

## **Privacy Policy**

This Privacy Policy (together with the creditoptimizer Terms of Use) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting creditoptimizer.easyfinancial.com (our site) you are accepting and consenting to the practices described in this policy.

### **Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.

### **Information We May Collect From You**

We may collect and process the following data about you (User Data) in various ways:

- Information you give us. You may give us information about you by filling in forms on our site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, search for a product, place an order on our site, participate in discussion boards or other social media functions on our site, enter a competition, promotion or survey, and when you report a problem with our site, we may keep a record of that correspondence. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information, personal description and photograph. Some User Data will inevitably comprise personal data about you and may include sensitive personal data. Personal data is information which relates to you and allows you to be identified from that data (or from a combination of those data and other information in our possession. Sensitive personal data is information about or which reveals your racial or ethnic origin, political opinions, religious, philosophical or similar beliefs, trade union membership, physical or mental health, sexual life, commission of criminal offences and/or involvement in criminal proceedings
- Information we collect about you. With regard to each of your visits to our site we may automatically collect the following information:
  - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform which are statistical data about our users' browsing actions and patterns, and does not identify any individual;
  - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- Information we receive from other sources. We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

## **Where We Store Your Personal Data**

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

By continuing to use this website or our services and by providing any personal data (including sensitive personal data) to us via this website or e-mail addresses provided on this website, you are consenting to such transfers, provided that they are in accordance with the purposes set out above and elsewhere in the Legal Notices. Please do not send us any personal data if you do not consent to the transfer of this information to locations outside the User Jurisdiction (including, if applicable, outside Canada).

## **Uses Made of the Information**

We use information held about you in the following ways:

- Information you give to us. We will use this information:
  - to carry out our obligations arising from any contracts entered into between you, third party suppliers and us and to provide you with the information, products and services that you request from us;
  - to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
  - to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the order form OR registration form);
  - to notify you about changes to our service;
  - to ensure that content from our site is presented in the most effective manner for you and for your computer.
- Information we collect about you. We will use this information:
  - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;

- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- Information we receive from other sources.
- We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).
- We may also use your data, or permit selected third parties to use your data, to provide you with information about goods and services which may be of interest to you and we or they may contact you about these by post or telephone.
- If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale to you.
- If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by electronic means only if you have consented to this.
- If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data (the order form or registration form).

### **Disclosure of your information**

We may disclose your personal information to any member of our group, which means our parent, subsidiary and affiliated corporations, as defined in the Canada Business Corporations Act.

- We may share your information with selected third parties including:
  - Business partners, third party suppliers and sub-contractors for the performance of any contract we enter into with them or you.
  - Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target (for example, women in SW1). We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience.
  - Analytics and search engine providers that assist us in the improvement and optimization of our site.
  - Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets; and
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our Score Optimizer Terms of Use and other agreements; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction

### **Our Safeguarding Practices**

We take the protection of personal information seriously. We have adopted procedures to secure storage of personal information and are committed to working with our customers to protect the security of personal information during any transfer to or from us. Our authorized employees and representatives will have access to your personal information to the necessary extent needed to perform their job functions. We may retain your personal information in our data base for as long as necessary to fulfill the purpose(s) for which it was collected and to comply with the applicable laws.

### **Consent**

By continuing to use our services (whether directly or through third party arrangements) or this website and by providing any personal data (including sensitive personal data) to us, you are consenting to our use of your personal data as set out in this Privacy Policy. Please do not send us any personal data if you do not want that information to be used by us in this manner.

### **Your Rights**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

Under Personal Information Protection and Electronic Documents Act (the "Act") you have the right to request a copy of the personal information we hold about you and to have any inaccuracies corrected. (We may charge for a small fee for our costs incurred with such information requests and require you to prove your identity with 2 pieces of approved identification). We will use reasonable efforts to supply, correct or delete personal information about you on our files. We accept no responsibility or liability howsoever arising for the content or your use of such third party websites, or in relation to the redemption of any offers by third parties or similar. We will not be liable for any loss, damage or similar suffered or incurred by you arising from your use or access to of such websites.

**Access to Information**

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a small fee to meet our costs in providing you with details of the information we hold about you.

**Changes to Our Privacy Policy**

This Privacy Policy and/or the other policies may be amended and/or updated by us at any time. Please check this website periodically to inform yourself of any changes.

**Contact**

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to [support@scorenavigator.com](mailto:support@scorenavigator.com).