

Privacy Statement

WESTERN UNION FINANCIAL SERVICES (CANADA), INC. PRIVACY STATEMENT

Effective Date: February 1, 2013

This Privacy Statement describes how Western Union Financial Services (Canada), Inc. (“**Western Union Canada**”, “**we**”, “**us**” and “**our**”) collects, uses and discloses your personal information. “Personal information” is information about an identifiable individual, as defined or limited under applicable Canadian privacy legislation. This Privacy Statement applies to personal information about our consumers and business customers and other individuals we deal with in Canada (“**you**” and “**your**”).

INFORMATION WE COLLECT

Western Union Canada collects personal information about you or your recipients from a variety of sources in the course of providing money transfer, payment services, loyalty and membership programs, related products and services. We collect the following types of personal information, to include the following:

- Personal information you provide when you send or receive money or to provide other goods or services, by telephone, online at our Web site, through paper-based forms at Western Union agent locations.
 - Personal information may include identities and contact information of senders and recipients of money transfers or payments, credit card, banking or other billing information, birth dates, identification number and amounts paid or transferred, “out of wallet” questions used to verify your identity for security and fraud prevention purposes, and other personal identifiers.
- Personal information provided when you complete and submit applications or other forms to us or our affiliates, including in connection with sending and receiving money transfers, through your enrolment and participation in loyalty or membership programs.
- Transactional information, including transaction history, such as frequency of use and amounts transferred.
- Personal information provided for identify verification, fraud prevention and security purposes, to confirm certain identity-related information, financial background and similar information through third parties sources such as our business partners, government and consumer reporting agencies;
- We collect information regarding your online activity as described in the section below titled “INTERNET TECHNOLOGY.”
- Personal information provided to comply with or as required by law.

HOW WE USE PERSONAL INFORMATION

Western Union Canada uses personal information in the course of its money transfer, payment services, loyalty and membership programs, and related services and products for the following purposes:

- Authorizing and processing your transactions, including effecting and administering money transfers, payments and verifying proper payment to the designated recipient of funds.
- Collecting amounts owing to us, and otherwise enforcing and collecting on your accounts or agreements with us.

- Meeting legal, regulatory, risk management, fraud prevention and security requirements, such as verification of identities against money laundering, terrorist financing or similar watch lists established by Canadian or international regulatory agencies and identity verification of senders and recipients of money transfers or payments before releasing funds.
- For marketing and promotional purposes, as described in “Offers, Promotions and Opting Out” below.
- Managing and administering our business in connection with the Western Union Canada’s transactions relating to business or assets.
- Meeting insurance, audit and processing requirements.
- Otherwise as permitted or required by law.

INFORMATION WE DISCLOSE

We may disclose your personal information to our affiliates and to authorized unaffiliated third parties in connection with the purposes described as follows:

- In order to process and complete requested money transfers and payments, disclosures to may include; the recipient of a money transfer or payment, local Western Union affiliates and agents at the sender’s or receiver’s location, as applicable, and, if applicable, the recipient and any intermediary banks or other financial institutions or financial services companies involved in the transaction.
- To provide notifications of the status of your money transfer or payment.
- To administer the loyalty or membership programs that you participate in.
- To provide commercial communication services for marketing and promotional purposes, unless you “opt out” or withdraw consent to this disclosure, as described in “Offers, Promotions and Opting Out”.
- Transfer to outside agents or service providers (including affiliates of Western Union Canada acting in this capacity) that perform services on our behalf, for example information technology and/or data hosting or processing services providers of which may be located in countries outside of Canada, such as the United States.
- To assess or contemplate: financing, securitization, insuring, sale, assignment or other disposal of all or part of our business or assets (including, for example, your service account with us), for purposes related to the evaluation and performance of these transactions, to evaluate and determine whether to proceed or continue with the transaction, fulfilling reporting, inspection or audit requirements or obligations to such parties such as successors and assignees of Western Union Canada and/or its business or assets.
- To meet legal, regulatory, insurance, audit, and security requirements, and as otherwise with your consent or as permitted or required by law (including as required by applicable Canadian and foreign laws). This may include lawful requirements to disclose personal information to government authorities in Canada and in foreign countries, for compliance with suspicious activity reporting requirements under anti-terrorism, anti-money laundering and similar laws and regulations.

OFFERS, PROMOTIONS AND OPTING OUT

Western Union Canada may use your contact details and information about your use of our services (e.g. frequency, value of money transfer, or destination country) for marketing and solicitation purposes, to send you offers, promotions, administer your loyalty or membership account, or provide information about additional products and

services of Western Union Canada, our affiliates and third party products/services that may be of interest to you. Use and disclosures to third parties for these purposes may include, as examples:

- Western Union Canada's affiliates
- Authorized Western Union agents
- Financial services companies, such as banks, credit card companies, brokerage houses, mortgage lenders and mortgage originators
- Non-financial companies such as retailers, catalogue companies, direct marketers, telephone companies, airlines, publishers and other providers of goods and services.

You may "opt out" or withdraw consent to the use and/or disclosure of your personal information for the purposes described in this section at any time by checking the appropriate box on an online or offline form, if available, or by calling **1-800-235-0000** or **1-800-562-2598** or otherwise by contacting us as described in "Contact Us" below. If you do not "opt out" or withdraw your consent as described above, we will assume that you consent to our use and disclosure of your personal information for marketing and solicitation purposes as described in this section.

INTERNET TECHNOLOGY

Some of Western Union Canada services (for example money transfers) are made available using online forms at our Web site, www.westernunion.ca. When visit or use our Web sites, we collect information about the domain and host from which you access the Internet; your computer's Internet address; the browser and operating system software you use; the date and time you access our Web site and the Internet address of the site from which you linked to our Web site. We use this information to diagnose, administer and optimize our Web sites and web-related services.

