



Privacy Policy V4.1

Last Updated: February 14, 2024

This Privacy Policy ("Policy") explains how FISPAN, and its subsidiaries and affiliates (collectively, "FISPAN" "us" "we" "our") process personal information when you interact with us online, via our websites, offline, and at conferences and events. This policy applies to all of the products, services, and website (collectively "Services") offered directly by FISPAN.

For the purposes of the General Data Protection Regulation (the "GDPR"), FISPAN is the controller of your personal information.

Table of Contents

How We Collect Personal Information	2
What Personal Information We Collect	2
How We Use Personal Information	3
How We Disclose Personal Information	4
Your Privacy Rights and Choices	5
Your Marketing Preferences	6
Cookies and Other Tracking Technologies	6
Children’s Privacy	7
Third-Party Links	7
Security of Your Personal Information	7
Data Retention	8
Transfer of Personal Information Between Countries	8
Shine the Light Disclosure	8
Changes to this Policy	9
Contact Us	9
European Residents	9
Legal Basis for Processing	9
Data Protection Rights	10
International Transfers	11

How We Collect Personal Information

We may collect your personal information:

- **Directly from you.** This includes personal information we collect when you sign up for our newsletter, information you provide when you create an account with us, provide feedback, or otherwise engage with us.
- **From public or third-party sources.** This includes personal information we collect from public sources including, but not limited to, websites that enable social sharing, social media sites, and from our service providers, vendors and suppliers, our affiliates, or other individuals and businesses.
- **From devices you use when you interact with us online.** This includes personal information we collect through our websites and applications and automatically from devices you use to connect to our websites.
- **From our Bank partners and their clients that use our Services.** We may process personal information on behalf of our Bank partners, and their clients that use our platform, when providing them with our Services.
- **From you at in-person events.**

If you choose to submit any personal information relating to other people, we assume you have the appropriate authority to do so and we may use such information in accordance with this Policy.

What Personal Information We Collect

We may collect the following types of personal information:

- **Contact information,** such as your name, address, email address, telephone number, or other similar identifiers.
- **General demographic information.**
- **Financial and payment information,** such as those needed to deliver the Services.
- **Account information,** such as a username and password, and other profile details you choose to provide.

PUBLIC INFORMATION

- **Internet usage information**, such as browsing history, search history, IP address, and information regarding your interaction with our online offerings.
- **Professional information**, such as information about your job function and role, title, professional affiliations, and employer.
- **Other personal information you provide**, such as the content of your communications with us, including interactions with us and contacts with us online, in writing, over the phone, and in-person.

How We Use Personal Information

We process personal information to provide our services and operate our business. Generally, we use personal information to:

- **Provide and develop our products and services.** We collect information to provide our Services, maintain our websites and apps, and better understand the interests of our Bank partners and their clients.
- **Training our employees and improving our products and services.** We may record product demo, onboarding and technical support calls with you for internal training of our employees or to understand your needs and feedback in connection with use of our products and services.
- **Communicate with you.** We may use your information to respond to your inquiries and send you communications regarding our products and services.
- **Research and development and quality assurance.** We may use personal information to study, develop, and improve our products and services.
- **Security and fraud prevention.** We may use personal information to monitor, detect, and prevent fraud and improper or illegal activity and protect you, us, Bank partners and their clients, and the public.
- **Debugging.** We may use your personal information to secure our online services including our network and websites and to debug our online services.
- **Comply with law.** We may use personal information to comply with our legal and regulatory obligations, to defend ourselves in litigation and investigations, and to prosecute litigations.

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We may use personal information for our internal business purposes, such as data analysis, audits, and enhancing our services. We may also use inferences drawn from personal information to create a profile reflecting your preferences so we can tailor our services to you.

We may aggregate, anonymize, and/or de-identify personal information we collect such that the data is no longer personally identifiable or attributable to you (“Non-Personal Information”). We may use Non-Personal Information for our own legitimate business purposes without restriction, including product development and improvement activities.

How We Disclose Personal Information

We may disclose personal information within our company, certain third parties, and other parties at your discretion.

