



Privacy Policy

1. Our Commitment

Introduction

At Moka, we're committed to protecting your privacy and maintaining strong practices in the handling of personal information in our care.

Moka Financial Technologies Inc. and its subsidiaries and affiliates ("Moka") is a subsidiary of Mogo Inc. and its subsidiaries and affiliates (collectively, the "Mogo Group of Companies"). Moka is referred to in this Privacy Policy as "Moka", "we", "us" or "our", and has developed this Privacy Policy (this "Policy") in accordance with applicable privacy legislation. The Mogo group of companies include, without limitation Mogo, Moka, Mogo Finance Technology Inc. ("Mogo Finance"), MogoTrade Inc. ("MogoTrade") and Carta Solutions Holding Corp. ("Carta") and its subsidiaries and affiliates. This policy explains:

1. What information we collect and why;
2. With whom we share this information; and
3. How we protect it.

Moka has a designated Privacy Officer. Our Privacy Officer is Alice Davidson, Chief Legal Officer: privacy@mogo.ca

The Privacy Officer has the authority to delegate privacy related matters to other qualified individuals within the Mogo Group of Companies.

2. What is Personal Information?

Definition of Personal Information

Personal Information is information about an identifiable individual. In this Policy, when we say "Information" we are referring to information that is about you, that applicable law classifies as personal.

This Policy applies to the Personal Information of Moka's members and other individuals we deal with. This Policy does not apply to Personal Information of

our employees or job applicants, or to information that is not qualified as personal, as defined above.

This Policy does not apply to information that is anonymous, aggregated, or is no longer identifiable to a specific person.

3. Privacy 101

Why? Let's start with *why* we collect your Information.

- We collect Information for the purposes of managing and administering our business. This includes enabling us to verify and approve you for our awesome products. We may collect Information directly from you or from third parties, with your consent, or as permitted or required by law. This collection is necessary in order to perform the contract entered into when you use our product(s) and service(s) in our App.
 - We inform you when collecting your Information whether certain Information is mandatory or optional. Mandatory Information is necessary for the operation of our product(s) and service(s). Regarding optional Information, you are free to provide it or not. We also tell you the possible consequences of a failure to provide mandatory Information.
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What? Information we collect includes, but is not limited to:

- Name, address, email address, mobile phone number and other contact particulars;
- Bank account information, including bank account, transit and institution numbers;
- Credit history and financial and identity information from consumer and credit reporting agencies, or financial institutions or businesses that you currently have, or have had, financial dealings with;
- Income information, including the name and contact information of your employer or other sources of income;
- Information you provide to us in connection with your use of the MogoTrade app and otherwise obtaining services from MogoTrade;
- Name and contact information of personal references, and in the case of MogoTrade and Moka, a Trusted Contact person, should you choose to provide one;
- Information related to verifying your identity in accordance with our regulatory requirements and in order to prevent fraud; in certain situations, this includes the

use of facial recognition technology in the form of a “selfie” photograph and collecting images of valid and current government-issued photo identification; this information is held by our provider for a limited period of time, however, Mogo retains this information for a period of time commensurate with our anti-money laundering and anti-terrorist regulatory requirements;

- Banking information collected from your physical or online bank statements;
 - Information relating to ongoing interactions with Moka, including inquiries or complaints, and similar information;
 - Social Insurance Number, date of birth, and other personal identifiers (if you choose to provide them to us). If you give us your Social Insurance Number, we may use it to identify you with consumer reporting agencies and other parties, and we may keep it in our records with your other information, even after your account is closed;
 - Contact and credit information from other providers of financial products and services where you have agreed to the sharing of your Information with entities like Moka;
 - Information we collect automatically when you visit our website (see “Cookies and Similar Technologies” below);
 - Information we collect from public sources and third parties in order to locate you where a debt is owed to us and we are unable to contact you using the information we have on file;
 - Any Information that you choose to communicate to us about you via support channels; and
 - Other Information collected with your consent or as permitted or required by law.
 - Information is retained only for as long as specified within our Record Retention and Destruction Schedule, or as otherwise provided by way of regulations or contractual obligations.
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How?

We’re transparent about how we collect, use, disclose, and safeguard Information in connection with our business in Canada and in the European Union (“EU”). You can access our Privacy Policy for the European Union [here](#).

