

# WESTERN UNION FINANCIAL SERVICES (CANADA), INC.

## PRIVACY STATEMENT

Effective Date: May 23, 2016

This Privacy Statement describes how Western Union Financial Services (Canada), Inc. (“**Western Union Canada**”, “**we**”, “**us**” and “**our**”) collects, uses, transfers and discloses Personal Information we obtain from you when visiting our websites, or that we otherwise collect about you, including in connection with providing Western Union® and Vigo® products or services to you. “Personal information” is information about an identifiable individual, as more particularly defined or limited under applicable Canadian privacy legislation.

For purposes of this Privacy Statement, “Affiliates” mean companies related by common ownership or control. They can be financial and nonfinancial companies. “Non Affiliates” mean companies not related by common ownership or control. They can be financial and nonfinancial companies.

## INFORMATION WE COLLECT

Western Union Canada collects Personal Information about you from a variety of sources, including but not limited to those listed below. We collect Personal Information:

- That you supply via telephone, mobile apps, our websites, paper-based forms or at Western Union agent locations.
- That you submit on applications or other forms to us or our Affiliates, including in connection with sending and receiving money transfers, through your enrollment and participation in loyalty programs, or when you otherwise submit Personal Information to us, our Affiliates or others.
- In connection with your online activity, use of our and other websites and mobile apps.
- When you enter a promotion, register for email alerts or marketing communications.
- In connection with identity verification, fraud prevention, credit verification and similar security purposes, including through third parties sources such as our business customers, government agencies and consumer reporting agencies.
- To respond to court orders and legal investigations; report to credit bureaus; validate your creditworthiness or your identity; or as otherwise permitted or required by law.

The types of Personal Information we collect depend on the product or service you have with us, including information required to send or receive a transaction. This can include, without limitation:

- government identification numbers, such as driver’s license, state identification, passport, visa, Social Security or tax identification number, and date of birth
- name, address, email address, mobile and home telephone number, age, date of birth, gender, citizenship, occupation and marital status
- account balances and transaction history, including confirmation that a transaction occurred or that you hold a deposit account, the account or document number and the date, time, amount and nature of the transaction and any other information as required under applicable law
- banking, credit and payment history and information

- security questions used to verify your identity for security and fraud prevention purposes
- loyalty program information
- computer and mobile device information, such as the domain and host you use to access the Internet; your computer's IP address; mobile device geolocation, number and other information from and about your device (such as device properties, settings, applications, stored information and usage) and carrier; the browser and operating system software you use; social profile and network information; website access, usage and performance information including the date and time you access our websites and the Internet address used to link to our websites when you visit us, and cookie information

You agree to the processing of your Personal Information for the purposes and ways described in this Privacy Statement including the transfer of your Personal Information outside of the country where you may have accessed our websites, including but not limited to, the United States.

## HOW WE USE PERSONAL INFORMATION

Western Union Canada uses Personal Information for the following purposes:

- To provide, deliver and assist us in providing, managing and delivering products and services to you (including money transfers, payment services, loyalty programs, and other Western Union products or services) and to help us improve and develop these services;
- To verify any of the information you provide in order to effect, process, administer and enforce transactions, to manage our customer relationships, to confirm your eligibility for any services, or products you apply for, and to maintain accuracy of our records;
- To comply with legal and regulatory obligations including those aimed at preventing money laundering and related criminal or suspected criminal activity;
- To enhance your website experience including to store your preferences, passwords and other information; to track activity on our and other websites; to better understand the effectiveness of our promotional campaigns; to determine whether you came to our site from a banner ad or an affiliate website; to deliver information specific to your interests on additional websites, to determine whether you acted on our promotional messages;
- To improve the running of our websites, to improve the customer experience and the operation of our business;
- For marketing and promotional purposes, as described in the section entitled "Offers, Promotions and Opting Out" below.

## INFORMATION WE DISCLOSE

We may disclose your Personal Information as follows:

- To Western Union Affiliates;
- To organizations which help us process transactions, validate customer information, and help us prevent debt, fraud, theft or loss;
- To any receiver bank, intermediary banks, or other financial institutions or financial services companies involved in the transaction or our services to process and complete requested money transfers and payments.

