

Brim Privacy Policy

This Privacy Policy has been prepared by Brim Financial Inc. (“Brim”, “we”, “us”, “our”) and sets out the manner in which Brim collects, uses, discloses and otherwise manages personal information of its cardmembers, applicants and other users/ visitors (“you”, “your”). This Privacy Policy sets out our privacy practices on our website available at www.brimfinancial.com (“Website”) our mobile application(s) (“App(s)”), collectively the “Sites”, and through other interactions with you.

Collection and Use of Personal Information

We collect personal information directly from you (such as information you provide to us on your credit card application) as well as from third parties such as credit bureaus or current or former employers.

Credit Card Application: When you apply for a credit card account, we collect information you provide on your application form including your first and last name, mailing address, telephone numbers, email address, date of birth, occupation and employment-related information (such as current employer, job title and annual income), your social insurance number (if you choose to provide it, see Social Insurance Numbers below). We may also collect optional information such as your expected transaction volume and purpose for using the card in order to recommend suitable products for you. At the time you complete a credit card application, you will also be asked to provide your consent for us to conduct a credit check (see section on Credit Reports below). If you choose to add an authorized user to your account, we also collect the authorized user’s first and last name, relationship to you, home phone number, date of birth, mailing address and spending limit (if applicable). You are responsible for ensuring that you have obtained the consent of any additional cardmembers to provide their information to us.

We or our authorized service providers collect and use personal information in your application for the purposes of assessing your application and determining your eligibility for a credit card and creditworthiness, verifying your identity and the information provided on your application form, approving, opening, administering, servicing and enforcing your Cardmember Agreement (including collecting outstanding debts, detecting, suppressing and preventing fraud and other unauthorized or illegal activities), complying with applicable legal, regulatory and security requirements, managing risk, administering our anti-money laundering program and your participation in our rewards program, communicating with you about your card, sending you billing statements (in electronic or paper form in accordance with your choice) and as otherwise required or permitted by applicable law.

Social Insurance Number: Providing your social insurance number is optional. However, if you choose to provide it, we use it to assist us in identifying you with credit reporting agencies in order to retrieve an accurate report.

Account Activity Information: We collect transactional information about your and any additional cardmember’s use of the Brim credit card, including purchases, account balances, fees, payment history, and usage information for the purposes set out above, to provide you with an accurate billing statement and, in some circumstances, to facilitate merchandise returns. We may also use this information to provide you with tailored rewards offers and communications.

Credit Reports: At the time you complete a credit card application, we will obtain your consent to collect credit and other personal information from consumer and credit reporting agencies. This may include information about the types and amounts of credit advanced to you, payment histories, negative banking items, collection actions, legal proceedings, previous bankruptcies and other information reported by creditors. We use this information to assess your application, verify your current and ongoing creditworthiness, help us to determine your eligibility for a credit card, and to manage and assess our risks. You authorize such credit bureaus and consumer reporting agencies to provide such information to us. We also exchange personal information with consumer and credit reporting agencies on an ongoing basis (including negative information such as late payments, missed payments or other defaults). This consent is effective as of the date of submitting this application and, if you are issued a credit card account by Brim, continues to be effective as long as you have such account with Brim. The credit reporting agencies from which Brim may obtain your credit information include the following and you can obtain a copy of your credit report by contacting these credit reporting agencies:

TransUnion:

<http://www.transunion.ca/>

For English correspondence: TransUnion, Attention: Consumer Relations, P.O. Box 338, LCD1, Hamilton, ON L8L 7W2, 1-800-663-9980.

French correspondence: TransUnion, Centre de relations au consommateur, CP 1433 Succ. St-Martin, Laval, QC H7V 3P7, 1-877-713-3393 or 1-514- 335-0374 (Montreal).

Equifax:

<http://www.equifax.ca> Equifax Canada Co.

Box 190, Jean Talon Station

Montreal, Quebec, H1S 2Z2 1-800-465-7166

Balance Transfer: Certain credit cards may permit you to transfer your balance to your Brim card. If you choose to take advantage of this feature, we will collect information about the credit card from which you wish to transfer, including the name of the credit card issuer, the credit card number and the amount that you wish to transfer. We use this information to facilitate the balance transfer to your Brim card.

