

Privacy Policy

At QUBER, our most important asset is your trust.

Last Updated as of April 27, 2022

Protecting your privacy is really important to us. QUBER is committed to maintaining the accuracy, security and confidentiality of your personal information in accordance with applicable legislation. With this in mind, we're providing this Privacy Policy to explain our practices regarding the collection, use and disclosure of information that we receive through our website located at <https://www.qubersavings.com> (the "Site") and our services accessible via our mobile device application (the "App") (together, the "Services").

This QUBER Privacy Policy ("Policy") describes how the QUBER Technology Inc. ("QUBER" or "we") collects, uses and discloses personal information of our Site visitors and our Service customers (collectively "customers" or individually "you"). By using the Services, you consent to the use of your personal information in accordance with this Policy and our Terms and Conditions. Unless otherwise defined in this Policy, terms used in this Policy have the same meanings as in our Terms and Conditions, accessible from <https://www.qubersavings.com/terms>.

1. What personal information do we collect?

"Personal information" is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an identifiable individual. The types of personal information that QUBER may collect about its customers include (but are not limited to) your contact details and the types of information described below.

Identifiers: QUBER may collect identifiers such as full name (first, middle, and last name), residential address, date of birth, Social Security Number (for users based in United States) or Social Insurance Number (for users based in Canada), Internet Protocol address, phone number, driver's license or email address. These are sourced directly from you or indirectly from you (e.g., from observing your actions on the Services or through our business partners or through our corporate affiliates). They are used to fulfill or meet the reason you provided the information, to contact you in relation to our Services, to respond to an inquiry, for product and service improvement, to screen for potential risk or fraud, to provide customer service, or

marketing. We disclose identifiers for business purposes to third party business partners, banking partners, internet service providers and administrative service providers.

Bank Account Information: When you link a bank account that you hold with a financial institution (“Bank Account”) to your QUBER Account, we will collect certain information from you about your Bank Account, such as your online login credentials for the purpose of providing the Services to you. If you give us access to your Bank Account, you acknowledge and agree that we will have access to your transaction information and your Bank Account balance (“Financial Information”) that we require in order to provide the Services to you.

You may link one or several Bank Accounts to your QUBER account. You will select one Bank Account to be your Primary Bank Account. Your Primary Bank Account is used to move money in and out when you are saving for goals (money moves out of your Primary Bank Account) or have achieved your goals and cash-out your jar (money moves into your Primary Bank Account). We disclose Bank Account information for business purposes to administrative service providers and the financial institutions.

Commercial information: This may include records of services purchased, obtained, considered, or other purchasing or consuming histories or tendencies. We source this information directly from you. We use this information to fulfill or meet the reason you provided the information, to contact you in relation to our Services, to screen for potential risk or fraud, to respond to inquiries, to provide the products and Services that you have ordered or requested, to provide customer service, or marketing. For example, we keep track of your subscriptions to create a subscription purchase history. We disclose this information for business purposes to internet service providers, administrative service providers, and payment processors.

Characteristics of protected classifications: QUBER may collect characteristics of protected classifications such as age or gender. We source this information directly from you. We use this information to fulfill or meet the reason you provided the information, marketing, or to provide relevant services. We do not disclose this information to third parties.

Information Sent by Your Mobile Device: We collect certain information that your mobile device sends when you use our Services, like a device identifier, user settings and the operating system of your device, as well as information about the use of our Services. We source this information indirectly from you (e.g., from observing your actions on the Services). We disclose

information sent by your mobile device for business purposes to administrative service providers.

Location Information: When you use our App, we may collect and store information about your location by converting your IP address into a rough geo-location or by accessing your mobile device's GPS coordinates or coarse location if you enable location services on your device. This information is sourced directly from you or indirectly from you (e.g., from observing your actions on the Services). We may use location information to improve and personalize our Services for you. If you do not want us to collect location information, you may disable that feature on your mobile device. We disclose location information for business purposes to administrative service providers.

Inferences Drawn from Other Personal Information: QUBER may collect inferences drawn from other personal information, which may include a profile reflecting a person's preferences, interests, and characteristics. We source this information directly or indirectly from you (e.g. from observing your actions on our Services). We use this information to fulfill or meet the reason you provided the information or for marketing. We do not disclose this information to third parties.

