

# Our Privacy Policy and Credit Reporting Privacy Policy

## 1. Privacy at hummgroup – Our Privacy Policy and Credit Reporting Privacy Policy

### Background

At hummgroup (Humm Group Limited BN 795393149 (Canada)) it is important to us that we manage your personal information securely and consistently with relevant legislation, including the federal *Personal Information Protection and Electronic Documents Act* and provincial privacy laws (collectively, “**Privacy Acts**”) as well as the consumer credit reporting laws (where applicable).

This Policy outlines how hummgroup and its related companies (“we / us”) **collect, disclose, use, store or otherwise handle personal information.**

This Policy is effective as at November 2021. Sometimes we will update it – you can always find a current version at <https://www.shophumm.com/en-ca/privacy-policy/>.

This Policy explains:

- the kinds of personal information (including credit-related information) we collect, and the purposes for which we do that;
- how we manage the personal information that we collect about you;
- how you can seek access to and correction of that information; and
- if necessary, how you can make a complaint relating to our handling of that information.

This Policy is not limited to current customers or guarantors of customers (where applicable) – it relates to other individuals who deal with us, whether in relation to the provision of credit or otherwise.

#### What is personal information?

*Personal information* is information about an individual who is identified or reasonably identifiable (for example, your name and date of birth).

#### What is credit-related information?

*Credit-related information* (which includes credit information and credit eligibility information) is a type of personal information. This includes information from a credit report about you (or information which is derived from that report), your repayment history for loans from other credit providers, the amount of credit

## 2. Summary of important consents

You are deemed to have provided the following consents by agreeing to this Policy. If you do not wish to provide your consent to any of the matters listed below, please contact us immediately.

- You agree to the collection, use and disclosure of your personal information (including credit-related information) in accordance with the Privacy Policy.
- You agree to us using and disclosing your personal information (including your telephone number, and your email or other electronic addresses) to develop products and services you may be interested in, and to provide you with information about our other products and services and the products and services offered by our dealers, insurers, related companies, or suppliers. However, you can tell us that you no longer wish to use or disclose your personal information for these purposes by contacting us at [Customer.CA@shophumm.com](mailto:Customer.CA@shophumm.com).
- You agree to the disclosure of your personal information (including credit-related Information) to entities located outside Canada.
- You agree to us obtaining credit-related information about you from a credit reporting agency (including where you are a borrower applying for commercial credit or a guarantor).
- You agree to us disclosing credit-related information about you to a person for the purpose of that person considering whether to offer to act as guarantor in relation to the credit or to offer property as security for the credit or to any person who is a guarantor or has offered security in relation to credit provided by us to you.

- You agree to us disclosing your personal information (including credit-related information) to another credit provider for the purpose of assessing your application for credit or for any other purpose permitted by the Privacy Acts and consumer credit reporting laws.
- You agree that we can disclose your name, residential address, and date of birth to a credit reporting body so that the credit reporting body can provide an assessment to us of whether the information provided by you matches (in whole or in part) the information in the credit reporting body's possession or control (which may include personal information held by the credit reporting body about you or other individuals). This will be done for the purpose of verifying your identity as required under Australia's anti-money laundering and counter-terrorism laws where applicable. If you would prefer us to use another form of verification, such as your passport or driver's licence, you must notify us and provide us with any information that we request.
- You agree that your behavioural biometric data may be provided to a third party for the purposes of digital identity protection and fraud prevention.
- You consent that your session data may be provided to a third party for the purposes of digital identity protection and fraud prevention, including IP address, version of the operating system, brand and model of your device, unique identifiers of your device, browser used, information about the time the application was accessed, name and parameters of the network connection.
- You consent that information about applications installed on your device may be provided to a third party for the purposes of digital identity protection and fraud prevention, including application name, application identifier and version, device identifier and checksum.
- We may also verify your identity using electronic sources. In order to do so, we will ask you for your details (such as your name, address, and date of birth) and details of your identification documents.