Online Account: If you or an additional cardmember choose to register for an online Brim account, we may collect your name, credit card account number, date of birth, postal code, phone number, email address, as well as a username and password that you create. We may also ask for your responses to a number of security questions. We use this information to authenticate you and create and administer your online account. With your consent, we may also use your email address to send you electronic statements or account alerts.

Rewards Program: Brim may offer a rewards program with its credit card, in which case your (and any additional cardmember's) card will be automatically enrolled in the rewards program once your credit card application is approved. All cardmembers will earn rewards at merchants that accept Mastercard, however,

only primary cardmembers are eligible for points redemption. We collect information about your and any additional cardmember's purchase transactions made using your Brim card (i.e. amount spent at a particular store) for the purposes of administering your and any additional cardmember's participation in the rewards program, including the earning and redemption of points, and communicating with you and any additional cardmember about your membership. We may also use this information to provide you and any additional cardmember with tailored earning and redemption reward offers within Brim's Website and, if you or an additional cardmember consent, by email, text message or in-app notifications. From time to time, we may supplement the personal information of our cardmembers with information from publicly available sources in order to better understand our cardmembers preferences and interests and tailor offers to them. We may also offer the option to upload paper receipts for storage purposes and we may use this information to send tailored offers based on purchase behaviour. For more information, see the Brim Open Rewards Program Terms and Conditions available at brimfinancial.com.

Email, SMS Text Messaging and Other Marketing Communications: We may provide you (or an additional cardmember) with the opportunity to sign-up for various types of marketing communications, such as information about Brim products and services, reward program offers (including offers at participating merchants) or marketing offers from our merchant or retailer partners. These communications may be sent by email, text messaging, in-app notification, telephone or direct mail and may be tailored to your interests, preferences and purchase behavior. You may opt-out of receiving future marketing and promotional communications at any time by clicking on the unsubscribe link included in our email communications, replying STOP in any SMS text message communication or by managing your communication preferences on Brim's Website. Please note that if you unsubscribe from marketing communications, you may continue to receive certain transactional or account-related electronic communications from us. If you have signed up to receive marketing communications from Brim, your email address and other information may be used to serve tailored ads to you and/or others on social media and other platforms, and we may provide a hashed version of your email address or other information to the platform provider for such purposes. To opt-out of the use of your email address for this type of advertising, contact us at privacy@brimfinancial.com.

Call Recording: We may monitor and record our telephone conversations with you for training and quality assurance purposes and for our mutual benefit. You will be provided with a notice at the beginning of any call that is being recorded. If you do not wish to have your call recorded, please let us know.

Account Alerts: You will receive alerts (such as transaction activity alerts, account update or fraud alerts, budget alerts, or general account information alerts) by email, SMS text message, or in-app notifications. We collect your email address or mobile phone number at which you would like to receive the alerts. We use this information in order to deliver the alerts and administer your participation in the alerts program. You can change your alert notifications or unenroll at any time on Brim's Website.

Contests and Promotions: From time to time, we may offer contests or promotions. If you enter a contest or participate in a promotion, we may collect your name, address, phone number, email address, and other information you provide in order to administer your participation in the contest or promotion.

Survey and Customer Research: We may offer you the opportunity to participate in one of our surveys or other customer research. The information obtained through our surveys and customer research will be used in an aggregated form to help us understand our customers and to enhance our product and service offerings.

Customer Service: When you contact us with a comment, question or complaint, you may be asked for information that identifies you (such as your name, address and a phone number) as well as additional information we need to help us answer your question or respond to your comment or complaint. We may retain this information to assist you in the future and to improve our customer service and product and service offerings.

Employment: In connection with a job application or related inquiry, you may provide us with certain personal information about yourself (such as that contained in a resume, cover letter, or similar employment-related materials). This information will be used for the purpose of processing and responding to your application for current and future career opportunities.

Disclosure and Sharing of Personal Information

We will not disclose, trade, rent, sell or otherwise transfer your personal information, without your consent, except as otherwise set out herein.

