

Privacy Policy & Security Practices

Security Practices

At Orion Digital Corp. (“Orion Digital”), we take security seriously and follow industry best practices in the design and implementation of our data security environment. Controls we use to ensure your online data is secure include, but are not limited to:

1. The use of the latest Transport Layer Security (TLS) protocols for encryption to protect customer information
2. Customer passwords and data are protected using the latest encryption technologies to guard against unauthorized access to our systems
3. AWS secure data centers to help protect data in our care
4. Regular third-party audits of our security practices
5. Multiple zones and layers on firewalls to protect our internal and external networks
6. Centralized Security Incident and Event Management (SIEM) is used to monitor unauthorized access to our systems
7. The use of many third-party tools to confirm the identity of people applying for any of Orion Digital’s products
8. Third party vendors are thoroughly vetted for their security practices

I - Our Commitment

Introduction

Orion Digital Corp., its divisions, subsidiaries and affiliates, which include Mogo Finance Technology Inc., IntelligentInvesting Wealth Management Inc. (including the Tactex Asset Management division), IntelligentInvesting Securities Inc., IntelligentInvesting Financial Technologies Inc. and Carta Solutions Holding Corp. (hereafter **“Orion Digital”**, **“we”**, **“us”** and **“our”**) are committed to protecting the Personal Information that Customers provide when they use the Sites and in the context of their interactions with Orion Digital.

The Policy applies to Orion Digital’s activities in Canada, including activities on the Sites and services offered by Orion Digital or one of its partners, where Orion Digital, or its suppliers on Orion Digital’s behalf, collect, use or disclose Personal Information about its Customers.

The purpose of this Policy is to inform Customers how Orion Digital collects, uses, discloses, retains and protects Personal Information.

Orion Digital has a designated Privacy Officer. Any questions regarding this Policy or the handling of Personal Information by Orion Digital should be addressed

directly to the Privacy Officer at privacy@oriondigitalcorp.com. The Privacy Officer has the authority to delegate privacy related matters to other qualified individuals within Orion Digital.

Definitions

For the purposes of this Policy, the following terms will have the following definitions:

"Site(s)" means all websites, including transactional sites, social media, mobile applications, and other platforms belonging to or provided by Orion Digital.

"Customer" or **"you"** means an individual who: (i) orders or purchases products or services from Orion Digital; (ii) corresponds with Orion Digital; (iii) participates in a survey or promotional contest organized by Orion Digital (iv) is a member of a rewards or referral program offered by Orion Digital; (v) uses an application or an online service of Orion Digital; or (vi) accesses any other customer service or Sites offered by Orion Digital.

"Personal Information" means any information that relates to a natural person and allows, directly or indirectly, that person to be identified, including but not limited to names, mailing addresses, email addresses, date of birth, credit information, and account numbers for Orion Digital programs or applications.

II - What is Personal Information?

Definition of Personal Information

Personal Information is information about an identifiable individual, including any information that, alone or combined with other information, could be used to identify an individual.

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

III - Privacy 101

Why?

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

- We collect Personal Information for the purposes of managing and administering our business. This includes enabling us to verify and approve you for our products. We may collect Personal 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 Sites.
- We inform you when collecting your Personal Information whether certain Personal Information is mandatory or optional. Mandatory Personal Information is necessary for the operation of our product(s) and service(s). Regarding optional Personal Information, you are free to provide it or not. We also tell you the possible consequences of a failure to provide mandatory Personal Information.

What?

Personal Information we collect includes, but is not limited to:

- Name, address, email address, mobile phone number and other contact information
- Bank account information, including bank account, transit and institution numbers and other banking information collected from your bank statements
- 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
- Personal Information you provide to us in connection with your use of the Sites and otherwise when you obtain services from Orion Digital
- Name and contact information of personal references, and in the case of self-directed and managed investment accounts, a trusted contact person, should you choose to provide one
- Personal 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, Orion Digital retains this information for a period of time commensurate with our anti-money laundering and anti-terrorist regulatory requirements
- Personal Information relating to ongoing interactions with Orion Digital, including inquiries or complaints, and similar information
- Social Insurance Number (SIN), 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 Personal Information with entities like Orion Digital
- Personal Information we collect automatically when you visit our Sites (see “Cookies and Similar Technologies” below)
- Personal 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 Personal Information that you choose to communicate to us about you via support channels
- Other Personal Information collected with your consent or as permitted or required by law

Orion Digital will only retain Personal Information to the extent necessary for the purposes identified in this Policy, or to which you might otherwise consent, after which your Personal Information will be securely destroyed or irreversibly erased or de-identified.

