

LEAD BANK PRIVACY POLICY

LAST UPDATED: AUGUST 28, 2017

1. Privacy Policy Overview

Welcome to the Lead Bank Privacy Policy (the “**Privacy Policy**”). This Privacy Policy is incorporated in and forms a part of the Lead Bank User Agreement, as amended (the “**Agreement**”), between 1129421 B.C. LTD. (“**Lead Bank**”, “**us**”, “**we**” or “**our**”), the owner and operator of <http://www.leadbank.ca/> (the “**Site**”) and the Lead Bank mobile applications (“**Apps**”), and you (“**you**” or “**your**” or “**user(s)**”), a user of the Site and/or Apps (together, the “**Services**”). This Privacy Policy explains and governs how we collect, use, share and retain information and data through your use of the Services.

For reference, the Agreement is posted on the Site. Unless defined in this Privacy Policy, capitalized terms have the meanings ascribed to them in the Agreement. This Privacy Policy is subject to the terms and conditions of the Agreement.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. THIS PRIVACY POLICY CONSTITUTES A LEGALLY BINDING AGREEMENT BETWEEN YOU AND LEAD BANK, AND IS DEEMED ACCEPTED BY YOU UPON YOUR FIRST ACCESS, USE OR DOWNLOAD ANY OF THE SERVICES. FOR CERTAINTY, BY ACCESSING, USING OR DOWNLOADING ANY PART OR WHOLE OF THE SERVICES, YOU EXPRESSLY CONSENT TO OUR COLLECTION, USE, SHARING AND STORING OF YOUR PERSONAL INFORMATION ACCORDING TO THIS PRIVACY POLICY. IF YOU DO NOT ACCEPT THIS PRIVACY POLICY, DO NOT ACCESS, USE OR DOWNLOAD ANY OF THE SERVICES.

For the purposes of this Privacy Policy, “**Personal Information**” is information that can be associated with a specific person and could be used to identify that specific person whether from that data or other information that Lead Bank has or is likely to have access to, and includes without limitation personal health information. We do not consider Personal Information to include information that has been made anonymous or aggregated so that it can no longer be used to identify a specific person, whether in combination with other information or otherwise.

2. Information Collection

(a) General Use. We collect, process, and retain information from you and any devices (including mobile devices) you may use when you: register for an account with us; update or add information to your account; participate in community discussions, chats, or dispute resolution; engage or communicate with us, other users or third parties in connection with the Services; post or complete referrals and relationship management transactions using the Services; or otherwise access, use or download any part or whole of the Services. Such information includes without limitation:

- identifying information such as your name, address, telephone number and email address;
- information or content you provide in the course of using the Services, such as identifying information relating to any third party you are referring to another user of the Services;
- geographic or location information, which data may be precise or imprecise;
- content of your communications via the Services;
- financial information (such as credit card or bank account numbers) in connection with the Services;
- information relating to the performance of the Services you experience; and
- information you provide via web form, community discussion, chats and dispute resolution.

(b) Automatic Collection. By using the Services, we may automatically collect information about how you use the Services, the areas of the Services that you visit, as well as information about your computer or mobile device, such as your Internet protocol (IP) address, device ID, physical location, browser and operating system type, resolution of your screen, language settings in your browser, referring URLs, and other technical

information. This information is necessary for providing personalized and location-based content and services as well as for analyzing web traffic, troubleshooting problems, preventing fraud, and improving the Services.