This information will be passed to external organizations to electronically match your information with identification data on their databases including:

- government departments that issued or hold records relating to your identification document;
- independent, private-sector organizations; and
- outsourced service providers who co-ordinate the electronic identification process and who may conduct additional matches against public or proprietary databases.

These external organizations will record, use, and disclose your information in accordance with their own privacy policies and legal obligations.

Neither us nor our outsourced service providers will access records held about you by these external organizations other than for the purpose of matching the identifying information you have chosen to enter through this website.

### 3. Personal information we may collect

#### Personal information generally

We will collect certain information about you depending on the circumstances in which the product or service is being provided. This information can include:

- **key personal information** such as your name, gender, date of birth, residential and business addresses, telephone numbers, email, and other electronic addresses;
- **financial and related information**, such as your occupation, accounts, bank card information, assets, expenses, income, dependents, and regarding your employment, financial and business dealings, and other relevant events;
- **your transaction history** (with us and our related companies or relevant third parties). This information includes products you may have used, your payment history, and the capacity in which you have dealt or deal with us;
- **behavioral biometric data** which includes behavioral analytics on how you use and access our websites and mobile apps;
- Data required for high-quality and safe provision of services:
  - session data that is automatically collected and transmitted by our apps. Session data includes: your IP address, version of the operating system, brand and model of the device, unique identifiers of the device, browser used, information about the time our app was accessed, name and parameters of the network connection;

- information about applications installed on your device (metadata from applications) which includes application name, application identifier and version, device identifier and checksum;
- information about the geolocation of the user's device which includes geolocation data using GPS data, nearest Wi-Fi access points and mobile networks;
- call history on your device;
- information about applications installed on your device (metadata from applications) which includes application name, application identifier and version, device identifier and checksum; and
- **other relevant information** - depending on the circumstances this may also include health and medical information (e.g. if it is relevant to a hardship request), membership in professional bodies, Business Number or other government identifiers (e.g. if relevant to identifying you).

### Credit-related information

If we need to collect information about you in relation to credit matters, this can include:

- information such as account numbers or customer identifier numbers;
- credit reports from credit reporting bodies (“**CRBs**”);
- **credit application history with us and other credit providers**, such as the type of credit you applied for, the amount of credit you have applied for, the start and end date of relevant credit;
- **repayment history information**, such as whether you owe any payments to us or another credit provider (regardless of the capacity in which that credit was provided) that are overdue;
- credit ratings, scores and evaluations about you and your credit worthiness;
- **Court proceedings information about you**. This is information about a judgment of a relevant court that is made against you that relates to credit that was provided to, or applied for, by you, such as whether you have been declared bankrupt or have been subject to insolvency;
- whether we have accessed your credit information previously;
- **default information about you**. This is information about a payment owed by you as a borrower or guarantor in connection with consumer credit that remains overdue for more than sixty (60) days and which we can disclose to a credit reporting body if certain requirements under the Privacy Acts are met;
- **payment information about you**. Payment information is a statement that an overdue payment in relation to which default information was provided to a credit reporting body has been paid;
- **new arrangement information about you**. This is information about you having entered into certain types of arrangements with us in relation to consumer credit where you have been overdue in making a payment and we have provided default information to a credit reporting body. New arrangement information is either that the terms of conditions of that consumer credit have been varied as a result of you being overdue or that you have been provided with new credit relating to the original amount of credit;
- **personal insolvency information about you**. This is information relating to your bankruptcy, a debt agreement proposal given by you, a debt agreement made by you, a personal insolvency agreement executed by you, a direction given, or an order made, under the Bankruptcy and Insolvency Act that relates to your property or an authority signed under the Bankruptcy and Insolvency Act that relates to your property;
- **publicly available information about you:**
  - that relates to your activities in Canada and your credit worthiness; and
  - that we are permitted by law to collect or use.

If you do not provide us with your personal information (including credit-related information), we may not be able to provide products or services.

## 4. How we collect your personal information

In many circumstances, we will collect the above information primarily from you (or from someone who is representing or assisting you). However, there are certain instances in which we will collect information about you from third parties where it is unreasonable or impracticable to collect it directly from you. For example, even where your application is for consumer credit, we may collect information about you from a business which provides information about commercial credit worthiness for the purpose of assessing your application.

