



407 Iroquois Shore Rd., Unit 8, Suite CM6  
Oakville, Ontario, L6H 1M3

1-833-55 -EQRAZ (37729)  
[service@eqrazhomes.com](mailto:service@eqrazhomes.com)  
[www.eqraz.com](http://www.eqraz.com)

# EQRAZ Inc. Privacy Policy



## September 2021

Your privacy is important to us. It's our priority to respect your privacy and comply with the applicable laws and regulations regarding any personal information we may collect about you, including across our website (<https://www.eqraz.com/>), other sites we own and operate, in email, text, and other electronic messages between you and this website, and/or through mortgage pre-qualifications or inquiries submitted to us or otherwise.

Privacy laws in Canada generally define "personal information" as any information about an identifiable individual, which includes information that can be used on its own or with other information to identify, contact, or locate a single person.

This Policy has been designed to comply with the *Personal Information Protection and Electronic Documents Act* ('PIPEDA') and explains:

- The Information we collect;
- How your Personal Information is used;
- How your Personal Information may be shared;
- How you may access the Information we retain, and how to update it
- Contact details for any queries or concerns you may have.

Please read this policy carefully to understand our policies and practices for collecting, processing, and storing your information. If you do not agree with our policies and practices, your choice is not to use our website. By accessing or using this Website, you indicate that you understand, accept, and consent to the practices described in this policy. This policy may change from time to time

## Information We Collect

Information we collect includes both information you knowingly and actively provide us when using or participating in any of our services and promotions, and any information automatically sent by your devices in the course of accessing our products and services.

## How we log data and collect information

When you visit our website, our servers may automatically log the standard data provided by your web browser. It may include your device's Internet Protocol (IP) address, your browser type and version, the pages you visit, the time and date of your visit, the time spent on each page, other details about your visit, and technical details that occur in conjunction with any errors you may encounter.

Please be aware that while this information may not be personally identifying by itself, it may be possible to combine it with other data to personally identify individual persons.

We may collect Personal Information from you directly, or through external sources including but not limited to:

- Law enforcement authorities
- Public records
- Details from a credit reporting agency
- Financial Institutions
- Other service providers

You authorize the collection of Personal Information from these sources, and where applicable, you authorize these sources to provide us your Personal Information.

## Personal Information

When you apply for, provide a guarantee in respect of, or use any product or service, and while you are our current or former client, or act on behalf of one, we may collect and confirm Personal Information about you such as:

- Personal identifiers (e.g., Name(s), Date of Birth, Marital status, addresses, contact number(s), email(s), ID number(s))
- Financial information (e.g., payment history, credit card information)
- Education information (e.g., student records)
- Online identifiers (e.g., IP address, cookie identifiers)
- Other information specific to physical, physiological, genetic, economic, cultural, or social identity like religious affiliation, ethnic origin, etc.

## Legitimate Reasons for Processing Your Personal Information

We only collect and use your personal information when we have a legitimate reason for doing so. In which instance, we only collect personal information that is reasonably necessary to provide our services to you.

## Collection and Use of Information

We may collect personal information from you when you do any of the following on our website:

- Sign up to receive updates from us via email or social media channels
- Use a mobile device or web browser to access our content
- Contact us via email, social media, or on any similar technologies
- When you mention us on social media

We may collect, hold, use, and disclose information for the following purposes, and personal information will not be further processed in a manner that is incompatible with these purposes:

- To provide products and services to you
- Engage in business transactions, including a purchase, sale, lease, merger, amalgamation or any

other type of acquisition, disposal, securitization of financing involving us or a part of our business;

- To process mortgage applications and/or inquiries you submit to us, either directly or through one of the mortgage brokers or agents
- Establish and maintain a commercial relationship with you, including to establish your identity and to fulfil contractual obligations
- Process payments in connection with your purchase of our products and services
- Prevent, discover and investigate violations of this privacy policy or any terms of service or terms of use, and to investigate fraud and other matters
- To contact and communicate with you
- For analytics, market research, and business development, including to operate and improve our website, associated applications, and associated social media platforms
- For advertising and marketing, including to send you promotional information about our products and services and information about third parties that we consider may be of interest to you
- To enable you to access and use our website, associated applications, and associated social media platforms
- For internal record keeping and administrative purposes
- To comply with our legal obligations and resolve any disputes that we may have
- For security and fraud prevention, and to ensure that our sites and apps are safe, secure, and used in line with our terms of use

Please be aware that we may combine information we collect about you with general information or research data we receive from other trusted sources.

