



Finhaven Technology Inc.

PRIVACY POLICY

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FINHAVEN TECHNOLOGY INC. PRIVACY POLICY

1. INTRODUCTION

Finhaven Technology Inc. (operating as “Finhaven”) and its corporate affiliates (“Finhaven”, “we”, “us”, “our”) respect and uphold individual rights to privacy and the protection of personal information while balancing such rights with our need to process your personal information to manage our business and deliver our services to you. Based on applicable privacy and data protection principles common to Canada and the provincial jurisdictions to which we are subject, we have developed this privacy policy (the “Policy”) to explain our practices for processing your personal information. This Policy does not apply to our employees’ personal information or any anonymized information.

This Policy describes our practices with respect to how we may collect, use, disclose, retain, dispose of and otherwise process (collectively, “process”) and how you may correct, update and access your personal information that you provide as a user of (a) the website operated at <https://www.finhaven.com>, or other locations from time to time (the “Website”), (b) the services we provide through the Website (the “Services”). This Policy references the general Terms of Use for Finhaven located at <https://www.finhaven.com/termsfuse>, and forms an integral part of it.

All capitalized terms not otherwise defined herein have the meaning provided in Finhaven’s Terms of Use or are brand names for Finhaven products or services.

Our Website may contain links to other websites or Internet resources that are provided solely for your convenience and information. When you click on one of those links, you are contacting another Internet resource. We have no responsibility or liability for, or control over, those other Internet resources or their collection, use and disclosure of your personal information. We encourage you to read the privacy policies of those other Internet resources to learn how they collect and use your personal information.

PLEASE READ THIS PRIVACY POLICY CAREFULLY. By using our Website or Services, or otherwise by choosing to provide us with your personal information, you acknowledge and consent to Finhaven processing your personal information in Canada in accordance with this Policy and as may be further identified when the personal information is collected. If you are located or reside outside of Canada, please be aware that this Policy is intended for and directed to users in Canada, and the privacy laws and principles in Canada may differ and not offer the same level of protection as those in your location or country/region of residence. Through your continued use of our Website or Services, you are transferring your personal information to Canada and you expressly consent to that transfer. We will use this consent as the legal basis for such data transfer, unless otherwise stated in this Policy.

If you do not consent to us processing your personal information in accordance with this Policy, please do not access or continue to use any of the Website or Services or otherwise provide any personal information to us.

2. PERSONAL INFORMATION

For the purposes of this Policy, “**personal information**” means any identifiable information about an individual, including but not limited to an individual’s name, home address, telephone number, social insurance number, gender, income and family status, except any other information otherwise exempted by the applicable laws of Canada.

When you use our Website or Services, we may collect the following personal information from you so that we can serve you:

- Contact information such as name, email address, and whether you are an investor, issuer, regulator, or other kind of visitor.

Collection from Third Parties

We do not knowingly collect your personal information from a third party unless you consent or we are otherwise exempted, required, or permitted by applicable laws to do so. For example, we may collect your personal information from the following third parties:

- Public sources in which your personal information is publicly available.

If we collect your personal information from a third party, we will only process that information for the specific purpose for which it was provided to us in accordance with this Policy and the policy under which that information was collected.

Cookies and Log Files

Our Website uses "cookies" and similar technologies like single-pixel GIFs and web beacons. A "cookie" is a text file that is sent to your computer or device and from your computer each time you use the site. Cookies can track how and when you use the Website and which site you visited immediately before. A cookie does not damage your system and identifies your browser, not you personally.

We use cookies to collect information such as the server your computer is logged onto, the domain name of your internet service provider, your browser type and version (for example, Netscape or Internet Explorer) and your IP address. We may also derive the general geographic area associated with an IP address.

Sometimes, we use cookies in combination with “web beacons” or similar technology to collect information about how our Website is used, such as: your IP address and location data, weblogs, time zone, date, your language preferences, browsers used, web addressees visited, other communication data, searches conducted, pages visited, and any other relevant information about your online experience.

If you are an anonymous visitor, the information in this paragraph does not personally identify you but rather numerically identifies your device, and we share this cookie's information with a third party marketing provider that will use it to deliver marketing about us to you while you visit other sites on the internet.

If you do not wish to receive cookies, you may be able to disable them. Although this may provide you with enhanced anonymity, it may affect the functioning of our Website.

To the extent that our Website contains links to other sites, the owners of those sites are responsible for the privacy practices or content of those other sites. We do not endorse and will not be responsible for the privacy practices on third party websites.

Third Party Advertising

We use third-party advertising companies to strengthen, manage and improve our online and email advertising campaigns. These companies may collect information about your activity on our Website and other websites (such as web pages you visit and your interaction with our advertising and other communications) and/or apps in order to make predictions about your preferences, develop personalized content and deliver advertisements about goods and services of interest to you. We may also partner with ad networks and other companies that serve ads on behalf of us and others on non-affiliated digital properties. Some of those ads may be personalized, meaning that they are intended to be relevant to you based on information these ad networks collect about your visits to our websites and other non-affiliated websites or apps over time. This information may also be used to evaluate the effectiveness of our online advertising campaigns. Cookies set by these third parties may be used by those companies to build a profile of your interests and show you relevant advertisements on other sites. They do not directly store personal information (such as name or government identification numbers) but are based on uniquely identifying your browser and internet device. Accordingly, information collected by such cookies, alone or in combination with other available information, could potentially be linked to you. If you do not allow these cookies, you will experience less targeted advertising.