Other third parties that we may collect your information from include:

- our agents;
- your co-applicant (if any);
- your employers, accountant, referees, banks, landlords, guarantors, lawyers, financial advisers, or others with whom you have previously had dealings or persons assisting you who you direct to provide information to us;
- other **hummg**group entities or related companies who may have information about you;
- in relation to credit information – by contacting relevant CRBs and other credit providers who may have information about you relevant to us;

- in relation to identification information – by contacting relevant CRBs and other identification service providers;
- by accessing information about you that is publicly available (e.g. internet sources or a search of white pages);
- payment card processors;
- insurers (such as insurers who provide insurance in relation to your credit);
- your executor, administrator, or attorney;
- service providers to us (including debt collection agencies, introducers, private investigators, professional advisers);
- professional organizations;
- public and subscriber only databases;
- any person considered necessary in our view to execute your instructions; and
- government authorities.

## **5. How we hold and protect your personal information**

We will hold your personal information in paper or other physical form, but it is usually held in electronic form on our systems. Service providers may hold the information for us. Your personal information is protected by various physical, electronic, and procedural safeguards. Where a service provider holds your information, we require those service providers to adhere to our approved standards of security and confidentiality to ensure the continuing protection of your personal information.

No method of transmission over the internet, or method of electronic storage, is 100% secure. We take reasonable measures to protect personal information in our care. On an ongoing basis, we assess the risks associated with the collection, use and disclosure of personal information and we update our privacy and security practices as necessary. Should an unforeseen event occur, such as a data breach or harm caused by bad actors, we have procedures in place to identify, assess and minimize any further risks and determine if there is a real risk of significant harm to individuals.

We train staff who handle your personal information to ensure that your personal information is handled appropriately. Our procedures ensure that your personal information is only made available to staff where necessary.

## **6. Purposes for which we may collect, hold, use and disclose your personal information**

Personal information we collect about you will only be held, used, and disclosed as is reasonably necessary for our business purposes, with your consent, and/or as permitted by law.

Purposes for which we will usually hold, use, and disclose your personal information, depending on the circumstances and the nature and products and services you are obtaining from us, include:

- in order for us to decide whether to provide a product applied for or service requested (this might include evaluating your credit worthiness, or deciding whether to accept you as a guarantor);
- providing the products or services that we provide, including related arrangements (e.g. where we provide you with a credit to make a purchase, or where our product is a payment service, that includes arranging for the purchase to be paid for or the payment to be made);
- managing the products and services that we provide;
- the ongoing monitoring of credit worthiness;
- to identify the user of our apps and the user's device;
- to ensure the safety of using our apps and other services;
- to detect and prevent instances of fraud and identity theft, unlawful conduct, and other risks to you or our products and services;
- to ensure fast and accurate approval and processing of payment transactions including via cheque;
- to administer your insurance policy, assess any insurance risks or claims associated with you or our products or services;
- dispute and complaint resolution, and assisting other credit providers to do the same;
- enforcing our rights, including the collection of outstanding payments and where necessary, initiating legal proceedings;
- undertaking review and maintenance of our systems and infrastructure;
- undertaking research and development regarding new and potential products and services;
- undertaking securitization activities and other activities relating to funding and capital requirements;
- enabling our associated entities, related companies and selected other entities to promote their products and services to customers;
- meeting any legal and regulatory requirements we are subject to, or that may be imposed on us;