Service Providers: Personal information may be transferred (or otherwise made available) to our affiliates and other third parties who provide services on our behalf. For example, we use service providers to provide services such as transaction and payment processing, customer service call centre and other customer care services, debt collection, advertising services, reward program administration, credit risk assessment, printing and mailing statements or new and replacement credit cards, verifying or authenticating your identity and information you have provided to us, fraud detection and suppression, sending email, SMS text messages or other communications, hosting our website or managing and analyzing data and our advertising effectiveness. Our service providers are given the information they need to perform their designated functions, and are not authorized to use or disclose personal information for their own marketing or other purposes.

Personal information may be maintained on servers located in the United States (“US”) and processed by us, our affiliates and other third party service providers in the US or other jurisdictions.

Rewards Program: We may exchange personal information about your account or your participation in the Rewards Program with other parties as required to administer the rewards program, such as participating partners and merchants.

Legal/Compliance: Brim, its affiliates and its Canadian, US and other foreign service providers may provide personal information in response to a search warrant or other legally valid inquiry or order (which may include disclosure to US or other courts, law enforcement and government authorities in accordance with the laws of those jurisdictions), or to another organization for the purposes of investigating a breach of an agreement or contravention of law or detecting, suppressing or preventing fraud, or as otherwise required or permitted by applicable Canadian, US or other law. Personal information may also be disclosed where necessary for the establishment, exercise or defence of legal claims and to investigate or prevent actual or suspected loss or harm to persons or property.

Sale of Business: Personal information may be provided to third parties in connection with a proposed or completed acquisition, securitization, assignment or sale (including transfers made as part of insolvency or bankruptcy proceedings) involving all or part of Brim or our assets (including your loan agreement) or as part of a corporate reorganization, share sale or other change in corporate control. The personal information we may disclose in such circumstances includes financial information obtained in support of your ap-

plication or loan. Our successors or assigns may collect, use and disclose personal information for purposes similar to those described in this Privacy Policy or as otherwise permitted or required by applicable law.

Co-Branded Cards: If you have a BRIM credit card that is co-branded with another entity, we may share your personal information with that entity. That entity may use this information to (i) identify and inform you of other products and services that may be of interest to you; (ii) identify and inform you of other BRIM products and services that may be of interest to you; and (iii) provide you with customer service in relation to your credit card.

Information and Analytics on our Sites

In general, you can visit our Sites without telling us who you are or submitting any personal information. However, we collect the IP (Internet protocol) addresses of all visitors to our Sites and other related information such as page requests, browser type, operating system and average time spent on our Site. We use this information to help us understand activity on our Site, to provide you with content relevant to your jurisdiction and to monitor and improve our Site. If you download and install one of our Apps, we also collect information about your mobile device. This data includes the type of device hardware and operating system, unique device identifier (such as MAC address), IP address, language settings, and the date and time the App accesses our servers. We use this data in order to enable our Apps to function on your device, to provide the services you request and to improve our App.

We may also use third parties to help us gather and analyze information about the areas that you visit on our Sites in order to evaluate and improve the customer experience and the convenience of our Sites.

We or our service providers may collect information using tracking technologies, including:

Cookies, Tracer Tags & Web Beacons

Our Sites use a technology called “cookies”. A cookie is a tiny element of data that our Sites can send to your browser, which may then be stored on your hard drive so we can recognize you when you return. We use cookies on the pages on our Sites where you are prompted to log in or that are customizable. If you have registered with our Sites, these cookies (1) may let us know who you are, (2) may be necessary to access your account information (stored on our computers) in order to deliver products and personalized services, and (3) will provide us and our service providers with information that we will use to personalize our Sites in accordance with your preferences. We and our service providers also use cookies to help us understand our website activity, to improve our Sites and provide better customer service.

You may set your Web browser to notify you when you receive a cookie or to not accept certain cookies. However, if you decide not to accept cookies from our Sites, you may not be able to take advantage of all of the features of our Sites.

Our Sites may also use a technology called “pixel tags”, “tracer tags” or “Web Beacons”. This technology allows us to understand which pages you visit on our Sites in order to help us optimize and tailor our Sites for you and other future visitors to our Sites. We may also use this technology in emails to help us confirm the receipt of and response to our emails, the time our email is viewed, and “click-through” information such as where you click email links.

