose for which it was collected. In some instances, we ask for your assistance in keeping your information up to date, such as in the case of your address and telephone number. From time to time, we may be required to update your personal information to comply with the Proceeds of Crime (Money Laundering) and Terrorist Financing Act and its regulations.

Keeping your information accurate and current will help us provide you the best possible service. Clients may request correction to their personal information in order to ensure its accuracy and completeness. A request to correct personal information must be made in writing and must provide sufficient detail to identify the personal information and the correction being sought.

Global Reach will provide you with access to your personal information except where we are prohibited by law from doing so, or are permitted by law to restrict your access and have legitimate reasons for doing so.

INTERNET TECHNOLOGY AND EXTERNAL WEBSITES

Some of Global Reach's services are made available to you using online services on our website. If you provide personal information using these online services or by other electronic means, the information will be collected, used and disclosed in accordance with this policy.

When you visit our website, we may collect information about your online browsing and transactions including the pages that you visit, technical information about your computer and operating systems. Global Reach may also collect information by using cookie files. Information collected from online services is used strictly to ensure web services are functioning properly and to understand how clients utilize the website, allowing us to serve you better.

Our website may include links to third-party websites, including social media platforms. We provide these links for your convenience. Please note that third-party websites and platforms are governed by their own privacy policies. When you use any social media, links, shortened links, you do so at your own risk and we cannot be held liable nor responsible for any issues, damages or implications that arise.

CONTACT US

In order to fulfill requests for personal information records or to address any questions or concerns about privacy at Global Reach, please feel free to contact us by phone +1.778.400.7715, email privacycanada@globalreachgroup.com, or by mail:

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Global Reach will promptly investigate all inquiries or complaints and take appropriate action or measures when justified, including amending its policies and practices.