You may visit <http://www.aboutads.info/choices> or www.youradchoices.ca/choices to learn more about third party advertising and how to opt-out of this form of advertising on your web browser by companies participating in the Digital Advertising Alliance ("DAA") or the Digital Advertising Alliance of Canada ("DAAC") self-regulatory programs. If you wish to opt-out of interest-based advertising in mobile apps on your device by companies that participate in the DAA's AppChoices app, you may download that app onto your device and exercise your choice. AppChoices is available at: <https://youradchoices.com/appchoices>.

Information about Minors

This site is intended solely for users who are not minors (13 years of age or older). We do not knowingly collect personal information about any minor. No such minor, nor any parent or guardian

as it relates to such minor, should submit such minor's personal information to us through the Website, Software or otherwise for any reason and under any circumstances.

3. Purpose for Which Personal Information is Processed

We may process your personal information for the following purposes (the “Purposes”):

- Add you to our list for general communications about Finhaven;
- Conduct research and surveys used to understand market interest in and responses to Finhaven, the Website, and Services; and
- Comply with legal obligations.

We will only process your personal information for the Purposes for which we intend to process such information. Otherwise, we will not process your personal information without your consent.

4. Disclosure of Your Personal Information

We may disclose your personal information for the Purposes as described in this Policy in the following ways:

- To our employees and contractors who need to know the information in order to provide the Services to you;
- To our affiliates, in the event disclosure is necessary to provide you with effective Services;
- To our legal counsel, in the course of seeking advice about an event or circumstance involving you and for which we require advice;
- To our service providers including web hosting providers; and
- To law enforcement, government or regulatory bodies or other lawful authorities.

5. Legal Basis for Processing Your Personal Information

Consent

We will process your personal information only with your knowledge and consent, except where exempted, required or permitted by applicable laws. The form of consent may vary depending on the circumstances and the type of information being requested. Your consent may be express with clear options to say “yes” or “no”, such as by being asked to check a box to indicate your consent, or implied, such as when you provide us with your address through a form or email seeking information and we use those means to respond to your request. Your consent can also be provided by your authorized representative. Taking into account the sensitivity of your personal information,

purposes of collection and your reasonable expectations, we will obtain the form of consent that is appropriate to the personal information being processed. By using our Website or Services, or otherwise by choosing to provide us with your personal information, you acknowledge and consent to the processing of your personal information in accordance with this Policy and as may be further identified when the personal information is collected. When we process your personal information for a new purpose, we will document that new purpose and ask for your consent again.

If you do not consent to the processing of your personal information in accordance with this Policy, please do not access or continue to use any of the Website or Services or otherwise provide any personal information to us.

You may refuse to provide consent or may notify us at any time that you wish to withdraw or change your consent to the processing of your personal information, subject to legal restrictions and reasonable notice by (i) stopping use of the Website, or (ii) opting out of the use of your personal information such as unsubscribing to any newsletter or mailing list subscription that we provide through the Website. However, if you withdraw or change your consent, we may not be able to provide you with the Services through the Website.

Other Legal Bases

Aside from consent, we may also process your personal information under other legal bases, as permitted by the applicable laws.

6. Security of Personal Information

The security of your personal information is important to us. We protect personal information using physical, technological and organizational safeguards. We regularly review our practices to ensure they align with reasonable industry practices appropriate to the level of sensitivity to safeguard personal information against loss or theft, unauthorized access, alteration or disclosure.

However, no method of transmission over the Internet, or method of electronic storage, is completely secure; as such, despite our safeguards and protocols, we cannot fully guarantee the security of your personal information and you should always exercise caution when disclosing personal information over the Internet.

7. Requests for Access to and Correction of Personal Information

Applicable privacy laws allow, to varying degrees, individuals the right to access and/or request the correction of errors or omissions in his or her personal information that is in our custody or under our control. You may request access to and review of your personal information in our possession. However, access may be declined where permitted or required by applicable law.

You may request that we change or delete your personal information in our possession. We reserve the right not to change any personal information if we do not agree that it is inaccurate or outdated but will append any alternative text the individual concerned believes appropriate.

If access cannot be provided, we will notify the individual making the request within 30 days, in writing, of the reasons for the refusal.

8. Retention of Your Personal Information

We generally keep personal information for only as long as it is needed to accomplish the purposes for which it was collected, or as needed for authorized or legitimate purposes. More specifically, we retain personal information as long as necessary for the fulfillment of the identified purposes for its collection or as otherwise necessary to comply with applicable laws or protect our interests. When personal information is no longer necessary or relevant for the identified purposes, or is required to be retained by applicable laws, we will take steps to have it deleted, destroyed, erased, aggregated or made anonymous. We use reasonable industry practices to ensure we have adequate controls, schedules and practices for information and records retention and destruction, which apply to personal information.

9. Updates or Changes to this Policy

This Policy was last approved for use by the CEO/UDP and the CCO on December 4, 2020. The history of updates to this Policy appears in a table at the end of this Policy.

If we make any material changes we will either (a) notify you by email (sent to the email address you provided in our Contact Form), or (b) provide a notice on the Website or otherwise through the Services before the change becomes effective. Any change to this Policy will apply to existing information, as well as information collected onwards from the date that this Policy is posted or on the date as specified in the notification. We encourage you to periodically review this page for the latest information on our privacy practices to ensure you are aware of any changes.

10. Contact Information for Privacy Officer

You can direct any questions or concerns regarding our compliance with this Policy and our processing of your personal information to our Privacy Officer by emailing privacy@finhaven.com.

End of Policy