- (c) Third Party Data. We may obtain data from third parties. We protect data obtained from third parties according to the practices described in this statement, plus any additional restrictions imposed by the source of the data and applicable laws. These third-party data sources vary over time, but may include without limitation: data brokers from which we purchase demographic data to supplement the data we collect; social networks when you grant permission to us to access your data on one or more networks, service providers that help us determine a location based on your IP address in order to customize certain products to your location, and partners with which we offer co-branded services or engage in joint marketing activities.
- (d) Feedback. Any suggestions or comments for improving or modifying the Services that are included in your communications with us (“**Feedback**”) will be deemed to be non-confidential and non-proprietary to you, and you agree that: (a) Lead Bank is therefore not subject to any confidentiality obligations with respect to the Feedback; (b) the Feedback is not confidential or proprietary information of any third party and you have all of the necessary rights to disclose the Feedback to us; (c) Lead Bank may irrevocably freely use, reproduce, publicize the Feedback; and (d) you are not, nor is any other party, entitled to receive any compensation or reimbursement of any kind from us in relation to the Feedback.

3. **Information Use**

You hereby consent to our using any of the information we collect on you (the “**Information**”), which includes without limitation your Personal Information:

- (a) to deliver our Services to you;
- (b) to improve our Services in order to better serve you;
- (c) to provide you with a personalized experience when using our Services;
- (d) to provide targeted advertising to you;
- (e) to appropriately respond to your communications and provide you with customer service;
- (f) to contact you about feature updates and informational and service-related communications;
- (g) for internal statistical, marketing or operational purposes, including without limitation generating sales reports and measuring and understanding demographic, user interest, purchasing and other trends among our customers; and
- (h) to detect, prevent, mitigate and investigate fraudulent or illegal activities, which includes without limitation enforcement of our Agreement (which incorporates this Privacy Policy).

4. **Information Disclosure**

- (a) General Privacy Policy. We will share your Personal Information with third parties only in the ways that are described in this Privacy Policy. In any event, any third party that receives your Personal Information in accordance with this Privacy Policy will be required to follow the privacy practices set forth herein. We minimize the amount of Personal Information we disclose to what is directly relevant and necessary to accomplish the specified purpose. Lead Bank retains ownership of any and all Information that is not Personal Information.
- (b) Other Users. When interacting with another user, the other user may request and we may provide him/her with your Personal Information as necessary for the ordinary use of the Services, such as your name, account ID, email address or contact details. The other user receiving your Personal Information is not allowed to use such information for purposes unrelated to the transactions or services engaged, such as to contact you for marketing purposes, unless you have expressly consented to it. Contacting users with unwanted or threatening messages is a violation of our Agreement. Other users may be provided Personal Information about you that is necessary to facilitate the ordinary use of the Services.

- (c) Service Providers. We may provide your Personal Information to third parties that provide services to help us with our business activities and the provision of the Services. For example, we may use third party service providers to help us analyze usage of our Services, provide personalized advertising, track the effectiveness of our marketing campaigns, strategies and communications, provide payment processing services, assist with the prevention, detection, mitigation and investigation of potentially illegal acts, violations of our Agreement (which incorporates this Privacy Policy), fraud and/or security breaches, collect and process error and crash reports, host web servers and store data. These third parties are authorized to use your Personal Information only as necessary to provide these services to us.
- (d) Lead Bank Reorganization. We may also disclose or transfer your Personal Information to an affiliate or a third party in the event of a proposed reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Lead Bank's business, assets or equity, including, without limitation, in connection with any bankruptcy or similar proceeding. In connection with same, your consent to the Agreement (which incorporates this Privacy Policy) is deemed transferable to the benefit of Lead Bank and its assigns, without notice to you.
- (e) Legal Disclosure. Subject to applicable laws in your jurisdiction, Lead Bank may also disclose Personal Information about you to others as we believe to be necessary or appropriate: (a) under applicable law or regulation, including laws or regulations outside your country of residence; (b) to comply with legal process, respond to legal claims; (c) to respond to requests from public authorities and law enforcement officials, including officials outside your country of residence; (d) to assist or support theft investigations involving our Services or property; (e) to enforce the Agreement (which incorporates this Privacy Policy); (f) to protect our operations or those of any of our affiliates; (g) to protect the rights, privacy, safety or property of Lead Bank, its affiliates, you and others; or (h) to permit us to pursue available remedies or limit the damages that we may sustain.
- (f) International Transfer and Storage. Your Information may cross international borders in order to facilitate the Services. In some cases, your Personal Information may be disclosed, processed, and stored outside Canada, and therefore may be available to government authorities under lawful orders and laws applicable there.