- As permitted or required by any applicable laws and regulations.
- Western Union and our Affiliates worldwide may disclose your Personal Information (i) if we are required to do so by domestic or foreign law or legal process, or (ii) to law enforcement authorities or other government officials (including those in this country, the United States or elsewhere) for purposes such as detecting, investigating, prosecuting and preventing crimes, including money laundering and related criminal activity, and the recipients may further disclose the personal information for these and other purposes;
- To the recipient of a money transfer or payment, to local Western Union Affiliates and agents at the sender's and/or receiver's location.
- In accordance with applicable laws, to third parties for marketing and promotional purposes, as described in the section entitled "Offers, and Promotions and Opting Out" below.
- To companies and service providers that perform services on our behalf, for example to help us run or improve the running of our business; help us deliver products and services to you; help administer our loyalty programs; and to providers of marketing, information technology and/or data hosting or processing services. We take reasonable measures to ensure that Personal Information that may be processed by these service providers on our behalf is protected and not used or disclosed for purposes other than as directed by us, subject to legal requirements in Canada, the United States and other foreign countries applicable to Western Union Canada's Affiliates, agents and service providers.
- To parties connected with a contemplated or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of our business or assets (including, for example, your service account with us), for purposes related to the evaluation and performance of these transactions.
- In order to comply with legal, insurance, audit, regulatory, security and processing, government and foreign government requirements applicable to us, our Affiliates or service providers. This may include lawful requirements to disclose Personal Information to government authorities in Canada and in foreign countries, for example, disclosures in compliance with suspicious activity reporting requirements under anti-terrorism, anti-money laundering and similar laws and regulations in Canada or in foreign countries.

Law enforcement in Canada and in foreign countries may, without your consent (or our consent), communicate information to other authorities, including the police forces, for example, if there is reasonable cause to believe that a criminal or penal offence has been committed or is about to be committed.

Law enforcement may communicate, without your consent (or our consent) information to governmental bodies or agencies identified in the law for the prosecution of offences, for the prevention, detection or repression of crime or for any other purposes set forth in the law.

## OFFERS, PROMOTIONS AND OPTING OUT

Western Union Canada may use your Personal Information and information about your use of our services (e.g. frequency, value of money transfer, or destination country) for marketing and solicitation purposes to send you offers, promotions or information about additional products and services of Western Union Canada, our Affiliates and Non Affiliates that may be of interest to you, in accordance with applicable laws. In addition, Western Union Canada may, with your consent, disclose your contact details to third parties to permit those organizations to offer and provide information about their products and services that may interest you. These Affiliates and Non Affiliates may include, as examples:

- Western Union Canada Affiliates.
- Authorized Western Union agents.
- Financial services companies, such as banks, credit card companies, brokerage houses, mortgage lenders and mortgage originators.
- Non-financial companies such as retailers, home furnishers, clothing stores, catalogue companies, florists, direct marketers, telephone companies, airlines, publishers and other providers of goods and services.

You may “opt out” or withdraw consent to the use and/or disclosure of your Personal Information for the purposes described in this section at any time by contacting us as described in “Contact Us” below.

While you may opt out of use and disclosure of your Personal Information for marketing purposes, you may not opt out of the use and disclosure of your Personal Information for service and transactional related purposes, including the receipt of service and transactional related communications, and other purposes required or permitted by law.

## COOKIES & INTERNET TECHNOLOGY

We, our service providers and other third parties may use internet technologies such as cookies, pixels and web beacons to facilitate the services we provide on our websites and your use of our websites, including:

- To assist us in providing services to you;
- To track activity on our websites or apps and third party websites and apps;
- To allow you to move between web pages during your visit without having to re-enter your password, to store your preferences and other information, to personalize the content of the websites or apps for you, and to allow you to access account information;
- To better understand the effectiveness of our promotional campaigns;
- To determine whether you came to our websites or apps from a banner ad or a third party website or app;
- To deliver information specific to your interests via email, through our websites or apps, and on third party websites and apps; and
- To determine whether you have acted on our promotional messages.