Your Online Activity - How We Use Cookies and Plug-Ins: We may also collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our Site. This information may be used, for example, to alert you to software compatibility issues, or it may be analyzed to improve our design and functionality and service. Cookies are alphanumeric identifiers in the form of text files that are inserted and stored by your Web browser on your computer's hard drive. QUBER may set and access cookies on your computer to track, gather and store preferential information about you. This information may be used, for example, to alert you to software compatibility issues, or it may be analyzed to improve our design and functionality and service. This information is sourced indirectly from you (e.g., from observing your actions on the Services). We encode our cookies to prevent others with whom we do not have a relationship with from being able to interpret the information stored in them. Note that most Internet browsers will allow you to stop cookies from being stored on your computer and to delete cookies stored on your computer. If you choose to eliminate cookies, the full functionality of the Services may be impaired for you.

The Services also integrate certain third-party plug-ins (such as a Facebook like button). Even if you do not click on these plug-ins, they may collect information about you, such as your IP

address and the pages that you view. They also may set and/or access a cookie. These plugins are governed by the privacy policy of the company providing them.

We May Use Third Party Providers to Help Us Improve Our Services and to Target Online Advertising:

We may also use third party service providers to help us analyze certain online activities. For example, these service providers may help us measure the performance of our online campaigns or analyze visitor activity. We may permit these service providers to use cookies and other technologies to perform these services for us. We do not share any personal information about our customers with these third-party service providers, and these service providers do not collect such information on our behalf. The Services also enable third-party tracking mechanisms to collect your non-personal information for use in online behavioral advertising. For example, third parties may use the fact that you visited the Website to target online ads for QUBER services to you on non-QUBER websites. In addition, our third-party advertising networks might use information about your use of the Services to help target non-QUBER advertisements based on your online behavior in general. For example:

- **Google Analytics:** To help facilitate the delivery of relevant content, we use Google Analytics. Google Analytics uses cookies to report on user interactions on our and others' websites. We use the data collected for optimizing marketing, refining advertising and/or programming strategies, and generally improving user experience. For more information about Google Analytics and how it collects and processes data, please visit: <https://policies.google.com/technologies/partner-sites> and instructions on opting out of Google Analytics using a specific plug-in is available at the following link: <https://tools.google.com/dlpage/gaoptout>. Note that this opt-out is specific to Google activities and does not affect the activities of other ad networks or analytics providers that we may use.
- **Facebook Analytics:** We also use Facebook Analytics to measure your use of our Services, tailor our Services to your interests, and improve our products and services. Please note, Facebook can connect this data with your Facebook account and use it for its own advertising purposes, in accordance with Facebook's Data Policy which can be found at [Facebook.com/about/privacy/](https://www.facebook.com/about/privacy/). Please click [here](#) if you would like to withdraw your consent.

For information about behavioral advertising practices, including privacy and confidentiality, visit the Network Advertising Initiative website or the Digital Advertising Alliance website. The use of online tracking mechanisms by third parties is subject to those third parties' own privacy policies, and not this Policy. If you prefer to prevent third parties from setting and accessing cookies on your computer, you may set your browser to block cookies. Additionally, you may remove yourself from the targeted advertising of companies within the Network Advertising Initiative by opting out [here, or of companies participating in the Digital Advertising Alliance](#)

[program by opting out here](#). Although our website currently does not respond to do not track browser headers, you can limit tracking through these third-party programs and by taking the other steps discussed above.

Linking to Social Media Apps, Apple Health Kit, Extensions and other Apps on your Mobile

Device: If you choose to link your QUBER account to Apple Health Kit, social networks or social apps or other apps and extensions, we will have access to the data associated with your social network accounts, Health / Fitness/ Wellness /Lifestyle/ Financial Apps and we may use such information to send you advertising information. You can always “opt out” of receiving such advertisements.

Notwithstanding the sharing of information described below, neither QUBER nor any of its affiliated companies share any of your personal information collected via Apple Health Kit.

Refer-a-Friend: We offer a feature that allows you to share a message with a friend encouraging him or her to use QUBER. If you choose to use this feature, we will ask you for the recipient’s name and email address and/ or phone number, along with the text of any message you choose to include, or you may be able to use a prepopulated message. By using this feature, you represent that you are entitled to use and provide us with the recipient’s name, email address and/ or phone number for this purpose.

Other Information: From time to time we may request other personal information to provide you with other benefits of the Services. In all such instances, you will be given the opportunity to provide or to decline to provide that information, and it will be used only for the stated purpose. We may combine the personal information we collect from you with information we collect from other sources, both offline and online. This includes any information you provide to us while using our Services as well as when, where, and how you:

- make payments, purchases and transfers or
- your use of our website, mobile application or services or
- any other services provided by our partners.