5. Information Security

We protect your Personal Information using technical and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, and information access authorization controls. If you believe your account has been abused, please contact us. Lead Bank follows generally accepted industry standards to protect the Personal Information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security.

6. Third Party Policies

This Privacy Policy addresses only the use and disclosure of Personal Information we collect from you. If you disclose your Personal Information to others, or if you engage any a third-party sites or services, such third-party's privacy notices and practices will apply.

We cannot guarantee the privacy or security of your Personal Information once you provide it to a third party and we encourage you to evaluate the privacy and security policies of each such third-party before any such engagement or disclosure. This is true even where the third parties to whom you disclose Personal Information are other users of our Services.

The Services may contain links to third party websites or applications that are not owned, maintained or operated by Lead Bank. Any such links are provided solely as a convenience to you and not as an endorsement by Lead Bank.

Lead Bank is not responsible for the content of such linked third-party websites or applications and does not make any representations, warranties or guarantees regarding the content or the privacy practices of such third parties. For certainty, Lead Bank disclaims any liability associated with your access to, use of, download of, or reliance on, such third-party websites or applications and their content. If you decide to access, use or download any such third-party website, application or content, you do so at your sole risk.

7. Cookies

We may use cookies, pixel tags, web beacons, or other similar tools on our Services or in our communications with you to help personalize and maximize your Lead Bank experience. We may also engage one or more third party service providers to provide online advertisements on our behalf. We may use, or authorize the use of cookies, pixel tags, web beacons or other similar technology to collect information about your visits to the Services, and we may use that information to send you targeted advertisements.

If you do not wish to accept cookies, you have the option of blocking or disabling cookies. Your computer provides you with the ability to clear all cookies that have been stored onto your hard drive, should you wish to do so. However, please be aware that you may be unable to access certain parts of the Services if you block or disable our cookies.

8. Marketing & Advertising

Unless you expressly opt-out, your acceptance of the Agreement (which incorporates this Privacy Policy) will be deemed consent to receive marketing communications from us via email or any other form of communication you have provided us contact information for. You may opt-out at any time by clicking “Unsubscribe” in any such communication or by contacting us.

9. Children

The Services are not intended for, nor does Lead Bank knowingly collect information from, children under the age of fourteen (14). If we learn that we have collected Personal Information from a child under fourteen (14), we will take steps to delete the information as soon as possible. If you are aware of a user under the age of fourteen (14) using the Services, please contact us immediately.

10. Withdrawal of Consent & Changes to Personal Information

Lead Bank takes reasonable steps to help ensure that the Personal Information we collect from you is accurate, complete and current. You may request access to your Personal Information and request that erroneous or inaccurate Personal Information be updated.

You may withdraw your consent for our collection, use and disclosure of your Personal Information at any time. If you wish to withdraw your consent, please contact us. This will affect your ability to access, use and download the Services. Your access to the Services will be revoked if you withdraw consent, and if you continue to use the Services thereafter, your consent to this Privacy Policy is deemed unconditionally renewed.

11. Data Retention

Lead Bank retains Personal Information for as long as necessary to provide the Services and fulfill the transactions you have requested, or for other essential purposes such as complying with our legal obligations, resolving disputes and enforcing our agreements. Because these needs can vary for different data types in the context of different products, actual retention periods can vary significantly.

After it is no longer necessary for us to retain your Personal Information, we dispose of it in a secure manner according to our data retention and deletion policies. We are not responsible for any liability or loss you experience as a result of our disposal of Personal Information.

12. **Contact Us**

If you have any questions about Lead Bank's privacy and data management policies, contact our Privacy Officer at info@leadbank.ca.