Personal Information may be stored “in the cloud” or otherwise outside of Canada, where it may be subject to the legal regime of the jurisdiction in which it is stored. For residents of Quebec, your Personal Information may be stored “in the cloud” or otherwise outside of the Province of Quebec and Canada.

Note that, in some cases, Orion Digital may retain some of your Personal Information for a reasonable period of time for legal, administrative or compliance purposes.

As noted below, under the section “Your Choices”, you may request deletion of your Personal Information, subject to Orion Digital’s obligation to retain it as required by applicable regulatory obligations.

How?

We’re transparent about how we collect, use, disclose, and safeguard Personal Information in connection with our business in Canada.

We may use your Personal Information:

- to open, maintain, service, process, analyze, audit, and collect on an account
- to communicate with you in respect of your account or other Orion Digital 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 Orion Digital 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 Personal 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
- for marketing and analytics purposes, including to display targeted advertising
- to render a decision based exclusively on an automated processing of the collected Personal Information, as set out in the Automated Processing section below
- for other purposes with your consent or as permitted or required by law

We may also collect Personal Information from individuals when they apply for employment through our Sites or otherwise. We use this Personal Information solely for the purpose of processing and responding to such applications.

When?

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

- We may exchange Personal Information on an ongoing basis with consumer and credit reporting agencies so they can verify your Personal Information, ensure the completeness of the Personal 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 Personal Information to our affiliates for internal audit, management, billing or administrative purposes including defending and bringing legal actions.
- We may disclose Personal 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 an Orion Digital product or service to finance the purchase of goods from a supplier, whether directly or through a third-party provider, we may disclose Personal Information to the supplier and/or third-party provider as necessary to facilitate that transaction. We will limit our disclosure of your Personal Information to such third parties to that which is reasonably necessary for the purpose or service for which the third-party service provider is engaged. We will use contractual and other means to provide a comparable level of protection while the information is being processed by such third parties, including limiting such providers to using your Personal Information solely to provide Orion Digital with the specific service for which those providers were engaged, and for no other purpose. You can obtain more information about our policies and practices with respect to the use of Personal Information by third party service providers by contacting us at the addresses provided under “Contacting Us”.
- From time to time, we may disclose to third parties aggregated or de-identified data, which does not contain Personal Information or other information regarding identifiable individuals. We may use third parties such as ad networks, social media and other advertising companies to serve more relevant advertisements on our Sites and apps and on other websites or apps and to better understand our Customers. We may provide a hashed version of your email address or other non-sensitive

information to the platform provider for such purposes. These companies may use cookies, pixels, tracer tags or web beacons to report certain information about your visits to our Sites and other websites and apps (such as web pages you visit and your response to ads) in order to measure the effectiveness of our marketing campaigns and to deliver ads that are more relevant to you, both on and off our Sites and apps.

- Orion Digital may use and disclose Personal Information in connection with the proposed or actual financing, securitization, insuring, sale, assignment, transfer or other disposals of all or part of Orion Digital 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 Orion Digital or our business or assets may use and disclose your Personal Information for similar purposes as those described in this Policy.
- We may disclose your Personal 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.

We do not otherwise rent or sell your Personal Information to any third parties, unless your additional consent to do so is obtained.

IV - How We Use and Share Personal Information for Marketing Purposes

Marketing purposes With your consent, we may use your Personal 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 Personal Information, including contact information and credit and financial information, with our affiliates, divisions 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 Orion Digital companies 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 Personal Information for marketing purposes, as described above, please contact us by email at the email provided in the corresponding Site.

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 Orion Digital product(s) or service(s).

V - How We Protect Your Personal Information

Personal Information in Canada

We use physical security measures that are technological and administrative to protect the Personal Information we collect from you. We take all useful precautions to preserve the security, integrity and confidentiality of your Personal 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 Personal 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.

Personal Information across borders

We may transfer Personal 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 Personal 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 Personal 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 Personal 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 Personal Information at the same high level that we have committed to.

VI - Cookies and Similar Technologies

Cookies and similar technologies

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

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

The Sites also use web cookies and pixel tags to track user behaviour on our Sites 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 Sites, we may also use analytic tools and automated tracking technology or methods. We use these tools to analyze and enhance the user experience. The Sites may use third-party advertising networks to display advertising on our Sites or other websites. These advertising networks use cookies or similar technologies to track your navigation habits on our Sites 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 Site, which is recognized and used by third-party advertising networks to serve you with an 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>.