- marketing products and services provided by us and our related entities, including by sending notifications, requests and other information about the services provided by us;
- developing an understanding of the products and services you may be interested in receiving from us and our related entities;
- compiling statistical data e.g. credit scoring information;
- improving the quality of the apps and services provided by us;
- customer data analytics, which may be provided to or shared with any retailer or entity with which we have an alliance or partnership arrangement;
- providing or attributing loyalty points or benefits to you under a loyalty or other program that you are a member of (whether with us, a related body corporate, or a third party);
- participating in the credit reporting system and providing information to CRBs as permitted by the Privacy Acts and the consumer credit reporting laws;
- assisting customers in meeting their credit related obligations;
- enforcing our rights, including debt recovery and other enforcement;
- dealing with serious credit infringements, and assisting other credit providers to do the same; and
- complying with various Canadian laws which may specifically require us to collect your personal information, and other laws where collecting your information is necessary for us to comply with our obligations, such as:
  - consumer credit reporting laws;
  - anti-money laundering and counter-terrorism financing laws;
  - personal property, real property, and security interests laws;
  - corporate laws and other regulatory legislation; and
  - taxation laws.

## **7. Disclosing your personal information to third parties (including overseas)**

Where the Privacy Acts permit it, we may disclose your personal information (including credit-related information) for the purposes above to third parties. Other third parties that we may disclose your personal information to include:

- your co-applicant (if any)
- related entities based in Canada or overseas;
- entities that provide services to us such as mailing houses or call centre operators;
- entities providing other services to us, including legal services, financial services, market research and data providers;
- our assignees or potential assignees, or where we act as an agent for, or otherwise on behalf of, another person, to the principal or that other person;
- the supplier of any goods or services financed with credit we provide;
- retailers, where the payment or credit service provided by us involves payments to the retailer for goods or services to be provided by them;
- other financial institutions or entities such as banks and credit providers;
- identification service providers and providers of digital identity protection and fraud prevention;;
- insurers, assessors, underwriters, brokers, and other distributors;
- government regulatory bodies in Canada, and overseas;
- if appropriate, guarantee or security providers;
- organizations involved in debt assignment or securitization arrangements;
- debt collectors or other enforcement bodies;
- entities who wish to be involved in our business, or acquire an interest in our business;
- third parties you authorize to act on your behalf or that are otherwise connected with you (such as your accountant, legal representative, referee, or an access seeker acting on your behalf to obtain your credit report); and
- law enforcement agencies.

Some of these entities may not be located in Canada. For example, we employ service providers in countries such as Australia, the Philippines, New Zealand, the United Kingdom, and Ireland.

In addition, although many of the retailers we deal with are in Canadian, some of them are overseas. Therefore, when you ask us to make a payment to or to provide credit for a product or service from such a retailer, we will provide information to that retailer and also to banks and other financial institutions, who may also be overseas, who are involved in processing that payment. These entities are not our service providers, and we do not control how they manage your information.

## 8. Disclosing your credit-related information to third parties such as CRBs

Your consumer credit-related information may also be disclosed, where relevant, in many of the circumstances described above. In addition, where the Privacy Acts and consumer credit reporting laws permit it, we are permitted to disclose your credit-related information to CRBs for the purposes above. CRBs may include the information we provide to them in their reports in order for them to conduct an assessment of your credit worthiness. If you fail to meet your payment obligations to us in relation to consumer credit or commit a serious credit infringement, we may be entitled to disclose that information to CRBs.

The CRBs to whom we may disclose your information include:

<b>TransUnion</b>	
Website:	<b>www.transunion.ca</b>
Phone:	<b>1-800-663-9980</b>
Address:	<b>3115 Harvester Rd, Burlington, ON L7N 3N8</b>

<b>Equifax Canada Co.</b>	
Website:	<b>https://www.consumer.equifax.ca/personal/</b>
Phone:	<b>1-800-465-7166.</b>
Address:	<b>National Consumer Relations, Box 190, Montreal, Quebec H1S 2Z2</b>

## 9. Your rights in relation to CRBs

You are entitled to opt out of direct marketing pre screenings: CRBs often use credit information to assist credit providers to market their products and services. If you do not want a credit reporting body to use your credit information in this manner, the Privacy Acts give you the right to request you be excluded from being contacted. You should contact the relevant CRB directly if you wish to request this.

## 10. Your ability to access your personal information that we hold (including credit information)

You have specific rights under Canadian law in relation to requesting access to and correction of personal information we hold about you and making a privacy complaint.