Your decision to provide any personal information is voluntary. However, please note that, if you do not provide certain personal information, we may not be able to accomplish some purposes outlined in this Policy and you may not be able to use or access certain Services.

2. Why do we collect your personal information?

In general, QUBER collects, uses and discloses personal information about you for the purposes of establishing, managing or terminating the customer relationship. More specifically, we collect, use and disclose your personal information for the following purposes:

- to analyze site usage and improve the Services;
- to deliver to you any administrative notices, alerts and communications relevant to your use of the Services;
- to market products and services that we believe may be of interest to you;
- to fulfill your requests for certain products and services;
- for market research, project planning, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity;
- to de-identify your personal information and create aggregated data, as discussed below;
- to enforce our Terms and Conditions; and
- to protect the security of the QUBER Services;
- to detect and protect QUBER, its affiliates, and other third parties against error, theft, fraud and other illegal activity, and to comply with QUBER's and its affiliates' audit requirements, and to audit compliance with QUBER's policies and contractual obligations;
- to engage in and completing business transactions, including the purchase, sale, lease, merger, amalgamation or other type of acquisition, disposal, securitization or financing involving QUBER or its affiliates;
- for purposes permitted by and to comply with any legal or regulatory requirements and laws; and
- for such purposes otherwise identified to you from time to time or as you may otherwise consent.

3. To whom do we disclose your personal information?

From time to time, QUBER may use and disclose your personal information for the purposes described in this Policy or for any additional purposes for which we have obtained your consent. QUBER may share your personal information with our customers, contractors,

consultants, administrative service providers, and other parties who require such information (including to corporate affiliates and other third parties located overseas) to assist us with establishing, maintaining and managing our relationship with you. Below we provide further details regarding the circumstances under which we may transfer or disclosure your personal information to others.

Our Service Providers: In particular, QUBER and its affiliated companies use third-party service providers to help us manage and improve the Services. These service providers may collect and/or use your personal or other information to assist us in achieving the purposes discussed above in the section entitled Why Do We Collect Your Personal Information?. For example, we use third parties to host features of our Services and to help us target and implement our email communications and direct mailings. We also use third-party platforms to help us manage our relationships with the people and companies that use our services. And we use third parties to assist us with market research, troubleshooting problems, and detecting and protecting against error, fraud or other criminal activity.

Our Business Partners: We may also transmit your personal information to our banking partners in order to meet legal requirements. We may also share your personal information with other third parties when necessary to fulfill your requests for services; to complete a transaction that you initiate; to meet the terms of any agreement that you have with us or our partners; or to manage our business. In particular, we may share certain information with financial institutions and our other partners to provide the service features that you elect to use. For example, if you provide your online login information for financial accounts to us, we may disclose that to your financial institution or its intermediary in order to establish a connection between your financial account and your QUBER account, and thereby obtain access to your financial records. Similarly, if you link your QUBER account to other services (such as fitness apps), we may share your personal information in order to provide the service features you have requested. And if you apply for a financial product or service, we will disclose any personal information that the financial institution requires to complete the transaction in question.

Information Shared with our Marketing Partners: We will never share your Financial Information with our marketing partners without your express consent, but we may use your Financial Information to generate offers for financial products and services from our marketing partners that may be of interest to you. It is always your choice whether or not to apply for an offered product or service and we will never submit an application for a financial product or service on your behalf without your express consent. If you choose to pursue any of the offers that the Services present to you, you will be asked if you would like the Services to pass on your

contact details and relevant Financial Information to the third party marketing partner as a convenience. For example, if the Services generate an offer from a third party insurance provider for you, the Services will give you the option of moving forward with that offer within the App, and if you agree to do so, the Services will pass your contact details and relevant Financial Information to that third party loan provider to speed up the process of your application.

Our Community and the Public: The Services contain comment fields and other features that permit you to share information publicly. The Services also may enable you to share personal information with websites or online services operated by third parties. For example, the Site contains links and widgets for third-party websites that incorporate comment and social media features. If you choose to use these features, you may disclose your personal information not just to those third-party websites and services, but also to their users and the public more generally. If you don't want people to know your email address, for example, don't include it in any message you post publicly. PLEASE BE EXTREMELY CAREFUL WHEN DISCLOSING ANY INFORMATION IN PUBLIC POSTING AREAS. WE ARE NOT RESPONSIBLE FOR THE USE BY OTHERS OF THE INFORMATION THAT YOU DISCLOSE IN PUBLIC POSTING AREAS. Because these third-party websites and services are not operated by QUBER, we are not responsible for the content or practices of those websites or services. The collection, use, and disclosure of your personal and non-personal information will be subject to the privacy policies of the third party websites or services, and not this Policy.