Location Based Services: If you consent, we may collect your actual location while you are using one of our Apps in order to provide you with the location-based service you requested (such as to show you nearby offers). To disable the collection of location data, visit the settings on your mobile device or in our App.

Online Ads/Interest Based Advertising

We may use third parties such as ad networks and other advertising companies to serve advertisements on our Sites or in our email communications, and on other websites and apps (including social media sites such as Facebook and Twitter). These companies may use cookies, tracer tags or web beacons to report certain information about your visits to our Sites and other websites and apps (such as web pages you visit and your response to ads) in order to measure the effectiveness of our marketing campaigns and to deliver ads that are more relevant to you, both on and off our Sites (including on social media sites).

Opting Out: To learn more about online behavioural advertising or to opt out-of having your information collected and used for online behavioural advertising purposes by companies participating in the Digital Advertising Alliance of Canada, please visit <http://youradchoices.ca/choices> or <https://youradchoices.ca/appchoices/> (to control interest-based advertising across mobile apps). To successfully opt out, you must have cookies enabled in your web browser (see your browser's instructions for information on cookies and how to enable them). Your opt-out only applies to the web browser you use so you must opt-out of each web browser on each computer you use. Once you opt out, if you delete your browser's saved cookies, you will need to opt-out again.

Please note that if you opt-out of OBA, you may still receive online advertising from us but it will not be based on online behavioural information about you.

Links to Other Sites

Our Sites may contain links to other websites that we do not own or operate, including social media websites. Also, links to our Sites may be featured on third party websites on which we advertise. Except as provided herein, we will not provide any of your personal information to these third parties without your consent. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. The linked websites have separate and independent privacy statements, notices and terms of use, which we recommend you read carefully. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your personal information.

Safeguards and Retention

We have implemented reasonable administrative, technical and physical measures in an effort to safeguard the Personal Information in our custody and control against theft, loss and unauthorized access, use, modification and disclosure. We restrict access to your personal information on a need to-know basis to employees and authorized service providers who require access to fulfil their job requirements.

We have Personal Information retention processes designed to retain Personal Information of our customers for no longer than necessary for the purposes stated above or to otherwise meet legal requirements.

You are responsible for safeguarding your credit card and PIN against loss, theft or misuse, and for not disclosing your PIN to anyone. To safeguard your PIN, you must (i) keep your PIN separate from your card; (ii) not voluntarily disclose your PIN to anyone; and (iii) you must not select a PIN that is easily identifiable, can be guessed or can be selected from your birth date, a phone number, birth date, social insurance number or a PIN that you use for any other accounts you may have.

If your credit card or PIN is lost or you believe it may have been used in an unauthorized manner, you must report this to us immediately at 1-866-305 BRIM (2746) or (647) 251-BRIM (2746) (collect) outside of Canada and the U.S. so that we can take steps to prevent further use of your card. Please note if we believe your card is being used for fraudulent or other unauthorized purposes, we may also prevent your card from being used without notifying you.

Access to and Correction of Your Personal Information

You have the right to access, update, and correct inaccuracies in your Personal Information in our custody and control, subject to certain exceptions prescribed by law.

You may request access, updating and corrections of inaccuracies in Personal Information we have in our custody or control by emailing or writing to the Chief Privacy Officer at the contact information set out below. You may also update certain contact information by logging into your account on Brim's Website. We may request certain Personal Information for the purposes of verifying the identity of the individual seeking access to their Personal Information records.

Changes to the Privacy Policy

This Privacy Policy may be updated periodically to reflect changes to our Personal Information practices. We will post the updated Privacy Policy on our Sites.

Contact Us

Please contact our Chief Privacy Officer if: you have any questions or comments about this Privacy Policy, you wish to access, update, and/or correct inaccuracies in your personal information, or you otherwise have a question or complaint about the manner in which we or our service providers treat your personal information.

You may contact our Chief Privacy Officer at privacy@brimfinancial.com or at Brim Financial Inc., 4101 Yonge Street, Suite 506, Toronto, Ontario, M2P 1N6.

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