- **Our Bank partners and your ERP Provider.** We may share personal information with our Bank partners and your ERP Provider where it is required to provide our Services.
- **Service providers.** We may provide personal information to vendors, contractors, business and service partners, or other third-parties who provide services to us including analysis firms, advertisers, payment processing companies, shipping companies, and others.
- **Professional Services.** To firms that provide professional consultancy services on our behalf, such as our auditors, legal advisors, or accountants.
- **Government, regulatory, or law enforcement agencies.** We reserve the right to disclose your information to respond to valid information requests from government authorities and judicial requests, to investigate potential fraud, or where otherwise required by law. We may disclose your personal information where we believe the disclosure is necessary or appropriate to comply with regulatory or legal requirements or to protect the safety, rights, or property of ourselves and others and to exercise, establish, or defend our legal rights.

PUBLIC INFORMATION

- **In connection with a merger, acquisition, or business transfer.** If we sell all or a part of our company, or complete a merger or a similar corporate event, your information may be transferred to the buyer.

We do not sell or transfer your personal information to third-parties to use for their own benefit.

We may also disclose Non-Personal Information to third-parties at our discretion.

Your Privacy Rights and Choices

Depending on where you reside, you may have certain rights and choices regarding our processing of your personal information. These include:

- The right to know the categories and/or specific pieces of personal information collected about you, including whether that personal information is sold or disclosed and with whom it was shared;
- The right to access a copy of the personal information we retain about you;
- The right to request deletion of your personal information; and
- The right to correct your personal information

We will verify your identity in connection with any requests and take steps designed to ensure that only you or your authorized representative can exercise these rights. If you are an authorized agent making a request, we may require and request additional information to verify you are authorized to make the request.

There may be situations where we cannot grant your request. Where we deny your request in whole or in part, we will take steps to inform you of the denial and provide an explanation of our actions and the reasons for the denial.

We will not restrict or deny you access to our products and services because of the choices you make in connection with your personal information, but please note, certain choices may affect our ability to deliver our services. For example, if you ask us to delete your email address, we will not be able to send you emails about our services and offerings.

PUBLIC INFORMATION

You may exercise any of your rights in relation to your personal information by contacting us using the details provided in the “Contact Us” section below.

If you are a European Resident, meaning someone who resides in the European Economic Area (“EEA”), Switzerland, or the United Kingdom, please see the section “European Residents” for additional information about your rights and our obligations with respect to our processing of your personal information.

Your Marketing Preferences

If you opt-in to receiving marketing materials from us and no longer wish to receive such marketing materials from us, you may opt-out at any time. You may unsubscribe from receiving marketing or other commercial emails from us by following the instructions included in the email. We will work to comply with your request promptly.

However, even if you opt out of receiving such communications, we may need to continue to send you certain non-marketing communications (such as information about changes to our Privacy Policy or Terms of Use).

Cookies and Other Tracking Technologies

We, our service providers, and our business partners may also collect certain information about the use of our online services by automated means, such as cookies, web beacons, and other technologies.

We, our service providers, and business partners may collect information about users’ online activities over time and across third-party websites.

The information that may be collected by automated means includes:

- URLs that refer users to our online services
- Search terms used to reach our online services
- Details about the devices that are used to access our website and apps (such as IP address, browser type, and operating system information)

PUBLIC INFORMATION

- Details about users' interaction with our website and apps (such as the date, time, frequency, and length of visits, and specific pages accessed during the visits)

Web browsers may offer users of our online services the ability to disable receiving certain types of cookies; however, if cookies are disabled, some features or functionality of our Services may not function correctly.

We do not respond to web browser-based "Do Not Track" signals at this time.

Children's Privacy

Our Services are not intended for or directed to children under the age of 18 , and we do not knowingly collect any personal information from children under the age of 18. If you are under the age of 18, please discontinue the use of our services and do not provide us with personal information of any kind. If we learn that we have collected personal information from a child under the age of 18, we will endeavor to delete that information.

Third-Party Links

FISPAN's website may contain links to external, third-party websites as a convenience for you and your interests. The inclusion of these links does not imply FISPAN's endorsement of their privacy practices and this Policy does not apply to them. If you follow a link to any of those external, third-party websites, please note that they have their own privacy policies and that we do not accept any responsibility or liability for their policies or processing of your personal information. We recommend that you familiarize yourself with the privacy policies provided by the owners of these third-party websites before submitting any personal information to them.