Other Disclosures: QUBER reserves the right (and you authorize QUBER) to share or disclose your personal information when QUBER determines, in its sole discretion, that the disclosure of such information is necessary or appropriate in the following circumstances:

- Legal purposes. We also may use or share your personal or non-personal information with third parties when we believe, in our sole discretion, that doing so is necessary;
 - To comply with applicable law or a court order, subpoena, or other legal process;
 - To investigate, prevent, or take action regarding illegal activities, suspected fraud, violations of our terms and conditions, or situations involving threats to our property or the property or physical safety of any person or third party;
 - To establish, protect, or exercise our legal rights or defend against legal claims; or
 - To facilitate the financing, securitization, insuring, sale, assignment, bankruptcy, or other disposal of all or part of our business or assets.
- Business transactions: Finally, your personal information may be transferred to a third party as a result of a sale, acquisition, merger, reorganization or other change of control,

reorganization, bankruptcy, or asset sale. If we sell, merge or transfer any part of our business, part of the sale may include your personal information following completion of such transaction and/or during the assessment process pending transfer. If transferred in such a case, the purchaser will abide by the terms and conditions of this Policy.

4. How do we protect your personal information?

The security of your personal information is important to us. We utilize physical, technical, and organizational security measures to protect against loss, misuse, and alteration of information under our control. We offer industry standard robust practices and security measures to safeguard and secure the personal information we collect. We use a combination of firewall barriers, encryption techniques and authentication procedures, among others, to maintain the security of your session on QUBER App and to protect QUBER accounts and systems from unauthorized access. When you register for the Services, QUBER requires a password with strong complexity requirements from you for your privacy and security. Any information collected by QUBER is transmitted / stored securely, following industry standards, tools & methodologies. All communications between your device and QUBER are encrypted. This enables client and server applications to communicate in a way that is designed to prevent tampering and message forgery.

However, no method of transmission over the Internet, or method of electronic storage is 100% secure. Consequently, we cannot ensure or warrant the security of any information you transmit to us and you understand that any information that you transfer to us is done at your own risk. If we learn of a security systems breach we may attempt to notify you electronically so that you can take appropriate protective steps. By using the Services or providing personal information to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of the Services. We may post a notice via our Services if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

You play a role in protecting your information as well. You are responsible for keeping your Login ID, Password, Mobile Device, and Email Account Confidential We maintain strict rules to help prevent others from guessing your password. We also recommend that you change your password periodically. You are responsible for maintaining the security of your Login ID and Password. You may not provide these credentials to any third party. If you believe that they have been stolen or been made known to others, you must contact us immediately at support@quber.ca, but in any event you should change your password immediately via the Services. You also agree that you control and limit access to the email account and mobile device. If your email address changes, you are responsible for informing us of that change. We are not responsible if someone else accesses your account through Registration Information

they have obtained from you or through a violation by you of this Policy or the Terms and Conditions.

5. Where is your personal information stored?

Your personal information is stored in secured locations and on servers that are located either at our offices or at the offices of our service providers within Canada or the United States. For access to your personal information, please contact our Privacy Officer via the contact information below.

6. How can you access your personal information and what are your privacy rights?

You may have certain rights regarding your personal information under applicable law.

Right to Access/Know/Portability: You may have a right to know, access, and receive a portable copy of your personal information. Upon written request, subject to certain exceptions, QUBER will inform you of the existence, use, and disclosure of your personal information and will give you access to that information. You may also request a copy of the personal information we have collected, and upon request, we will provide this information to you in electronic form.

Right to Correction: You should advise QUBER if you believe that your personal information is inaccurate. You may have the right to ask for it to be corrected or updated. We may ask you to provide documentation to support your request for correction or updating. Always Keep Your Personal Information Up to Date to Gain Full Access It is your responsibility to keep your personal information up to date by updating your QUBER application settings. We are not responsible for costs or other issues arising from you not keeping your personal information up to date. In order to benefit from the full functionality of the Service, you must provide your third-party account log ins to allow QUBER and our partners to access your account data at those financial institutions for your use., you must provide your third-party account log ins to allow QUBER and our partners to access your account data at those financial institutions for

your use, you must provide your third-party account log in to allow QUBER and our partners to access your account data at those financial institutions for your use.