## Obtaining Consent

We may obtain your consent via any of the following ways:

- Verbal Confirmation
- Electronic Confirmation
- Written Confirmation
- Implied Consent – when using a product or when you approach us for information on our products and services

We will not make your consent a condition of obtaining a product or service, unless it is reasonably or legally required, and we will clearly indicate when this is the case. By providing us with your personal information (whether through our websites or otherwise), or engaging with this website, you consent to our collection, use and disclosure of that personal information in accordance with this policy.

## Security of Your Personal Information

When we collect and process personal information, and while we retain this information, we will protect it within commercially acceptable means to prevent loss and theft,

as well as unauthorized access, disclosure, copying, use, or modification.

Although we will do our best to protect the personal information you provide to us, we advise that no method of electronic transmission or storage is 100% secure, and no one can guarantee absolute data security. We will comply with laws applicable to us in respect of any data breach.

You are responsible for selecting any password and its overall security strength, ensuring the security of your own information within the bounds of our services.

## How Long We Keep Your Personal Information

We keep your personal information only for as long as we need to. This time period may depend on what we are using your information for, in accordance with this privacy policy. If your personal information is no longer required, we will delete it or make it anonymous by removing all details that identify you.

However, if necessary, we may retain your personal information for our compliance with a legal, accounting, or reporting obligation or for archiving purposes in the public interest, scientific, or historical research purposes or statistical purposes.

## Children's Privacy

We do not aim any of our products or services directly at children under the age of 13, and we do not knowingly collect personal information about children under 13.

## Disclosure of Personal Information to Third Parties

We may disclose personal information to:

- a parent, subsidiary, or affiliate of our company
- Third party service providers for the purpose of enabling them to provide their services, for example, IT service providers, data storage, hosting and server providers, advertisers, or analytics platforms
- our employees, contractors, and/or related entities
- our existing or potential agents or business partners
- sponsors or promoters of any competition, sweepstakes, or promotion we run
- courts, tribunals, regulatory authorities, and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise, or defend our legal rights
- third parties, including agents or sub-contractors, who assist us in providing information, products, services, or direct marketing to you
- third parties to collect and process data

We do not sell the names or other Personal Information of our customers. We do not disclose the names or other Personal Information of our customers to other companies outside of Eqraz without consent, unless required or permitted by law. Over time, we may buy new businesses or sell some of our businesses. Accordingly, Personal

Information associated with any accounts, products or services of the business being purchased or sold will be transferred as a business asset to the new business owner.

We may use affiliates or other companies to provide services on our behalf such as data processing, account administration, analytics and marketing. Such companies will be given only the Personal Information needed to perform those services and we do not authorize them to use or disclose Personal Information for their own marketing or other purposes. We have or will have contracts in place holding these companies to the same standards of confidentiality by which we are governed. By submitting your personal information or engaging with the Website, you consent to this transfer, storage, or processing.

## Additional Disclosure on Personal Information

**Verifying Information:** We may reach out to third parties to verify your Personal Information, this includes (but is not limited to):

- Credit bureaus such as Equifax and TransUnion
- Credit insurers
- Third party verification services including but not limited to AML and KYC background screening companies
- Registries
- Financial service industry databases
- Investigative bodies
- Your employer(s)
- Personal references you may or may not have

**Credit Consent:** If you avail any of our products and/or services we may use, obtain, verify, share and exchange your information with others (including but not limited to credit bureaus, Insurance companies, registries and other entities/individuals with whom you may have financial dealings, as well as any other person as may be permitted or required by law). Your information may be obtained at the time of your application, at any time during the application process and on an ongoing basis while you are a customer, for the purposes of evaluating your current and ongoing creditworthiness and maintaining your credit history. We may also share information with credit reporting agencies or credit bureaus relating to any products you have with us. This may include, but not be limited to, failure by you to meet any of your obligations under the applicable terms and conditions of those products.

**Insured Credit Product:** If you have availed a product with us which requires you to avail an insurance policy, we may share Personal Information about you, to insurers for any purpose related to the insurance e.g., in the event of default.

