

FFUN PRIVACY POLICY

Last Revised: August 01, 2023

FFUN (“**Company**,” “**we**,” “**us**”, and “**our**”) respects your privacy and is committed to protecting your privacy through our compliance with this Privacy Policy (the “**Policy**”).

This Policy applies with respect to the processing of your personal information as a user on the FFUN platform (the “**Platform**”) accessible at: www.ffun.com. The Platform allows users to browse and search for vehicles, schedule and conduct test drives, apply for financing, and complete a purchase transaction, along with related services (the “**Services**”). This Policy describes the types of personal information we collect from you or that you may provide when you visit our Platform and our practices for collecting, using, maintaining, protecting, and disclosing that personal information.

To ensure we provide you with the best possible experience, we will store, use, and share information about you only in accordance with this Policy. Please read this Policy carefully to understand our practices regarding your personal information and how we will treat it. If you do not agree with our policies and practices, then please do not use our Platform or Services. By using our Platform or Services, you agree to the terms of this Policy.

This Policy may change from time to time (see Section 9 below). Your continued use of our Platform or Services after we make changes is deemed acceptance of those changes, so please check this Policy periodically for updates.

1. What We Collect and How We Collect It

(a) What is Personal Information

“Personal Information” is any information about you as an identifiable individual, and that can be used to individually identify you from a larger group of individuals, such as data including, but not limited to, your:

- first and last name;
- email address;
- telephone number;
- date of birth and age;
- mailing address;
- comments or messages provided in free text boxes;
- user ID and credential (Platform only);
- identifying numbers (such as your Social Insurance Number);
- details relating to financial transactions; and
- payment card information (Platform only).

The type and extent of Personal Information that we may need to collect from you depends upon the Services you wish to access or use. We collect only the Personal Information needed to administer the Platform and Services.

We collect information about you when you provide it to us, or we collect it automatically through the Platform and Services that you choose to use. Wherever possible, we collect Personal Information directly

from you, however, we may collect Personal Information from third parties (with your consent/approval) in order to process financial transactions that you may request or initiate.

(b) Information You Provide to Us

Generally, you may provide us Personal Information when you:

- register yourself on the Platform;
- request information or sign up for marketing communications, such as through a Contact Us page, Get Notified forms or equivalent;
- use the Live Chat functionality on the Platform;
- arrange for a vehicle test drive;
- request a pre-qualification for purchase or other financing related requests; or
- complete a vehicle purchase through the Platform, including payment, trade-in (if applicable) or delivery information.

Additionally, you may provide us with non-Personal Information when you complete vehicle finder information such as family size, daily travelling distance and other information to allow us to recommend cars that suit your lifestyle or otherwise customize your user experience.

(c) Automated Information Collection

In addition to the information that you provide to us, we may also collect information about you during your visit to our Platform.

We may collect this information using automated tools that are detailed below. These tools may collect information about your behavior and your computer system, such as your internet address (IP Address), the pages you have viewed, and the actions you have taken while using the Platform. These tools may also capture information regarding the type of browser and operating system you use.

- (i) Cookies. Some of the tools we use to automatically collect information about you may include cookies. A “cookie” is a small data file transmitted from a website to your device’s hard drive. Cookies are usually defined in one of two ways, and we may use both of them: (1) session cookies, which do not stay on your device after you close your browser and (2) persistent cookies, which remain on your device until you delete them or they expire. We may use the following categories of cookies on our Platform:
- a. *Strictly Necessary Cookies*. These cookies are essential in order to enable you to move around the Platform and use its features. Without these cookies, services you have requested, such as maintaining a record of your favourite vehicle listings, cannot be provided.
 - b. *Performance Cookies*. These cookies collect anonymous information on how people use our Platform to help us understand how you arrive at our site, browse or use our Platform and highlight areas where we can improve, such as navigation. The data stored by these cookies never shows personal details from which your individual identity can be established. We may use third-party service providers to monitor and analyze the use of our Platform. For more information on our service providers and their applicable privacy practices, please contact us at the contact information set out below.

- c. *Functionality Cookies.* These cookies remember choices you make such as your search parameters. This information can then be used to provide you with an experience more appropriate to your selections and to make your visits to our Platform more tailored to your preferences. The information in these cookies may be anonymized. These cookies cannot track your browsing activity on other websites.
- d. *Targeting Cookies or Advertising Cookies.* These cookies collect information about your browsing habits in order to make advertising more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of an advertising campaign.

