

PRIVACY POLICY

1. General

- 1.1. This privacy policy (the "**Privacy Policy**") governs the manner in which Influencers Group Inc., a legal entity incorporated under the laws of Canada and registered as a money services business (MSB) with the Financial Transactions and Reports Analysis Centre (FINTRAC) for the activities of foreign exchange dealing, money transferring and dealing in virtual currencies, MSB registration number is M22572034 ("**Company**", "**we**", "**us**", or "**our**"), collects, uses, processes, stores, and discloses information, the Company receives from the clients ("**clients**", "**you**", "**your**") or users of our website <https://influencersgroup.ca/en> ("**Website**") or that the Company otherwise collects when concluding Service Agreement and providing the clients with remittance services, currency exchange services and virtual currencies exchange/transfer services (the "**Services**"). Such information may include personal data of the clients, personal data of the officers and contact persons, if the client is a legal entity, personal data of clients' payment recipients ("**Personal Data**"), and information, associated with client's activities (Account operations, Payment Instructions etc.), using the Services (together with Personal Data – "**Data**").
- 1.2. This Privacy Policy has incorporated provisions of The Personal Information Protection and Electronic Documents Act (PIPEDA) and other data protection laws and regulations.
- 1.3. We respect the privacy of all our clients and users of the Website. The clients' and users' Data is treated confidentially and in compliance with applicable laws and regulations.
- 1.4. We comply with [Google API Services User Data Policy](#) including the Limited Use requirements.
- 1.5. We collect and process Data to provide our Services to you, identify you, and ensure the security of our Services.
- 1.6. This Privacy Policy applies to the Website and the Services.
- 1.7. By using the Website, the Services or concluding Service Agreement you express your consent to the terms of this Privacy Policy.
- 1.8. This Privacy Policy is published at the Website and is an integral part of Service Agreement you conclude.
- 1.9. If you have any questions regarding this Privacy Policy or your Data, please contact us at info@ig.io.

2. Data collection and use

- 2.1. We collect the following Data:
 - 2.1.1. Data that a client provides us for concluding Service Agreement and using the Services, including:
 - 2.1.1.1. client's name, address, e-mail address, telephone number, instant messenger, Web Portal, contact details;
 - 2.1.1.2. client's identification details;
 - 2.1.1.3. bank / payment system / exchange details.

- 2.1.2. Know Your Client (KYC) Data from you, third parties, or publicly available sources, including:
 - 2.1.2.1. passport or registration certificate, tax certificate, corporate documents (if the client is a legal entity) or other identity documents;
 - 2.1.2.2. client's photo (officials' or contact persons' photos);
 - 2.1.2.3. documents establishing your source of funds / virtual currency;
- 2.1.3. Data received for AML/CFT (Anti-Money Laundering / Countering The Financing Of Terrorism).
 - 2.1.3.1. results of KYC or Politically Exposed Person (PEP) checks, including information collected by our service suppliers.
- 2.1.4. Data relating to your use of our Services, including:
 - 2.1.4.1. your requests and Payment Instructions;
 - 2.1.4.2. your Account operations using the Services;
 - 2.1.4.3. your payment recipients' identification and bank / payment system / exchange details.
- 2.1.5. Data in your correspondence with us by e-mail, telephone, messaging, online chats, social media, Web Portal or otherwise, including:
 - 2.1.5.1. whether you have clicked on links in electronic communications from us, such as the URL clickstream to our Website;
 - 2.1.5.2. Data that you provide in response to our surveys.
- 2.1.6. Data that we collect from third parties to conclude Service Agreement with you or provide you with Services:
 - 2.1.6.1. Data related to payments to or from your accounts provided by payment processing services, banks, payment systems, exchanges and other financial service firms;
 - 2.1.6.2. Personal Data from credit reference agencies or fraud prevention agencies.
- 2.1.7. Data that we collect through your use of our Website, including:
 - 2.1.7.1. device information;
 - 2.1.7.2. hardware and browser settings;
 - 2.1.7.3. date and time of visits;
 - 2.1.7.4. the pages you visit, the length of the visit, your interactions with the page, methods to browse away from our Website, and search engine terms you use;
 - 2.1.7.5. IP address.