We may use your Information:

- to open, maintain, service, process, analyze, audit, and collect on an account;
- to communicate with you in respect of your Account or other Moka product(s) or service(s);
- to enforce the terms of the products or services you have obtained from us;
- to verify your identity, as well as current and ongoing creditworthiness;
- to verify the information you provided to us in connection with an application for an Account or other Moka product(s) or service(s);
- to protect you and us from theft, fraud, and unauthorized access to your account;
- to assess your ongoing needs for products or services;

- to inform you of special promotions or financial products based on your unique interests (see “How We Use and Share Information for Marketing Purposes” below);
- to enter you in and administer promotional contests that we may offer from time to time, and if you win, to identify you for promotion and advertising purposes; and
- for other purposes with your consent or as permitted or required by law.

Note: We may also exchange personal information with our affiliates as necessary for the purposes described above. This includes, without limitation, sharing information across the Mogo Group of Companies, as applicable, including with Mogo Finance, MogoTrade, Mogo and/or Carta.

When?

The following are examples of when we may use your Information:

- We may exchange Information on an ongoing basis with consumer and credit reporting agencies so they can verify your Information, ensure the completeness of the Information they and we have on file about you, and cooperate with local, provincial and national authorities in order to protect you, and us, from fraudulent transactions.
 - We may disclose Information to our affiliates for internal audit, management, billing or administrative purposes including defending and bringing legal actions.
 - We may disclose Information to companies with whom we have agreements for the purposes of offering and administering a product or service offered by them and/or us. If you use a Moka product or service to finance the purchase of goods from a supplier, whether directly or through a third-party provider, we may disclose Information to the supplier and/or third-party provider as necessary to facilitate that transaction.
 - Moka may use and disclose Information in connection with the proposed or actual financing, securitization, insuring, sale, assignment, transfer or other disposals of all or part of Moka or our business or assets, including your account, any debt or interest due to us, and any of our rights and obligations, for the purposes of evaluating and/or performing the proposed transaction. Assignees or successors of Moka or our business or assets may use and disclose your Information for similar purposes as those described in this Policy.
 - We may disclose your Information as necessary to meet legal, regulatory, industry self-regulatory, insurance, audit, reporting, and security requirements, and otherwise with your consent or as permitted or required by applicable law (including foreign law applicable to our service providers).
 - We disclose information only to government agencies that demonstrate legitimate authority to obtain it.
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4. How We Use and Share Information for Marketing Purposes

Marketing purposes

With your consent, we may use your Information in order to identify your preferences, determine your eligibility for special offers and discounts, and contact you in regard to such offers and discounts, or provide other information about our products, services, promotions and events.

We may share your Information, including contact information and credit and financial information, with our affiliates and/or partners for the purposes of developing and promoting new or joint products, improving existing products and services, and contacting you to offer products and services that may be of interest to you. This may include sharing information among the Mogo Group of Companies, including Mogo Finance, MogoTrade, Mogo and/or Carta, on customer data and engagement platforms where customers have opted-in for marketing messages.

Opt-out

If you no longer want us to use or share your Information for marketing purposes, as described above, please contact us by email: support@moka.ai

To opt-out of our email communications, you may click the unsubscribe link at the bottom of the email message. Please note that if you opt-out of marketing communications, we may still send you account-based information relating to your Account or related Moka product(s) or service(s).

5. How We Protect Your Information

Information in Canada

We use physical security measures that are technological and administrative to protect the Information we collect from you. We take all useful precautions to preserve the security, integrity and confidentiality of your Information and in particular, to prevent them from being distorted, damaged or accessed by unauthorized third parties. We ensure our employees and partners handle your Information with care at all times and we require them to maintain their obligations of confidentiality even after the end of their contract with us.

Information across borders

We may transfer Information to outside agents or service providers (including our affiliates acting in this capacity) that perform services on our behalf, for example, mailing, call center, billing, collections, skip-tracing, marketing, analytics, information technology and/or data hosting or processing services or similar services, or otherwise to collect, use, disclose, store or process Information on our behalf for the purposes described in this Policy. Some of these service providers may be located outside of Canada, including in the United States and/or the EU, and as a result,

your Information may be processed and stored on servers outside of Canada for the purposes described in this Policy. Contractual clauses and other measures we may take to protect your Information while processed, stored or handled by these service providers are subject to applicable Canadian and foreign legal requirements, including lawful requirements to disclose personal information to government and national security authorities in certain circumstances.

