



## Privacy Policy

Version: 1.0 / October 2019

## **Privacy Policy**

This is how VFX Global Payments Inc. trading in Canada as VFX Financial (VFX) approaches customer privacy, as it applies to the services offered through the VFX websites, and any VFX affiliate or subsidiary website that has a link to this privacy statement. This privacy statement describes how VFX websites collect, use and share information from or about you and explains how the information may be used for marketing purposes.

By using VFX branded websites, you agree to the terms and conditions of the privacy statement.

### **Customer privacy and why it is important to us**

At VFX, we recognise and understand the importance of keeping our customers' personal data and account information secure.

- We use established industry protocols and well-established security standards to protect your personal information from unauthorised access or unlawful disclosure, accidental loss or destruction.
- We verify the identity of our customers through the use of personal passwords as well as two factor authentication or other information, in order to allow them to access to their account/s.
- We also use recognised industry counter-measures to protect our customers' accounts from fraudulent use.

### **Push Notifications**

VFX uses technology called Push Notifications across all our channels in connection with security authentication requirements and other general communications. Push notifications play an integral role in supporting our access protocols to our systems which provides you with reassurance that you have landed at our genuine website and can use our services with confidence.

### **Information we collect and use when you visit our websites**

When you visit this site, we may collect certain types of information from you, such as information you provide via forms, surveys, applications, etc. We may also collect information about you from your online browsing, including your preferences, pages visited, technical information regarding your device and operating systems, such as your internet protocol address, domain name, system configuration and settings. We will also collect IP address geographical location data for the purposes of detecting and preventing potential fraud.

## **Use of Cookies**

We use cookies to improve your user experience whilst visiting our website. Where applicable this website uses a cookie control system allowing the user on their first visit to the website to allow or prohibit the use of cookies on their computer or mobile device.

Cookies are small, innocuous files saved to a customer computer's hard drive that track, save and store information about user's interactions and usage of the website. This allows us to provide you with a more user-friendly experience and prevent fraud.

Users are advised that if they wish to prevent the use and saving of cookies from this website they should take necessary steps within their web browsers security settings to block cookies from this website or on the case of mobile phones the user should consult the operating manual.

## **Use of Analytics**

We use web analytics tools provided by service partners such as Google Analytics, to collect information about how you interact with our website or mobile applications, including what pages you visit, what site you visited prior to visiting our website, how much time you spend on each page, what operating system and web browser you use and network and IP information. We use this information to improve our services. These tools place persistent cookies in your browser to identify you as a unique user the next time you visit our website. The information collected from the cookie may be transmitted to and stored by these service partners on servers in a country other than the country in which you reside. Though information collected does not include personal data such as name, address, billing information, etc, data such as your IP address is collected. This information may be used and shared by these service providers in accordance with their individual privacy policies.

You can read Google's privacy policy here for further information

<http://www.google.com/privacy.html>.

- We may use the information gathered when you visit our websites to improve the content of the website and make it more useful, as well as to monitor and/or record your activities for quality evaluation, training, legal and regulatory purposes.
- We may display personalised messages to you when you access and other VFX Financial PLC channels and applications.

## **Retention of your information**

VFX Global Payments Inc. are bound by a multitude of legislations and regulations, therefore we have to keep financial records for a stipulated duration depending on the overriding regulation. Please refer to the 'VFX Data Classification, Retention and Disposal Policy' which details the duration of time we are legally required to hold your data.

## **When you apply for a product**

If you apply for a VFX product or if you hold an account with us any personal information which you provide to us will be used in accordance with this policy and the 'How we use your information' provisions set out in the relevant agreement.

Any personal information which you provide to us as part of any eligibility check you complete on our website, will be used in accordance with this policy and the eligibility check terms. For example, we may use information you provide, to help us analyse and develop our products, services, website content and advertising materials.

We may use any contact details that you provide to us in the course of an application for a product or as part of an eligibility check to contact you about your application or your account. We may contact you by email, text message, telephone or by post.

## **How we share your data**

We may share information as required or as permitted by law with:

- Credit reference agencies and global data verification providers for the purposes of customer identification and verification;
- Fraud prevention agencies;
- Service providers who perform services for us and help us operate our business including technology providers, web analytics providers (Google Analytics), third-party advertising agencies and social media platforms (for the purposes of advertising). Where we share information with service providers, we require them to safeguard such information and only use it for the purposes we specify;
- Associated brands operated by VFX;
- Payment scheme providers (for example MasterCard or Visa).

## **Where we store your personal data**

We may transfer personal information to other countries outside of Canada. In such circumstances we are responsible for making sure that your information continues to be protected.

## **Your rights**

You have a right to access, update and change or correct your personal information held by VFX. If you want to do so or if you have any questions about how we process your personal information, please contact us at: [privacy@vfxfinancial.ca](mailto:privacy@vfxfinancial.ca)

If you would like to opt out of marketing broadcasts please login to your account and update your marketing communication preferences. If you have any issues, please contact us.

If you would like to control how cookies and similar technologies are placed on your device when using our websites (including Google Analytics), please see our cookie policy for more information.

## **Advertising**

VFX may use personal information we hold about you to select marketing offers that might be relevant to you. We may use third-party companies to execute these marketing programmes, to do this we may share non-obvious personal information (e.g. information that does not include name, address, email address or telephone number) with third-party companies to show advertisements on our behalf on our website and other websites. This includes third party advertising agencies and social media platforms.

They may use cookies and similar technologies in order to display marketing to you. These companies help VFX execute, optimise, and measure the effectiveness of our online banner advertising programmes. They use cookies and non-obvious personal information about your visit to this and other websites to measure advertising effectiveness and to provide advertisements about goods and services that may interest you.

We will not provide personal information to any third parties for them to use for their own direct marketing purposes unless we have obtained your prior consent to do so.

## **VFX Privacy policy changes**

VFX may change this privacy policy from time to time. When such a change is made, we will post a revised version online. Changes will be effective from the point at which they are posted. It is your responsibility to review this privacy policy periodically so you're aware of any changes. By using our services, you agree to this privacy policy.

## **Contact Us**

If you have any further questions about our Privacy Policy or a specific request regarding your Personal Data, please do not hesitate to contact us via email: [privacy@vfxfinancial.ca](mailto:privacy@vfxfinancial.ca) or in writing to:

**VFX Global Payments Inc.**

**140 Yonge Street**

**Toronto**

**Ontario, M5C 1X6.**

Should you not be satisfied with the resolution of any complaint made concerning your privacy, you may submit a complaint to the Privacy Commissioner in your province of residence or to the Office of the Privacy Commissioner of Canada:

**Office of the Privacy Commissioner of Canada**

**30 Victoria Street,**

**Gatineau,**

**Quebec, K1A 1H3**

**Telephone: 1 800 282 1376**

This privacy policy was last reviewed on 10th October 2019.