

# Privacy Policy

EMS MONEY INC.

## Summary

<b>1. COLLECTION OF INFORMATION .....</b>	<b>2</b>
<b>2. USE OF INFORMATION .....</b>	<b>2</b>
<b>3. DISCLOSURE OF INFORMATION .....</b>	<b>3</b>
<b>4. INFORMATION SECURITY .....</b>	<b>3</b>
<b>5. DATA RETENTION.....</b>	<b>4</b>
<b>6. YOUR RIGHTS.....</b>	<b>4</b>
<b>7. USE OF ARTIFICIAL INTELLIGENCE.....</b>	<b>5</b>
<b>8. INTERNATIONAL DATA TRANSFERS.....</b>	<b>5</b>
<b>9. CHANGES TO THE PRIVACY POLICY .....</b>	<b>5</b>
<b>10. CONTACT .....</b>	<b>6</b>

## PRIVACY POLICY

EMS MONEY INC is committed to protecting the privacy and personal data of our customers, in compliance with applicable laws and regulations, including Canada's Personal Information Protection and Electronic Documents Act (PIPEDA) and the guidelines of the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC). This Privacy Policy describes how we collect, use, disclose and protect your personal information.

### 1. COLLECTION OF INFORMATION

We collect personal information directly from you when you register for our services, conduct transactions, or interact with us in other ways. The information we collect may include:

- Full name
- Date of birth
- Residential address
- Contact information (phone, email)
- Identification information (passport, driver's license)
- Financial and banking information
- Information about transactions and business activities
- Biometric information (where applicable)

### 2. USE OF INFORMATION

We use your personal information for the following purposes:

- Provide and manage our payment services
- Verify your identity and conduct due diligence procedures

- Comply with legal and regulatory obligations, including anti-money laundering and counter-terrorist financing requirements
- Detect and prevent fraud and other illegal activities
- Improve our services and communicate with you about updates or changes
- Conduct risk analysis and implement appropriate security measures
- Facilitate secure and reliable cross-border data transfers

### 3. DISCLOSURE OF INFORMATION

We may share your personal information in the following circumstances:

- With regulatory authorities, such as FINTRAC, when required by law
- With business partners and service providers who assist us in providing our services
- In response to valid legal processes or government requests
- With other financial institutions for fraud prevention and regulatory compliance purposes, as permitted by law

We do not sell or rent your personal information to third parties for marketing purposes.

### 4. INFORMATION SECURITY

We implement technical, administrative, and physical security measures to protect your personal information against unauthorized access, disclosure, alteration, and destruction. These measures include:

- Encryption of data in transit and at rest
- Strict access controls
- Continuous monitoring of our systems

- Regular employee training on security and privacy practices
- Implementation of a Security Information and Event Management (SIEM) system
- Regular cybersecurity risk assessments

## 5. DATA RETENTION

We retain your personal information for as long as necessary to fulfill the purposes for which it was collected, including legal and regulatory obligations. For anti-money laundering and counter-terrorist financing purposes, we maintain records for a minimum period of five years after the end of the business relationship or after the date of the transaction, as required by FINTRAC.

We implement a regular review process to ensure that personal information is not retained longer than necessary, including proactive disposal of information older than 10 years, except where required by law.

## 6. YOUR RIGHTS

You have the right to:

- Access your personal information that we hold
- Request corrections to inaccurate or incomplete information
- Question the use of your personal information
- Be informed about how your information is used and disclosed
- Request the portability of your data, as provided for in Quebec's Law 25
- Withdraw your consent for the processing of your personal information, where applicable

To exercise these rights or ask questions about our Privacy Policy, contact our Privacy Officer.

## 7. USE OF ARTIFICIAL INTELLIGENCE

If we use artificial intelligence (AI) systems to process your personal information or make automated decisions that may directly affect you, we will take the following measures:

- Inform you about the use of AI at the time of data collection
- Ensure that automated decisions are fair, transparent, and explainable
- Maintain human oversight over AI systems
- Conduct regular privacy impact assessments for AI systems

## 8. INTERNATIONAL DATA TRANSFERS

To facilitate secure cross-border data transfers, we are implementing certifications from the Global Cross-Border Privacy Rules (CBPR) Forum. This will allow us to demonstrate compliance with international privacy and data protection standards.

## 9. CHANGES TO THE PRIVACY POLICY

We may update this Privacy Policy periodically to reflect changes in our practices or legal obligations. We will post the updated version on our website and, if there are significant changes, we will notify you directly.

## 10. CONTACT

For privacy-related questions or to make a complaint, contact our Privacy Officer:

Email: [privacy@emsmoney.io](mailto:privacy@emsmoney.io)

Phone: +1 (672) 202-7900

Address: 777 Hornby Street, V6Z 1S4, Vancouver, CA

If you are not satisfied with our response, you have the right to contact the Privacy Commissioner of Canada or the relevant data protection authority in your jurisdiction.

By using our services, you agree to the terms of this Privacy Policy. We recommend that you review this policy regularly to be aware of any updates.