We also have relationships with advertising companies, who may use cookies, pixels, web beacons, app or device information or related information to display advertising tailored to your interests or location. To learn more about this type of advertising, visit the Network Advertising Initiative at [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices). To opt-out of tailored advertising delivered by other advertising companies, you should choose the appropriate settings in your browser(s) (e.g., block cookies), device (e.g., turn “Location” off) and app(s). Please note that if you do not accept cookies or change your device or app settings, you may experience some inconvenience in your use of our websites or apps and some online or mobile products and services.

## CHILDREN’S PRIVACY

Our websites are not directed at children under the age of 13. Western Union Canada does not knowingly collect or maintain Personal Information at our websites from those we actually know are under the age of 13.

## EXTERNAL WEBSITES

Our websites may be linked to or from third party websites. Western Union Canada is not responsible for the content or privacy practices of websites that are linked to or from our websites. You are advised to review the privacy policies of any third party websites you visit.

## YOUR CONSENT

Consent to the collection, use and disclosure of Personal Information may be given in various ways. Consent can be express (for example, orally, electronically or on a form you may sign describing the intended uses and disclosures of Personal Information) or implied (for example, when you provide information necessary for a service you have requested). You may provide your consent in some circumstances where notice has been provided to you about our intentions with respect to your Personal Information and you have not withdrawn your consent for an identified purpose, such as by using an “opt out” option provided, if any. Consent may be given by your authorized representative (such as a legal guardian or a person having a power of attorney).

You may withdraw your consent to our collection, use and disclosure of Personal Information at any time, subject to contractual and legal restrictions and reasonable notice. Note that if you withdraw your consent to certain uses of your Personal Information, we may no longer be able to provide certain of our products or services. Note also that where we have provided or are providing services to you, your consent will be valid for so long as necessary to fulfill the purposes described in this Privacy Statement or otherwise at the time of collection, and you may not be permitted to withdraw consent to certain necessary uses and disclosures (for example, but not limited to, maintaining reasonable business and transaction records, disclosures to Canadian and foreign government entities as required to comply with laws, and reporting on credit information after credit has been granted, if applicable).

We may also be required or permitted under statute or regulation to collect, use or disclose Personal Information without your consent, for example to comply with a court order, to comply with local or federal regulations or a legally permitted inquiry by a government agency, or to collect a debt owed to us.

## CONFIDENTIALITY AND SECURITY

We endeavor to maintain reasonable physical, technical and procedural safeguards to help protect Personal

Information against loss, theft, unauthorized access, disclosure, copying, use or modification. We also endeavor to limit access to Personal Information to only employees, agents and representatives that need to know. Despite our efforts, third parties may unlawfully intercept or access your Personal Information, transmissions to us, or may wrongly instruct you to disclose information to them by posing as Western Union or by misinforming you about our services. Always use caution and good judgment when sending money and when using Internet and mobile technologies.

#### ACCESS AND CORRECTION

You may request access or correction of your Personal Information in our custody or control by contacting us in the manner set out below. Your right to access or correct your Personal Information is subject to applicable legal restrictions. To help protect your privacy and security, we may require additional information when trying to verify your identity.

#### CHANGES

Western Union Canada reserves the right to modify this Privacy Statement from time to time. Updates to this Privacy Statement will be posted at this website when amendments occur. You can also obtain updated Privacy Statements by contacting us in the manner set out below. We urge you to review this Privacy Statement frequently to obtain the current version. Your continued provision of Personal Information or use of our services following any changes to this Privacy Statement constitutes your acceptance of any such changes.

#### CONTACT US

##### BY MAIL:

Western Union Financial Services (Canada), Inc.,  
330 Bay Street | Suite 300  
Toronto, ON | M5H 2S8, Canada

##### BY TELEPHONE:

1-800-235-0000

##### ONLINE:

westernunion.ca. Log into your account and edit your Profile settings.

##### EMAIL:

privacy@westernunion.com