2.2. We may use your Data as follows:

- 2.2.1. We may use Data that you provide to conclude Service Agreement and use Services to:
 - 2.2.1.1. process your request to conclude Service Agreement;
 - 2.2.1.2. on-board you as a client;
 - 2.2.1.3. provide our Services;

- 2.2.1.4. manage and administer our Services;
 - 2.2.1.5. administer the Account;
 - 2.2.1.6. communicate with you about the Account operations, Payment Instructions and our Services;
 - 2.2.1.7. send personalized offers of Services.
- 2.2.2. We may use Know Your Client (KYC) Data to:
 - 2.2.2.1. carry out regulatory checks and meet our obligations to our regulators;
 - 2.2.2.2. help us ensure that our clients are genuine and to prevent and detect crime, such as fraud, money laundering, terrorist financing, and other offenses, including those involving identity theft.
- 2.2.3. We may use Data relating to your use of our Services to:
 - 2.2.3.1. manage and administer our Services;
 - 2.2.3.2. check if your Payment Instruction is authorized, sent from your e-mail address / Web Portal, indicated in the Service Agreement, and meets all other requirements in order to help prevent fraud;
 - 2.2.3.3. improve our Services based on analyzing Data and the behaviors of the clients;
 - 2.2.3.4. ensure effective communication with clients and train our personnel.
- 2.2.4. We may use Data that we collect from third parties to:
 - 2.2.4.1. conclude Service Agreement with you as our client;
 - 2.2.4.2. provide Services to you;
 - 2.2.4.3. manage and administer our Services;
 - 2.2.4.4. prevent and detect fraud.
- 2.2.5. We may use Data that we collect through your use of our Website to:
 - 2.2.5.1. improve Services;
 - 2.2.5.2. identify and eliminate issues with our Website;
 - 2.2.5.3. monitor the way our Website is used in order to determine the locations it is accessed from, devices it is accessed from, places where our clients have come from online (e.g., links on other websites or advertising banners); and to understand and analyze peak usage times, the functionality and information that are the most and least accessed, the structure of our clients, the ways that our Website is used by different groups of users, and what attracts our clients to our Services.

3. Rights of the Personal Data subject

- 3.1. The client (his officers and contact persons, if the client is a legal entity) has the following rights with respect to his Personal Data:

- 3.1.1. Right to be informed – You have the right to be informed about the collection and use of your Personal Data and the following information: who has collected and processed Personal Data; the purposes for processing your Personal Data; retention periods for Personal Data; and who Personal Data will be shared with, etc.
- 3.1.2. Right to access – You have the right to obtain confirmation from us as to whether or not your Personal Data is being processed, the purposes of the processing, the categories of Personal Data collected, the recipients to whom the Personal Data has been or will be disclosed, etc.
- 3.1.3. Right to rectification – You have the right to obtain from us rectification of inaccurate Personal Data concerning you as well as the right to have incomplete Personal Data completed.
- 3.1.4. Right to erasure (“right to be forgotten”) – You have the right to ask for the deletion of your Personal Data if the Personal Data is no longer necessary in relation to the purposes for which it was collected or otherwise processed or if there is no other legal ground for the processing.
- 3.1.5. Right to restriction of processing – You have the right to ask us to restrict further processing of your Personal Data, so that in each case the data may be processed only with separate consent from you or as otherwise provided by data protection laws.
- 3.1.6. Right to data portability – You have the right to receive your Personal Data in a structured, commonly used, and machine-readable format and the right to transmit that data to another controller where technically feasible.
- 3.1.7. Right to object – You have the right to object at any time, on grounds relating to your particular situation, to the processing of your Personal Data if there are no legitimate grounds for processing it which override your interests, rights, and freedoms or for the establishment, exercise, or defense of legal claims.
- 3.1.8. Right to withdraw – You can withdraw your consent to your Personal Data being processed if you believe that we do not have the proper rights to do so.
- 3.2. To exercise your rights, please contact us at info@iq.io.

4. Direct marketing

- 4.1. Please note that if you have given explicit consent to marketing communications, this can be withdrawn at any time. You can also unsubscribe from our marketing communications.
- 4.2. Please be aware that from time to time we may need to contact you regarding Payment Instructions, Account operations, fulfillment of Service Agreement and the Services provided.

5. Legal requirements

- 5.1. We need to collect certain types of Personal Data to comply with legal requirements relating to our anti-fraud, anti-money-laundering, counter-terrorist financing, and Know Your Client obligations. If this Personal Data is not provided, we cannot provide our Services to you.

- 5.2. Your Personal Data may also be processed if it is necessary on reasonable request by a law enforcement or regulatory authority, body, or agency or in the defense of a legal claim. We will not delete Personal Data if relevant to an investigation or dispute. It will continue to be stored until the investigation is complete or the dispute is fully resolved.

6. Personal Data we do not process

- 6.1. We do not collect or store any information about children under 18. Minors and children should not use our Services. By using our Services, you represent that you have the legal capacity to enter into a binding agreement.
- 6.2. We do not process any sensitive personal information, such as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, or data concerning a natural person's sex life or sexual orientation.

7. Security of Data

- 7.1. We use a variety of physical, technical, and administrative security measures to ensure the confidentiality of your Data and protect your Data from loss, theft, unauthorized access, misuse, alteration, or destruction, as well as from other illegal actions of third parties.
- 7.2. We implement security measures such as data encryption when in transit and storage, data storage diversification, strict physical access controls to buildings and files, anonymization technology, asset diversification, strict physical access by a minimal number of individuals, using multisign access tools, and compliance with confidentiality commitments.
- 7.3. We make sure that we regularly review our information security policies and measures and, where necessary, improve them.