When registering or creating an account at our Web sites, we collect your password and login name and other information we may request in order to identify you, maintain security of our Web site and verify and control access to your account or online profile. If you make inquiries through the e-mail links, forms or other contact methods provided on our Web sites, these inquiries are forwarded to the relevant office or department, and are used to respond to your inquiry and maintain a record of correspondence.

We use Internet technologies like cookies and web beacons to facilitate the services we provide on our Web sites and your use of our Web sites, including:

- To assist us in providing services to you;
- To allow you to change web pages during your visit without having to re-enter your password;
- To store your preferences and other information and to track activity on our website;
- To better understand the effectiveness of our promotional campaigns;
- To determine whether you came to our site from a banner ad or an affiliate website;
- To deliver Information specific to your interests on additional web sites; and
- To determine whether you've acted on our promotional messages

A "**cookie**" is a text file placed on your computer's hard drive by a web server, which allows for personalization of certain aspects of your visit to that Web site. "**Web beacons**" are transparent electronic images placed in the web code that collect non-personal data while visiting a web site. Cookies and web beacons can usually be disabled by changing your browser preferences. Refer to your browser documentation on how to disable cookies and web beacons. Note that disabling cookies may limit the performance and functionality of certain features of our Web sites, and registration or use your online account may be impacted.

CHILDREN'S PRIVACY

Our Web sites are not directed at children under the age of 13. Western Union Canada does not knowingly collect or maintain personal information at our Web site from those we actually know are under the age of 13.

EXTERNAL WEB SITES

Our Web sites may be linked to or from third party Web sites. These links are provided as a convenience only, and Western Union Canada is not responsible for the content or privacy practices of Web sites that are linked to or from our Web site. You are advised to review the privacy policies of any third party Web sites you visit.

YOUR CONSENT

Generally, by providing us with personal information, we will assume that you consent to our collection, use and disclosure of such information for the purposes described in this Privacy Statement, if applicable, or otherwise at the time of collection of your personal information. Consent can be express (for example, orally, electronically or on a form you may sign describing the intended uses and disclosures of personal information) or implied (for example, when you provide information necessary for a service you have requested). You may provide your consent in some circumstances where notice has been provided to you about our intentions with respect to your personal information and you have not withdrawn your consent for an identified purpose, such as by using an “opt out” option provided, if any. Consent may be given by your authorized representative (such as a legal guardian or a person having a power of attorney).

You may withdraw your consent to our collection, use and disclosure of personal information at any time for certain uses of your personal information, withdrawal is subject to contractual (provisioning of services) and legal restrictions and reasonable notice. Your consent will be valid for so long as necessary to fulfill the purposes described in this Privacy Statement and you may not be permitted to withdraw consent to certain necessary uses and disclosures (for example, but not limited to, maintaining reasonable business and transaction records, disclosures to Canadian and foreign government entities as required to comply with laws, and reporting on credit information after credit has been granted, if applicable).

We may also be required or permitted under statute or regulation to collect, use or disclose personal 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.

CONFIDENTIALITY AND SECURITY

We endeavor to maintain physical, electronic and procedural safeguards to protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Authorized employees, agents, representatives and mandatories that require access to your personal information in order to fulfill their job requirements will have access to your personal information.

No data transmission over the Internet or the telephone can be guaranteed to be perfectly secure, and any personal information you submit to us or access electronically or over the telephone is done at your own risk, and Western Union Canada does not guarantee or warrant the security of information transmitted in these manners. You should be aware that third parties may unlawfully intercept your transmissions or may wrongly instruct you to disclose personal information to them while posing as Western Union and you should exercise caution when providing personal information to any person.

Western Union record retention policies dictate that we maintain information about you, including your opt-out choices, for a fixed time period. If you do not perform another transaction during the fixed time period, your Information, as well as your opt-out choice will be removed. If you perform another transaction or otherwise provide us with personal information thereafter, you will be afforded another opportunity to opt-out.

ACCESS AND CORRECTION

Western Union Canada may establish and maintain a file of your personal information for the purposes described in this Privacy Statement, which will be accessible at the office of our affiliate, Western Union Financial Services, Inc. at 12510 E Belford Ave, Englewood, Colorado USA 80112. If you wish to request access or correction of your personal information in our custody or control, you may write to the mailing address provided below, attention Chief Privacy

Officer or as stated in the Contact Us section below. Your right to access or correct your personal information is subject to applicable legal restrictions. To protect your privacy and security, we may require additional information to verify your identity when requesting access or correction.

CHANGES

Western Union Canada reserves the right to modify this Privacy Statement from time to time. You can get updated Privacy Statements by calling us at the telephone number listed below or by visiting our Web site at **www.westernunion.ca**. We urge you to review this Privacy Statement frequently and your continued provision of personal information or use of our services following any changes to this Privacy Statement constitutes your acceptance of any such changes.

CONTACT US

To provide your personal choice (opt out) or to change account or contact information go to your **profile page by [clicking here](#)**. If you have questions about our privacy practices or Information we maintain about you contact us by **clicking here** and selecting 'Consumer Privacy' from the drop down menu.

We also accept questions by regular mail and by telephone at the locations identified below:

BY MAIL

Western Union Financial Services (Canada), Inc.
325 Milner Ave - 14th Floor
Scarborough, ON,
M1B 5N1

Or

Western Union Financial Services, Inc.
Western Union Privacy Office
12510 E Belford Ave
Englewood, CO 80112
USA

BY TELEPHONE:

1-800-562-2598 or 1-800-235-0000