Our websites may also use a technology called “tracer tags” or Web Beacons”. A web beacon is a small transparent graphic image that allows us to record simple user actions related to our Sites and to email communications received from us, to help us determine the usage and effectiveness of our Site and communications. These “images” are automatically loaded to your browser/device when you visit the website or open an html format email message from us, thereby letting us know if a certain page was visited or an email message was opened. This technology allows us to understand which pages you visit on our Sites. These tracer tags are used to help us optimize and tailor our Sites for you and future visitors.

We may use a third party such as Google Analytics to help us gather and analyze information about the areas visited on the websites (such as the pages most read, time spent, search terms and other engagement data) in order to evaluate and improve the user experience and the convenience of the Sites. For more information or to opt-out, see [“How Google uses data when you use our partners’ sites or apps”](#) and [“Google Analytics and Privacy”](#).

VII - Automated Processing

Requests for information

From time to time, we may render a decision based exclusively on an automated processing of the Personal Information collected. We recognize that you have the right to know if your Personal Information is being processed by a solely automated decision-making process and to be informed before such processing. We will, at your request, inform you of the Personal Information that was used to render such a decision, of the reasons and the principal factors and parameters that led to the decision and of your right to have the Personal Information used to render the decision in question corrected. We will give you the opportunity to present your observations regarding the decision to a representative of Orion Digital who can revise said decision.

VIII - Third-Party Websites

Other websites	We may provide links to other websites that are not operated or controlled by Orion Digital. 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 Personal Information.
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. 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.

IX - Your Choices

Consent	<p>Orion Digital collects, uses and discloses your Personal Information with your consent, or as permitted or required by law. Generally, by providing us with your Personal Information, we will assume that you consent to our collection, use and disclosure of such Personal Information for the purposes identified or described in this Policy, if applicable, or otherwise at the time of collection.</p> <p>We may 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.</p> <p>You may withdraw your consent to our collection, use and disclosure of your Personal 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.</p> <p>Note that if you withdraw your consent to certain uses of your Personal Information, we may no longer be able to provide certain of our products or services.</p>
Access	<p>Upon request, you may examine the Personal Information that Orion Digital holds about you, except as provided by law. Where we are unable or unauthorized to provide access to all the Personal Information we hold about you, we will provide the reasons why and any recourse available to you. Where we receive a written request from you to examine Personal Information collected and retained, we will respond to the request within 30 business days. We will provide assistance upon receipt of an individual data access request. If such a request is not sufficiently precise or unclear, we will assist the individual in identifying the information sought. In the event of a refusal, the reasons for such refusal will be provided in addition to remedies available to the requesting applicant.</p> <p>You may request access to your Personal Information by making a request, in writing, to Orion Digital's Privacy Officer, at the addresses provided under 'Contacting Us'. Note that, in an effort to prevent fraudulent or unauthorized requests for access, we may request identification for authentication purposes.</p>

Correction You may also make a request to the Orion Digital Privacy Officer to correct any Personal Information that you feel is inaccurate or incomplete.

Deletion You may also request the deletion of your Personal Information, subject to legal and contractual restrictions; however, please note that deletion of some information may impact our ability to provide you with certain services.

X - Contacting Us

Contacting Us If you would like to opt-out of any uses of your Personal Information, obtain access, request correction or deletion, make a complaint, or generally have any questions or concerns about our Privacy Policy, you may contact the Orion Digital Privacy Officer at the address provided below.

516-409 Granville St
Vancouver, BC
V6C 1T2
Email: privacy@oriondigitalcorp.com

XI - Policy Update

We may revise this Policy from time to time, in response to legal developments, as new technologies become available, or as we introduce new features, products or services.

When we make changes to this Policy we will revise the “last update” date at the bottom of the page. You should check back here periodically to find out if any changes have been made. If we make substantial changes we will, as appropriate, prominently post these changes to our Sites or notify you directly.

If you disagree with any change to the Privacy Policy, you may close your account and refrain from using our services, or in some cases, opt out. Continuing to use our services, including our Sites, after we post or communicate a change signifies that you consent to the revised terms of the Policy.

On occasion, we may also identify new purposes for the collection or use of Personal Information, such as in connection with a new promotion or service. We will describe such uses in separate notices or other communications.

Last Updated: February 3, 2026