Security of Your Personal Information

We take precautions to protect your personal information. However, the confidentiality of information transmitted over the Internet cannot be guaranteed.

PUBLIC INFORMATION

While we use encryption to protect sensitive information transmitted online, we also protect your personal information offline. Only employees who need the access to personal information to perform a specific job (for example, billing or customer service) are granted access to such information. The computers/servers in which we store your personal information are kept in a secure environment.

Data Retention

We keep personal information as long as it is reasonably necessary for the purposes described in this Policy or otherwise in compliance with our Bank partners' data retention policies. Certain data may be retained until the time limit for any legal challenges has expired or in order to comply with regulatory requirements regarding the retention of such personal information. Where applicable, if any personal information that we hold is no longer required for the purpose for which it was collected and no applicable law requires us to retain that data, we will take reasonable steps to de-identify or destroy the data.

Transfer of Personal Information Between Countries

Any information you provide to FISPAN may be stored and processed, transferred between, and accessed from other countries which may not guarantee the same level of protection of personal information as the one in which you reside. However, FISPAN will handle your personal information in accordance with this Privacy Policy regardless of where your personal information is processed. If you are a European Resident, please see the "European Residents" section below for more information about international transfers of personal information.

Shine the Light Disclosure

We do not share personal information as defined by California Civil Code § 1798.83 (the "Shine the Light Law") with third-parties for their direct marketing purposes absent your consent. If you are a California resident, you may request information about our compliance with the Shine the Light law by sending an email to

PUBLIC INFORMATION

privacy.officer@fispan.com. Any such request must include “Request for California Privacy Information” in the subject line and include your name, street address, city, state, and ZIP code. Please note that we are only required to respond to one request per customer each year, and we are not required to respond to requests made by means other than through this email address or mail address.

Changes to this Policy

We may change this Policy at any time. Please review this Policy periodically to review any updates. We will post any changes on this page and indicate the date this Policy was last revised. You may read a current, effective copy of this Policy at any time by visiting this page.

Contact Us

If you would like to contact FISPAN about this Privacy Policy you may contact us any time through this website or via telephone at 604-424-9090 or privacy.officer@fispan.com. Alternatively, you may send a letter to the following address:

FISPAN Services, Inc.
355 Burrard Street, Suite 220,
Vancouver, British Columbia V6E 2G8
Canada

European Residents

If you are a European Resident, you have certain rights and protections under the law regarding the processing of your personal data.

Legal Basis for Processing

We only process your personal information if we can rely on a legal basis, which include:

PUBLIC INFORMATION

- **Performance of a contract.** We need to use your personal information to perform our responsibilities under our contract with our Bank partners or your ERP Provider (e.g., processing payments).
- **Our legitimate interests.** We have a legitimate interest in processing your personal information, which includes:
 - Conducting data analytics.
 - Improving our products and services.
 - Compliance, fraud prevention, and safety;
 - Asserting or defending against legal claims in case of a legal dispute; and
 - Ensuring information security and the security of our IT systems.
- **Compliance with legal obligations.** We need to do so to comply with a legal obligation to which we are subject.
- **Consent.** We have your consent to do so, which you may withdraw at any time. Please note that withdrawal of the consent only takes effect for future processing. Any processing carried out on the basis of the consent prior to its withdrawal is unaffected by the withdrawal. You can request a list of processing activities for which you provided consent at any time.

There is no contractual or statutory obligation for you to provide personal information. If you do not provide personal information, we will not be able to provide certain Services to you.

Data Protection Rights

In addition to the rights and protections in the “Your Rights and Choices” section above, you have:

- The right to object to processing of your personal information for reasons arising from your particular situation. The above general right to object applies to all processing purposes described in this Policy that are processed on the basis of our legitimate interests. Unlike the specific right to object to data processing for marketing purposes, GDPR only requires us to implement a general right to object if you provide us with overriding reasons for doing so.
- The right to submit a complaint with the supervisory authority of your usual place of residence or workplace or our headquarters.

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International Transfers

For EEA personal information, transfers of personal information are generally undertaken with adequate safeguards in place to protect personal information, such as Standard Contractual Clauses issued by the European Commission, which are, where necessary, supplemented with additional measures to provide adequate protection of personal information. Please contact us at privacy.officer@fispan.com for additional information or to obtain a copy of Standard Contractual Clauses.