Of course, if you do not wish to have cookies on your devices, you may turn them off at any time by modifying your internet browser's or device's settings. If you disable cookies on your device you will still be able to access the Platform, however, you may be unable to interact with some portions of the Platform, to make full use of the Platform's features, or you may lose access to some functionality.

- (iv) Web Beacons. A Web Beacon is an electronic image. Web Beacons can track certain things from your computer and can report activity back to a web server allowing us to understand some of your behavior. If you choose to receive emails from us, we may use Web Beacons to track your reaction to our emails. We may also use them to track if you click on the links and at what time and date you do so. Some of our third-party marketing partners may use Web Beacons to track your interaction with online advertising banners on our Platform.
 - (v) Embedded Web Links. Links provided in our emails and, in some cases, on third-party websites may include tracking technology embedded in the link. Some of these links will enable us to identify that you have personally clicked on the link and this may be attached to the Personal Information that we hold about you. This data is used to improve our service to you and to help us understand the performance of our marketing campaigns.
- (d) Third-Party Service Providers

We work also with a number of service providers that support our marketing and business operations, such as providing data storage services. These service providers may use various data collection methods to add functionality or improve the performance of the Platform. Such third parties are under contract to use any Personal Information in accordance with Company instructions in support any services to the Company, including this Policy. These service providers may be located outside of Canada, and accordingly, may store or process Personal Information outside of Canada (including in the United States of America). When Personal Information is stored or processed outside of Canada, it may be subject to the laws of and be accessible by legal authorities in such other jurisdictions.

2. Your Choices and Selecting Your Privacy Preferences

- (a) We respect an individual's right of access to his/her/their Personal Information and will inform you of the existence, use and disclosure of your Personal Information upon request. We may refuse access to Personal Information where it is subject to solicitor-client privilege, is part of or relates to an investigation and disclosure could impair the enforcement of law or the conduct of an investigation, or where disclosure threatens the safety of individuals.

- (b) Whenever possible, you can exercise choices as to how the Company uses your Personal Information.
- (c) We value your privacy. As such, you reserve the right to request we delete any of your personal information collected throughout the buying or inquiry process. Any deletion requests must be submitted by email to yourfriends@ffun.com. Once received, requests will be addressed in a reasonable timeframe, if for some reason unforeseen circumstances occur and more time is permitted, we will notify you of the delay. For any deletion request, we will require verification of your identity. This includes, but is not limited to, personal details such as your name, email address, home address, and date of birth. Once confirmed, a verification email will be sent that you must respond to in order for us to proceed and finalize the deletion request.
- (d) We will not intentionally send you email marketing communications unless you consent to receive such marketing information, or you are otherwise a registered Platform user and receive such marketing materials as required under another contract.
- (e) You may opt out of applicable communications at any time by selecting the “unsubscribe” link at the bottom of each email. Please note that by opting out or unsubscribing you may affect other services or communications you have requested we provide to you in which email communication is a requirement of the service provided.
- (f) More specifically, the Company has structured its practices to comply with the consent and unsubscribe requirements under Canada’s Anti-Spam Legislation (CASL). Where consent is required by CASL, we will ensure that you have expressly opted-in or that we have your implied consent (as defined under CASL) to receive Company communications before they are sent to you. Further, we ensure that all communications include a clear means to opt-out of receiving any further Company business and/or marketing messages as required under CASL.

3. Accuracy and Access to Your Personal Information

- (a) We strive to maintain and process your information accurately. We have processes in place to maintain all of our information in accordance with relevant data governance frameworks and legal requirements. We employ technologies designed to help us maintain information accuracy on input and processing. We recommend that you keep your password safe, that you change it periodically, and that you do not disclose it to any other person or allow any other person to use it.
- (b) We will take all reasonable steps to respond to your concerns about the accuracy and completeness of Personal Information and amend it where appropriate. In certain circumstances you may also require an annotation to be attached to your Personal Information reflecting any correction requested but not made, or that a correction be notified to certain individuals.
- (c) To view and change the Personal Information that you have provided to us, you can log in to your account and follow the instructions on that webpage or contact us directly for assistance.