8. Sharing your Data

- 8.1. We do not sell, trade, or rent our clients' Data to any third parties. We may transfer certain Data (such as your contact and/or identification information, bank or payment system or exchange details, your payment recipient's bank or payment system or exchange details, Account operations) to the bank / payment system / exchange, where the Account is opened, and also to third-party financial institutions (e.g., FINTRAC) in exceptional cases, when required by the rules and policies of such financial institutions, in order to identify clients and provide them with our Services.
- 8.2. Clients acknowledge and consent that we can transfer their Data to third parties that carry out KYC checks and fraud database checks, credit reference agencies. Such third parties guarantee compliance with legislation on the processing of personal data.

9. Retention of Data

- 9.1. We retain your Data only for those periods necessary to fulfill the various purposes outlined in this Privacy Policy unless a longer retention period is required or allowed by law.
- 9.2. For the purposes of complying with our legal obligations and the world industry standards for Data storage, you give us consent and permission to keep records of

such information throughout the term of your Service Agreement as well as for five (5) years after the termination of your Service Agreement.

- 9.3. We may store your Data for longer than is required by law as long as it is in our legitimate business interests and is not prohibited by law.

10. Data disclosure

- 10.1. We may disclose some of your Data to our partners (such as banks, payment systems, exchanges etc.) who provide services to us or work with us to deliver our Services to the clients. We provide third parties with the minimum amount of Data necessary only to perform the required service.
- 10.2. We will disclose Data only to provide our clients with Services, fulfill the Service Agreement, improve the Services and related communications. Such information will not be provided to third parties for their marketing purposes.
- 10.3. We may disclose your Data in accordance with the law or court order, in court proceedings, and/or based on requests from government authorities in or outside the territory of your country of residence. We may also disclose your Data if we determine that such disclosure is necessary or appropriate for national security and/or law enforcement.
- 10.4. We may also disclose your Data if we determine that the disclosure is necessary to enforce the Service Agreement or protect our activities and our clients.

11. Data transfers

- 11.1. We may transfer to, and store your Data we collect in countries other than the country in which the Data was originally collected. Those countries may not have the same data protection laws as the country in which you provided the Data. When we transfer your Data to other countries, we will protect the data as described in this Privacy Policy and comply with applicable legal requirements providing adequate protection for the transfer of Data to other countries.

12. Cookies

- 12.1. Cookies are text files placed on your computer to collect standard internet log information and visitor behavior information. When you visit our Website, we may automatically collect information about you using cookies or similar technology. For more information on cookies, you may visit www.allaboutcookies.org.
- 12.2. We use cookies in a variety of ways to improve your experience with our Website, including:
 - 12.2.1. enabling you to stay logged in;
 - 12.2.2. understanding how you use our Website;
 - 12.2.3. analyze the behavior and interests of the Website visitors.
- 12.3. We also use the data we receive from the cookies on our Website to generate reports. We analyze the reports in detail, make changes to the operation of the Website in order to improve the client and user experience.
- 12.4. There are several different types of cookies, however, the Website uses:

- 12.4.1. Functional - we use these cookies so that we can recognize you on our Website and save your previously selected settings, which may include the language you prefer and your location.
 - 12.4.2. Advertising - we use these cookies to collect information about your visits to the Website, the content viewed, the links you followed, as well as information about your browser, device, and your IP address.
- 12.5. We may sometimes transfer some of this data to third parties for advertising purposes. We may also transfer data collected through cookies to newsletter service providers. This means that when you visit another Website, you may be shown advertisements based on your views on our Website.
- 12.6. You can set your browser so that it does not accept cookies, and here - www.allaboutcookies.org, you will learn how to delete cookies from your browser. However, in such cases, some Website features may not work.
- 12.7. We use Google Analytics, which is a web analytics tool that helps us understand how users engage with our Website. Like many services, Google Analytics uses first-party cookies to track user interactions, as in our case, where they are used to collect information about how users use our Website. This information is used to compile reports and to help us improve our Website. These reports disclose Website trends without identifying individual visitors.

13. Changes to the Privacy Policy

- 13.1. We reserve the right to amend the Privacy Policy at our discretion and at any time.
- 13.2. Any changes to this Privacy Policy will take effect from the moment it is published on the Website unless otherwise stipulated herein.
- 13.3. You shall regularly review the Privacy Policy and pay attention to its revisions.
- 13.4. Your continued use of our Website and Services following the posting of changes constitutes your acceptance of the amended Privacy Policy.
- 13.5. This Privacy Policy was last amended on 28 February 2024.