**Defaults:** If the credit facility you have with us or you have guaranteed is in default, we may release your Personal Information to collection agencies, the originating broker or any subsequent mortgagee, or other third parties as necessary for the purposes of assisting in collecting the debt. We will limit the amount and type of Personal

Information disclosed to that which is necessary to facilitate the collection of the arrears.

**Communications:** We may monitor and/or record any communications between you and our representatives (e.g., telephone discussions, email conversations, online chats) for accuracy, service quality, training and security purposes, our mutual protection and to enhance our customer service.

We may communicate with you through various channels including telephone, computer, mail or mobile applications or by other electronic means, using the contact information you have provided.

## International Transfers of Personal Information

The personal information we collect is stored and/or processed where we or our partners, affiliates, and third-party providers maintain facilities. Please be aware that the locations to which we store, process, or transfer your personal information may not have the same data protection laws as the country in which you initially provided the information. If we transfer your personal information to third parties in other countries: (i) we will perform those transfers in accordance with the requirements of applicable law; and (ii) we will protect the transferred personal information in accordance with this privacy policy. By submitting your personal information or engaging with the Website, you consent to this transfer, storage, or processing.

## Your Rights and Controlling Your Personal Information

You always retain the right to withhold personal information from us, with the understanding that your experience of our website and/or the product/service offering may be affected. We will not discriminate against you for exercising any of your rights over your personal information. If you do provide us with personal information, you understand that we will collect, hold, use, and disclose it in accordance with this privacy policy. You retain the right to request details of any personal information we hold about you.

If we receive personal information about you from a third party, we will protect it as set out in this privacy policy. If you are a third party providing personal information about somebody else, you represent and warrant that you have such person's consent to provide the personal information to us.

The website may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you. If you follow a link to a third-party website or engage a third-party plugin, please note that these third parties have their own privacy policies and we do not accept any responsibility or liability for these policies. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time. We will provide you with



the ability to unsubscribe from our email-database or opt out of communications. Please be aware we may need to request specific information from you to help us confirm your identity.

If you believe that any information, we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, please contact us using the details provided in this privacy policy. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading, or out of date.

If you believe that we have breached a relevant data protection law and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint. You also have the right to contact a regulatory body or data protection authority in relation to your complaint.

### Use of Cookies

We use "cookies" to collect information about you and your activity across our site. A cookie is a small piece of data that our website stores on your computer, and accesses each time you visit, so we can understand how you use our site. This helps us serve you content based on preferences you have specified.

### How to update your information

You will bear responsibility to inform Eqraz of any faults and/or updates to your Personal Information that may occur over time. You may be asked to verify your identity when providing your Personal Information

Subject to contractual and legal restrictions as well as reasonable notice, you may request access to or correction of the Personal Information we hold about you

### Contact Us

**For any questions or concerns regarding your privacy and/or your information you may contact our designated Privacy Officer using the following details:**

**Name:** Syed Zuhair Naqvi  
**Title:** Founder and CEO, Acting Privacy Officer  
**Email:** zuhair.naqvi@eqraz.com  
**Tel:** 1-888-55-EQRAZ (37729)

at any time by submitting a written request - contact details of our Privacy Officer are provided below.

If we are unable to provide you access to your Personal Information e.g., if we are legally obliged not to share – then we will provide you with a confirmation explaining why we are unable to provide you access.

We will act on your instructions as quickly as possible but it may take some time for our records to reflect your choice as many records can only be changed during file updates.

### Limits of Our Policy

Our website may link to external sites that are not operated by us. Please be aware that we have no control over the content and policies of those sites, and cannot accept responsibility or liability for their respective privacy practices.

### Changes to This Policy

At our discretion, we may change our privacy policy to reflect updates to our business processes, current acceptable practices, or legislative or regulatory changes. If we decide to change this privacy policy, we will post the changes here at the same link by which you are accessing this privacy policy.

If required by law, we will get your permission or give you the opportunity to opt in to or opt out of, as applicable, any new uses of your personal information.

### Canadian Anti-Spam Legislation

We are required to obtain your consent in order to send you email communications about our events, products and services. If you have any queries – please address them to the Privacy Officer (details noted below)