4. How We Use Your Information

- (a) We will not use or disclose Personal Information for a purpose other than that for which it was collected, except with your consent or as required by law. The information we gather or that you provide is collected to provide you information and the services you request, in addition to various other purposes, including, but not limited to:

- (i) assisting you with personalized experiences, facilitation of Platform usage, and enforcement of the Terms of Use;
 - (ii) assisting you in utilizing the Services, including but not limited to, the shopping for and purchasing vehicles which may include obtaining credit bureau reports, running credit pre-qualification checks, completing full credit approvals, suggesting vehicles based on your lifestyle, scheduling test drives and vehicles deliveries, and customizing warranties and insurance products;
 - (iii) preventing malicious activity and providing you with a secure experience;
 - (iv) providing service and support;
 - (v) providing marketing communications that are effective and optimized for you;
 - (vi) preventing unwanted messages or content;
 - (vii) measuring the performance of our marketing programs; and
 - (viii) contacting you about services and offers that are relevant to you.
- (b) We will retain your information for as long as you use the Platform or Service, as well as for any legal obligations, to resolve disputes or as otherwise required under law.

5. How We Share Your Information

- (a) We do not sell your information to any third party. We may disclose your Personal Information to our trusted third-party business partners in accordance with this Policy. We work with a number of partners that help us process your requests, deliver customer service and support, or send email marketing communications. One such third party is CreditMaxx Financing Ltd, which provides vehicle financing where requested by you in relation to the Services available through the Platform. These third-party partners are under contract to keep your Personal Information secure and not to use it for any reason other than to fulfill the service we have requested from them. Furthermore, we may share aggregated data with third parties for analytics and process improvement purposes. Aggregated data does not contain Personal Information.
- (b) Except as described in this Policy, we will not share your information with third parties without your notice and consent, unless it is under one of the following circumstances:
- (i) responding to valid and authorized requests from law enforcement;
 - (ii) complying with any law, regulation, subpoena, or court order;
 - (iii) investigating and helping prevent security threats, fraud, or other malicious activity;
 - (iv) enforcing or protecting the rights and properties of Company or its subsidiaries; or
 - (v) protecting the rights or personal safety of the Company's employees.

- (c) There are circumstances where the Company may decide to buy, sell, or reorganize its business. Under these circumstances, it may be necessary to share or receive Personal Information with prospective or actual partners or affiliates. In such circumstances, the Company will ensure your information is shared in accordance with this Policy.

6. Safeguarding the Information We Collect

We use commercially reasonable technical, administrative, and physical safeguards, appropriate to the sensitivity of the relevant Personal Information, to protect your Personal Information against accidental loss, as well as unauthorized access, use, alteration, and disclosure. However, we can never promise one hundred percent (100%) security. You have a responsibility, as well, to safeguard your information through the proper use and security of any online credentials and to comply with posted security policies. If you believe your Personal Information has been compromised, please notify us immediately.

For greater certainty, the protection of Personal Information is of paramount concern to the Company, and the Company is prepared to take appropriate and timely steps in the event of any incidents involving personal information in accordance with applicable privacy laws.

7. Third-Party Websites or Applications

This Policy does not apply to websites, applications or other domains that are maintained or operated by third parties. Our Platform may link to third-party websites, applications and services. These links are not endorsements of these third parties, and this Policy does not extend to them. Accordingly, we encourage you to read any posted third-party privacy policy or terms of use before using the service or site and providing any information.

8. For Users Outside of Canada

Our Platform and Services are designed for use by individuals in Canada only. We do not warrant or represent this Policy or the Company's use of your Personal Information as it complies with the laws of any other jurisdiction. Furthermore, to provide you with the Services, we may store, process, and transmit information in Canada and other locations around the world, including countries that may not have the same privacy and security laws as yours. Regardless of the country in which such information is stored, we will process your Personal Information in accordance with this Policy.

9. Changes to this Policy

If we make any changes to this Policy, a revised Policy will be posted on this webpage and the date of the change will be reported in the "Last Revised" block above. You can get to this page from any of our webpages by clicking on the "Privacy Policy" link.

10. How to Contact Us

We value your opinions and welcome your feedback. To contact us about this Policy or your Personal Information, please contact us at yourfriends@ffun.com