In all cases, we require outside agents, service providers, affiliates and partners to protect your Information at the same high level that we have committed to.

6. Cookies and Similar Technologies

Cookies and similar technologies

When you visit the Moka website, we may collect and use your internet protocol address to help diagnose problems with our server and to administer the website, to identify users and their activities on the Moka website, and to gather broad demographic information. We may also collect web page choices, browser type, operating system, and time you spend on the site, to help us improve your experience.

We use "cookies", a technology that installs a small amount of information on a website user's computer, to permit our website to recognize future visits using that computer and to avoid having to register your contact information at each visit. Cookies enhance the convenience and use of our website. For example, the information provided through cookies is used to recognize you as a previous user of our website, to track your activity on our website, to respond to your needs, and to otherwise facilitate your experience on our website. You may choose to decline cookies if your browser permits, but doing so may affect your use of our website and your ability to access certain features of our website or engage in transactions through our website.

Moka also uses web cookies and pixel tags to track user behaviour on our websites and to compile reports regarding user demographics, website traffic patterns, and website purchases. We may then provide these reports to advertisers and others.

Within our applications, we may also use analytic tools and automated tracking technology or methods. We use these tools to analyze and enhance the user experience. Moka may use third-party advertising networks to display advertising on our websites or other websites. These advertising networks use cookies or similar technologies to track your navigation habits on our websites and third-party websites in order to serve you advertising that is customized to your inferred interests and preferences. For example, a cookie may be placed on your computer when you visit a Moka website, which is recognized and used by third-party advertising networks to serve you with a Moka ad when you visit other websites within their advertising network. As described above, you may be able to set your browser to decline cookies. If you decline cookies you may still receive online advertising; however, it may be less personalized. Some advertising networks participate in industry programs that include web pages to visit to opt-out. For example: <http://youradchoices.ca/choices>.

7. Third-Party Websites

Other websites We may provide links to other websites that are not operated or controlled by Moka. These websites are not governed by this Policy. We recommend reviewing the privacy statement or privacy policy associated with any linked website prior to visiting the site or providing any Information.

8. Your Consent

Consent Moka collects, uses and discloses your Information with your consent, or as permitted or required by law. Generally, by providing us with your Information, we will assume that you consent to our collection, use and disclosure of such Information for the purposes identified or described in this Policy, if applicable, or otherwise at the time of collection.

We may be required or permitted under statute or regulation to collect, use or disclose Information without your consent, for example, to comply with a court order, to comply with local or federal regulations or a legally permitted inquiry by a government agency, or to collect a debt owed to us.

You may withdraw your consent to our collection, use and disclosure of your Information at any time, subject to contractual and legal restrictions and reasonable notice. We will let you know the consequences of refusing or withdrawing consent. Note that if you withdraw your consent to certain uses of your Information, we may no longer be able to provide certain of our products or services.

If you choose to close your Account, we will delete your Information as soon as authorized under applicable financial information legislation.

Risks

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. You are responsible for the security of any device you use to access your Account. Your Account will be protected with appropriate security measures, which may include passwords, tokens, biometric information, and other measures (“Access Controls”). 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.

9. Access, Correction and Contacting Us

Access and correction

As part of delivering an optimal service experience, the accuracy of your Information is important to us. If you find any errors in your Information, please notify us as soon as possible and we will correct them.

You can access the personal Information we have collected by contacting us at support@moka.ai

If you have any questions about how we collect or protect your personal information, please contact our Privacy Officer at privacy@mogo.ca

Your right to access or correct your Information is subject to applicable legal restrictions. We may take reasonable steps to verify your identity before granting access or making corrections.

10. Policy Update

This Policy may be revised and updated as necessary. We encourage you to review it from time to time.

If we intend to use or disclose personal Information for purposes materially different than those described in this Policy, we will make reasonable efforts to notify affected individuals, if necessary, including by posting the revised Policy on our website at www.moka.ai. We encourage you to visit this website frequently to obtain the latest version of this Policy. Your continued provision of personal Information or use of our services following any changes to this Policy constitutes your acceptance of any such changes. This Policy is effective as of September 2022.