You can request access to the personal information we hold about you subject to certain exceptions under the Privacy Acts. In order to access your personal information, please make your request in writing and send it to the Privacy Officer at [privacy.CA@shophumm.com](mailto:privacy.CA@shophumm.com).

We verify the identity of anyone requesting access to personal information, so as to ensure that we do not provide that information to a person or people who do not have the right to access that information.

We ask that your request for information be as specific as possible so that we can accommodate your request. We will usually provide you with access within thirty (30) days of a request but in some circumstances it may take longer.

Please note, that under Canadian law, we are entitled to refuse you access to your information in certain circumstances, including where:

- access would likely reveal personal information about a third party;
- the information is protected by solicitor-client privilege;
- access would reveal confidential commercial information;
- access could reasonably be expected to threaten the life or security of another individual;
- the information was generated in the course of a formal dispute resolution process.

There may be other reasons we may refuse to provide you access to your information. If we refuse you access, we will explain why in writing.

## 11. How you can correct the personal information we have about you (including credit information)

We take every step that is reasonably practicable to ensure that the personal information we collect, use, and disclose is accurate, complete and up-to-date. The Privacy Acts give you the right to request correction of the

personal information we hold. If you believe that the personal information we have is incorrect, then please contact us using the details below:

Phone: **+1 844 944 0283**  
Email: **privacy.CA@shophumm.com**

Please address your correspondence, or ask to speak to, our Privacy Officer.

If we do not agree to your request for correction, we will give you notice of this outlining our reasons and what next steps you can take. You may also request us to associate a statement with that information to the effect that the information is inaccurate, out-of-date, incomplete, irrelevant, or misleading so that it is apparent to users of the information.

## **12. Personal information about other persons**

If you provide us with personal information about any other person, such as a referee, you agree to tell them:

- that you are providing this information to us;
- of our contact details set out in this Privacy Policy
- the reason you are providing their information; and
- the fact that we collect, use, and disclose personal information as set out in this Privacy Policy.

## **13. Cookies**

One way of collecting information is through cookies. Cookies are small text files that websites send to your computer or other internet-connected device to uniquely identify your browser or to store information or settings in your browser. Cookies allow us to recognize you when you return. They also help us provide a customized experience.

In many cases, the information we collect using cookies and other tools is only used in a non-identifiable way, without reference to personal information. For example, we use information we collect about website users to optimize our website and to understand website traffic patterns.

- Third party vendors, including Google, use cookies to serve ads based on your prior visits to their websites.
- Google's use of the DART cookie enables it and its partners to serve ads to you based on your visit to sites and/or other sites on the internet.
- You may opt out of the use of the DART cookie by visiting the advertising opt-out page. (Alternatively, you can opt out of a third-party vendor's use of cookies by visiting the Network Advertising Initiative opt-out page.)

You can use Ads Settings to manage the Google ads you see and opt out of interest-based ads. Even if you opt out of interest-based ads, you may still see ads based on factors such as your general location derived from your IP address, your browser type and recent, previous searches related to your current search.

## **14. AdWords**

We use the Google AdWords remarketing service to advertise on third party websites (including Google) to previous visitors to our site. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits to our website. Any data collected will be used in accordance with this Privacy Policy and Google's privacy policy. You can set preferences for how Google advertises to you using the Google Ad Preferences page.

## **15. Privacy complaints and disputes**

If you wish to make inquiries or complaints or have other concerns about our personal information practices, you may write to us as described below in the Contacting Us section.

Please note, that where your complaint relates to your credit-related information, we may consult with a credit reporting body or other credit provider in order to investigate and resolve your complaint. Depending on the type of complaint, it may also be necessary for us to consult with other third parties.

If you are having difficulties meeting your payment obligations, please contact us directly to discuss payment options.

## **16. Contacting us**

If you wish to find out more information, or raise any specific or general concerns, about us and this Policy and privacy practices, the contact details are as follows:

Phone: **+1 844 944 0283**  
Email: **privacy.CA@shopnumm.com**