Right to Delete: You may have a right to request that we delete personal information under certain circumstances. You can delete your personal information any time by requesting to have your account deleted for the Services. If you do so, your personal information will be permanently removed from our servers and further access to your account will not be possible. We will also promptly disconnect any connection we had established to your Account Information (see below) and delete all account credentials. However, portions of your personal information, in de-identified and aggregate forms, may remain on our system indefinitely. We reserve the right to use this aggregate data to improve our service and for other lawful purposes, as discussed below. Also, please note that we also may need to store your data as required by federal, provincial or local law, even if you request that we delete it. Merely deleting the app from your device does not constitute a request to delete your account.

Right to Opt Out: Under certain laws, you may have a right to opt-out from certain activities, such as “sales” or “sharing” of personal information, processing of sensitive personal information, targeted advertising, or profiling in furtherance of decisions that produce legal or similarly significant effects. We do not “sell” personal information and we do not knowingly “sell” the personal information of children under 16 years old.

Right to Non-Discrimination: You have the right not to be discriminated against for exercising any of these rights.

Applicable law or regulatory requirements may allow or require us to deny certain requests, such as where an access request would inhibit the ability of QUBER to comply with a legal obligation; where it has already been destroyed due to legal requirements or because we no longer need it for our business purposes and where access would reveal personal information about a third party. In the event that we cannot provide you with access to your personal information, we will inform you of the reasons, subject to any legal or regulatory restrictions and if you would like to appeal the decision, please provide us notice through the contact method listed at the end of the Policy.

requests should be sent to our Privacy Officer, using the contact information in the “Contact Us” section below. e may request specific information from you to enable us to confirm your identity. [to make requests on your behalf. Before accepting such a request from an agent, we will require the agent to provide proof that you have authorized the agent to act on your behalf, and we may need you to verify your identity directly with us.](#)

Financial Incentives: We may offer various financial incentives from time to time. The terms of a financial incentive will be provided at the time you sign up for a financial incentive. You may withdraw from any of the financial incentives. We have calculated the value of a financial incentive by using the expense related to the offer, and the value of your data is the value of the offer presented to you.

8. International Transfer of Personal Information

If you choose to provide us with personal information, we may transfer that personal information to third parties, in accordance with local law. We may also transfer your personal information across borders, from your country or jurisdiction to other countries or jurisdictions in accordance with legal requirements. By providing personal information, you agree that your personal information may be transferred to, and maintained on, computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those in your jurisdiction. QUBER may rely on legal mechanisms for international transfer, as appropriate under the relevant law.

9. Children

We do not knowingly collect personal information from anyone under the age of 18. If you are a parent or guardian and you are aware that your children have provided us with personal information, please contact us. If we become aware that we have collected personal information from children, we take steps to delete that information.

10. How We Respond to Do Not Track Signals

The “Do Not Track” (“DNT”) privacy preference is an option that may be made in some web browsers allowing you to opt-out of tracking by websites and online services. At this time,

global standard DNT technology is not yet finalized and not all browsers support DNT. We therefore do not recognize DNT signals and do not respond to them.

11. Record Retention Policy

We will maintain your personal information for our records for as long as necessary to fulfill the purpose for which it is collected and in accordance with legal obligations, our record retention policy, to resolve disputes, and to enforce our agreements.

12. Changes to this Policy

QUBER reserves the right to modify or supplement this Policy at any time. If any changes are made to this Policy, we will notify you by posting a copy amended Policy on our website at www.qubersavings.com as soon as practicable following that update. Your continued use of the Services following such notification will be deemed to constitute your consent to such revised terms. If we make a material change to the Policy, we will let you know via email and/or a prominent notice on our Services, prior to the change becoming effective and update the "Last Updated" date at the top of this Policy. You are advised to review this Policy periodically for any changes. Changes to this Policy are effective when they are posted on this page. By continuing to use our Services you are agreeing to be bound by any changes or revisions made to this Policy.

13. Contact Us

QUBER has a Privacy Officer to oversee compliance with this Policy. Should you have questions about this Policy or collection, use and disclosure practices of QUBER, you may contact the Privacy Officer in writing as indicated below:

Privacy Officer
QUBER Canada

232 Botsford Street, Moncton NB, Canada E1C 4X7
privacyofficer@guber.ca

The Privacy Officer will use reasonable efforts to respond promptly to requests, questions or concerns you may have regarding QUBER's use of personal information.