

CASH-X® PRIVACY POLICY

Policy on the Collection, Use and Disclosure of Personal Information **(“Privacy Policy”)**

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1. OBJECTIVE & SCOPE OF PRIVACY POLICY

CASH-X is committed to providing reliable, timely, and accurate Paydav Advance & Cheque Cashing to its customers across Canada. Consistent

with the Canada Standards Act Privacy Code, the Personal Information Protection

and Electronic Documents Act (“PIPEDA”), CPA (Canadian payments Association) and other applicable law, CASH-X is dedicated to maintaining high standards of confidentiality with respect to the personal information it collects from its customers.

This Privacy Policy governs personal information collected from our customers for the purposes of completing and filing Paydav Advance & Cheque Cashing. It does not cover aggregated data from which the identity of an individual cannot be determined, or information that is available from a public source, such as a telephone directory.

This Privacy Policy applies to all CASH-X employees, its franchisees and franchises’ contracted employees. Using contractual or other arrangements, Cash-X will ensure that agents, contractors and third party service providers, who may receive personal information in the course of providing services to CASH-X as part of Cashx’s delivery of services, protect the personal information in a manner consistent with the principles set out in this Privacy Policy.

If a question arises regarding access to your personal information held by Cash-X, or there is a concern about the manner in which CASH-X collects, uses, retains and discloses your personal information as one of Cash-X’s clients, please contact:

Steve Sardo Email: steveceo@cashxsolutions.com

Chief Privacy Officer Toronto phone: 416-234-8657

CASH-X Canada Toronto fax: 416-234-9354

Clarica Centre – Center Tower Toll free phone:1-866-462-2749

3300 Bloor Street West, Suite #3140 Toll free fax: 1-866-606-8364

Etobicoke, ON M8X 2X2

2. DEFINITIONS

“**EFT**” means the Electronic funds transfer.

“**Consent**” means voluntary agreement with the collection, use, retention and

disclosure of information for the purposes for which Cash-X has been retained. Express consent is obtained explicitly, in writing, from the Customer.

“Collection” means any and all information obtained from the Customer for the purpose of providing payday loans or cashing cheques. Collection also means any and all information obtained about the Customer from other third party sources such as Credit Agency or cheque verification services for the purpose of providing payday advance or cheque cashing services.

“Customer” means any individual that has retained Cash-X’s services.

“Disclosure” means making available Personal Information and business information about the Customer to third party government agencies or organizations outside of Cash-X.

“Organization” means a business, association, partnership, person, or trade union.

“Personal Information” means any information about the Customer, recorded in any form, that is identifiable to that individual either directly or by inference from the information, but does not include the name, title or address, or other information relating to the Customer’s business or place of employment.

“Transfer” means filing or otherwise transferring Personal Information and business information from the CASH-X location to the CASH-X head office, or from CASH-X to a government Agency or credit agency for the purposes consented to by the Customer.

“Use” means the tabulation of all information obtained from the Customer and other third party sources

3. COLLECTION, USE & TRANSFER OF PERSONAL INFORMATION

Purpose: The purpose for the collection, use and transfer of a Customer’s Personal Information by Cash-X, its employees, and contracted employees, is to obtain all pertinent and necessary information for the underwriting a payday advance or cashing his/her cheque.

Collection: Personal Information will be collected, to the extent possible, directly from the Customer. Where Personal Information is not available from the Customer, but may be obtained from a financial institution, government agency, or other third party source, Personal Information will be collected from those sources. Personal Information that is collected by, and about, the Customer is limited to only that information that is required

Use & Transfer: Personal Information that is collected in the underwriting of payday advances or cheque cashing will be transferred to Cash-X’s head office. The Personal Information is not otherwise used or disclosed to any third party organizations for any reason outside the purpose stipulated above. Any data that is aggregated for statistical or business monitoring purposes, will be rendered anonymous so as not to be identifiable to the Customer.

4. CONSENT

When a Customer signs the Loan application or EFT (electronic funds transfer Form, the

Customer consents and agrees to the following:

a. CASH-X may collect, use, retain, disclose and/or transfer all Personal

Information about the Customer for the purpose set out above;

- b. The Customer has a right to access or correct data collected by Cash-X;
- c. The Customer accepts the risks that may be associated with electronic transmission and storage of their data;
- d. CASH-X has the right to disclose Personal Information about the Customer to government or legal enforcement agencies if CASH-X determines that the Customer has provided false, misleading, or otherwise incorrect information for fraudulent or illegal purposes; and
- e. CASH-X may disclose Personal Information about the Customer if requested by an organization in the midst of any criminal investigation.

