

Privacy Policy

FinXtra — 9511-3965 Québec Inc.

Effective Date: March 13, 2026

Last Revised: March 13, 2026

Everyone at FinXtra values your trust, and we are committed to protecting your personal data. This Privacy Policy outlines how FinXtra ("9511-3965 Québec Inc., trading as FinXtra", "we", "our", or "us") collects, uses, discloses, and safeguards your personal information when you use our services or visit our website (www.finxtra.ca), including our digital platforms, payment interfaces, and customer portals (collectively, the "Services").

FinXtra operates across Canada, the United States, Mexico, and the United Kingdom. We are committed to complying with all applicable data protection laws in each jurisdiction where we operate, including: PIPEDA and Quebec Law 25 (Canada), UK GDPR and PECR (United Kingdom), CCPA/CPRA (California, USA), and LFPDPPP (Mexico).

1. Scope

This policy applies to all individuals and businesses who use or interact with FinXtra, including website visitors, platform users, financial partners, and business clients. It does not extend to third-party websites or applications you may access via links on our platform.

2. Information We Collect

a) Information You Provide to Us

- Personal & Contact Data: Name, email address, phone number, mailing address
- Business Information: Company name, registration details, beneficial ownership information
- Verification Data: Government-issued ID, proof of address, tax information (e.g., SIN, TIN, NEQ)
- Transaction Data: Payment details, recipient information, amounts, currency preferences
- Communication Data: Emails, messages, feedback, and form submissions

b) Information Collected Automatically

- IP address, browser type, access time, and referring pages
- Device identifiers, operating system, screen size, language, and location (if enabled)
- Clicks, pages visited, and time spent on our platform
- Cookies and similar tracking technologies (see Section 6)

c) Information from Third Parties

- Identity and compliance screening providers (KYC/AML)
- Business partners, payment networks, and banking institutions
- Public records and sanctions list databases

3. How We Use Your Information

We use your personal information to:

- Provide, maintain, and improve our Services
- Verify your identity and ensure regulatory compliance (anti-fraud, AML, sanctions screening)
- Facilitate payments, FX conversions, and account management

- Provide customer support and respond to inquiries
- Send service-related updates and, where you have consented, promotional communications
- Conduct analytics, reporting, and risk management
- Comply with legal obligations and regulatory audits

4. Legal Basis for Processing

We process your personal data on the following legal bases, as applicable under UK GDPR and other applicable laws:

- Consent — where you have given clear, informed consent
- Contractual necessity — to deliver the services you have requested
- Legal obligation — to comply with applicable financial regulations and laws
- Legitimate interests — for fraud prevention, security, and service improvement, where these interests are not overridden by your rights

5. Quebec Law 25 — Special Notice for Quebec Residents

FinXtra is headquartered in Montreal, Quebec, and fully complies with Quebec's Act Respecting the Protection of Personal Information in the Private Sector (Law 25), which came into full force in September 2023. In accordance with Law 25:

We obtain your consent before collecting, using, or disclosing your personal information, except where the law provides an exception. You have the right to access, correct, and request deletion of your personal information. You may withdraw your consent at any time, subject to legal and contractual restrictions. We have appointed a Privacy Officer responsible for the protection of personal information. You may file a complaint with the Commission d'accès à l'information (CAI) if you believe your privacy rights have been violated. Privacy Impact Assessments (PIAs) are conducted for any new projects involving personal information.

6. UK GDPR & PECR — Special Notice for UK Residents

For individuals located in the United Kingdom, FinXtra complies with the UK General Data Protection Regulation (UK GDPR) and the Privacy and Electronic Communications Regulations (PECR).

Under UK GDPR, you have the following rights: the right to access your personal data; the right to rectification; the right to erasure ("right to be forgotten"); the right to restrict processing; the right to data portability; the right to object to processing; and rights related to automated decision-making and profiling.

We will not set non-essential cookies or tracking technologies for UK visitors without your prior, explicit consent. You may withdraw consent at any time through our cookie preference centre.

FinXtra may be required to register with the Information Commissioner's Office (ICO) as a data controller. For privacy concerns relating to UK data processing, you may contact the ICO at www.ico.org.uk.

7. Cookies and Tracking Technologies

FinXtra uses cookies and similar technologies to improve your experience, analyze platform usage, and support marketing efforts. Cookies are categorized as follows:

- Essential Cookies — required for the platform to function; no consent required
- Analytics Cookies — help us understand how visitors use our site (e.g., Google Analytics); consent required
- Marketing Cookies — used for targeted advertising and retargeting (e.g., Meta Pixel, LinkedIn Insight); consent required
- Preference Cookies — remember your settings and choices; consent may be required

You can manage or withdraw your cookie consent at any time through our cookie preference centre, accessible via the banner displayed on your first visit to www.finxtra.ca. For UK and Quebec visitors, non-essential cookies will not be activated without your explicit consent.

8. How We Share Your Information

We only share your personal information when necessary and in the following circumstances:

- Service Providers: For payment processing, identity verification, customer support (e.g., Ebury, banking partners)
- Regulatory Bodies: As required to meet legal, compliance, and reporting obligations
- Business Partners: When facilitating services on your behalf (e.g., factoring, liquidity providers)
- Business Transfers: In the event of a merger, acquisition, or sale of assets
- Fraud Prevention: With authorities or fraud prevention agencies where misuse is suspected
- With Your Consent: Where you have authorized a third-party integration or referral

9. International Data Transfers

As FinXtra operates across Canada, the United States, Mexico, and the United Kingdom, your personal data may be transferred across borders. Where data is transferred outside the UK or Canada, we ensure that appropriate safeguards are in place, such as Standard Contractual Clauses (SCCs) or equivalent mechanisms, to protect your data in accordance with applicable law.

10. Your Rights and Choices

Depending on your jurisdiction, you may have the right to:

- Access, update, or correct your personal data
- Request deletion or restriction of your data
- Withdraw consent to processing at any time
- Object to certain uses of your personal data
- Request a portable copy of your data
- Lodge a complaint with your local data protection authority

To exercise any of these rights, please contact us at conformite@FinXtra.ca. We may request verification of your identity before processing your request. We will respond within 30 days (or within the timeframe required by applicable law).

11. Data Retention

We retain personal data for as long as necessary to deliver our Services, meet legal obligations, and support compliance requirements. Retention periods are determined by the nature of the data and applicable regulatory requirements. When data is no longer required, it is securely deleted or anonymized.

12. Data Security

FinXtra implements appropriate technical and organizational measures to protect your personal information against unauthorized access, loss, alteration, or disclosure. These measures include encryption, access controls, and regular security assessments. In the event of a data breach affecting your rights and freedoms, we will notify you and the relevant supervisory authority as required by law.

13. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or applicable law. We will notify you of material changes by posting the updated policy on our website with a revised effective date. Where required by law, we will seek your consent before implementing material changes.

14. Contact Us & Privacy Officer

If you have any questions, concerns, or requests regarding this Privacy Policy or how we handle your personal data, please contact us:

FinXtra — Privacy Officer
9310 Boul. Saint-Laurent
Montreal, QC, H2N 1N4
Canada

Email: info@FinXtra.ca
Website: www.finxtra.ca

For UK-specific privacy matters, you also have the right to contact the Information Commissioner's Office (ICO) at www.ico.org.uk.

For Quebec-specific privacy matters, you may contact the Commission d'accès à l'information (CAI) at www.cai.gouv.qc.ca.