5. ACCURACY

CASH-X endeavors to ensure that any Personal Information provided by its Customers, and in its possession, is accurate, current and complete as is necessary for the purposes for which the Personal Information is used and transferred. Upon notification by a Customer that the Personal Information collected and used by Cash-X requires correction or updating, CASH-X will endeavor to make the necessary corrections promptly. Personal Information contained in files that have been closed, or from prior year Payday Advance & Cheque Cashing, is not actively updated or maintained.

6. RETENTION

CASH-X retains Personal Information as long as CASH-X believes it is required to retain such information for the purpose of underwriting Payday Advance and Cheque Cashing and having such information available in the event that such information is required by law.

. After a Customer's loan or cheque transaction is completed it is stored at the CASH-X site. The Personal Information also stored on the CASH-X main database to enable CASH-X.

7. SECURITY

CASH-X endeavors to maintain physical, procedural and technological security at its offices, head office, and information storage facilities to prevent any loss, misuse, unauthorized access, inadvertent disclosure or modification of Personal Information. CASH-X further protects Personal Information by restricting access to Personal Information to those employees that have authorized access in order for CASH-X to provide its services to its Customers. CASH-X has a policy under which employee misuse of Personal Information is treated as a serious offence for which disciplinary action may be taken.

Regarding electronic transmission of Personal Information there is no method of transmitting or storing data that is completely secure. Although CASH-X and its locations across Canada, use all available technological security in the transmission of Customer's data, all Internet transmissions are susceptible to possible loss, misrouting, interception and misuse. Before Personal Information is transferred or disclosed by electronic transmission, consent to such means of transfer will be sought from the Customer.

8. ACCESS TO PERSONAL INFORMATION

CASH-X permits a Customer to access and review the Personal Information it holds about the Customer upon receipt of a written request to the Chief Privacy

Officer. CASH-X reserves the right to refuse access to Personal Information about a Customer where the information requested:

- a. Concerns another individual or Customer of CASH-X and no consent has been granted by that Customer for such access;
- b. May harm or interfere with law enforcement activities and other investigative functions of a body authorized by statute to perform such functions;
- c. Is subject to solicitor-client or litigation privilege; or
- d. Does not exist, is not held, or cannot be found by Cash-X.

Where Personal Information will not or cannot be disclosed, the Customer making the request will be provided with reasons for the non-disclosure.

CASH-X reserves the right to decline to respond to repetitious or vexatious requests for access. In determining whether a request is repetitious or vexatious, it will consider such factors as the purpose for which the Personal Information was collected and used, the nature of the information being requested by the Customer, and the frequency with which the Customer repeats the same or similar access request.

To protect against fraudulent requests for access, CASH-X will require sufficient information or proof of identification from the Customer before granting access or making corrections to the Customer's Personal Information.

Where a request for access to a Customer's Personal Information is granted, Cash-X will endeavor to provide the information in question within a reasonable time and no later than 60 days following receipt of the written request and confirmation of the Customer's identity. CASH-X may charge a nominal cost to the Customer making the access request to cover photocopying or mailing costs, if necessary. Where a Customer requests deletion of Personal Information held by Cash-X, CASH-X reserves the right to refuse such a request to the extent that its retention of Personal Information is any law.

9. AMENDMENT TO CASH-X PRIVACY POLICY AND PROCEDURE

This Privacy Policy is in effect as of January 1, 2004. CASH-X recognizes that legal interpretation of PIPEDA and future Provincial privacy legislation may impact its privacy policies and procedures. The Chief Privacy Officer will review and revise this Privacy Policy from time to time, and notification of any revisions will be posted on Cash-X's Internet web site, as well as communicated to Cash-X's locations across Canada. Privacy Policy changes will apply to the Personal Information collected from the date of posting of the revised Policy Statement to Cash-X's Internet web site.

10. COMPLAINT PROCESS

Any concern or complaint by a Customer about a CASH-X location's or employee's management of the Customer's Personal Information should be directed to the Chief Privacy Officer, in writing. All complaints received by the Chief Privacy Officer will be investigated promptly and the Customer will be advised of the results of the investigation. Where corrective or disciplinary action is indicated by the Chief Privacy Officer's investigation, CASH-X will undertake to take such corrective and/or disciplinary action promptly.

If the Customer is dissatisfied with the answers received from the Chief Privacy Officer's investigation, or feels that the corrective action taken by CASH-X is

insufficient, the Customer may direct a complaint to the Federal Privacy
Commissioner by writing to:
The Privacy Commissioner of Canada
112 Kent Street
Ottawa, Ontario K1A 1H3