

# First Global Data Corp.

## Privacy Policy

As of February 23, 2015

Doing business with First Global Data Corp. ("**First Global**", "**First Global Money**", "**we**" or "**us**", which includes First Global Data Corp.'s subsidiary, First Global Money Inc. and their respective directors, officers, employees, consultants, affiliates and assignees) and using the "**First Global Website**" (which term includes [www.firstglobalmoney.com](http://www.firstglobalmoney.com) and any and all First Global branded URLs which may be used by us from time to time and all components thereof) involves providing information about yourself. We take your privacy very seriously – and you have control over how your information is collected, used and disclosed by us.

We also recognize that the growth of on-line services, including Internet services, has created additional privacy concerns, particularly for consumers. First Global maintains strict privacy policies in an effort to safeguard personally identifiable information ("**PII**") and communications from unauthorized intrusions. Online privacy concerns focus primarily on the protection of PII which an individual or other customer reasonably expects to be kept private. As the term suggests, PII is information that, when associated with an individual identifies that individual, for example, a customer's name, address, telephone number, e-mail address or credit card number.

Through the First Global Website (which term includes [www.firstglobalmoney.com](http://www.firstglobalmoney.com) and any and all First Global branded URLs), Users can, among other things, send money to others. For the purposes of this Terms of Use Agreement, the services offered by First Global include the First Global Website (and all components thereof) and all goods and services offered now or in the future by First Global on or through the First Global Website, including but not limited to moneys transfers (collectively, the "**Services**").

The following is First Global's privacy policy (this "**Privacy Policy**"), which forms part of the First Global Terms of Use Agreement (the "**Terms of Use Agreement**") and is an integral part thereof. By using the Services (including but not limited to browsing the First Global Website and/or registering with First Global as a Member), you agree to be bound by this Privacy Policy and the First Global Terms of Use Agreement.

*Terms not otherwise defined in this Privacy Policy have the meanings ascribed to them in the [First Global Terms of Use Agreement](#).*

### What this Privacy Policy Covers

- This Privacy Policy covers First Global's treatment of the information we collect when you visit the First Global Website and/or when you use the Services.
- This Privacy Policy does not apply to the practices of companies that First Global does not own or control or to people that First Global does not employ or manage, including without limitation, any of First Global's affiliates and business partners.

### **Information Collection and Use**

- When you create a Member Account and/or otherwise use the Services, we require certain information, including but not necessarily limited to your name, phone number and email address.
- We may automatically receive and record non-PII (i.e. information that does not identify you personally) on the First Global Website server logs from your browser, including your IP address, cookie information and the page you requested. (User IP addresses may be recorded for security and monitoring purposes.)
- We may use information for the following general purposes:
  - to fulfill your requests for certain services, information and/or materials; and
  - to protect you, First Global and/or other Users from error, fraud and unauthorized access to and/or use of the Services.
- To help fight the funding of terrorism and money laundering activities, Canadian law requires that we obtain, verify, and record information about Users. We may collect PII for that purpose from you from time to time.
- You authorize First Global, directly and/or through third parties, to make any inquiries we consider reasonable and/or necessary to validate the information that you provide to us. This may include asking you for additional information, requiring you to take steps to confirm ownership of your email address or financial instruments, verifying your information against third party databases and/or through other sources.
- In addition to the foregoing, from time to time we may be required to collect information as may be required by law. For example, Canadian Users are directed to the Financial Transactions and Reports Analysis Centre of Canada's website for information concerning Canadian requirements.

### **Information Sharing and Disclosure by First Global**

- First Global will not share PII about you to other companies or persons except when:
  - we have your consent to share the information;
  - we need to share the information with individuals and/or companies who work with and/or on behalf of First Global to provide services to you that you have requested;
  - we reasonably believe it is necessary to share PII:
    - to investigate, prevent or take action regarding potentially illegal activity or activity that threatens the network or otherwise violates the First Global Terms of Use Agreement,
    - to investigate, prevent or take action regarding situations involving potential threats to the physical safety of any person, or
    - for risk management purposes;
  - we are required to disclose PII by reasons of a court order, subpoena, search warrant, or other legal process or in the case of imminent physical harm to the customer or others, or

- to establish or exercise First Global's legal rights or defend against legal claims.

### **Cookies and Usage Data**

- When you access the Internet, the computers that host websites you visit ("**web servers**") automatically receive some anonymous information. This "**usage data**" may include a record of which pages a web browser has visited. The First Global Website's servers receive usage data when users visit the Website and possibly when users visit other sites as well. First Global and its advertisers may use various kinds of software devices to collect information about Internet use.
- First Global may use cookies and other tools to customize the content and advertising you receive based on the information you provide to First Global. The information used for this feature does not provide your PII or identify you as an individual to third parties, but will involve the processing of certain related data such as IP addresses.
- Small files called "**cookies**" may be attached to your Web browser and your computer. You may be able to configure your browser to accept or block all or some cookies, or notify you when a cookie is set. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences. *Note: Disabling cookies may mean that we won't be able provide certain services, which may be of use to you.*
- First Global may also use "**web beacons**" to access First Global's cookies inside and outside the First Global Website and in connection with the Services.

### **Links & Third Party Applications**

- First Global may provide, and the First Global Website may contain links to other websites. Although we strive to only link to websites that share First Global's high standards and respect for privacy, we are not responsible for the content or practices employed by other websites or parties.
- Third party applications (such as widgets) created by third party developers may also be available on the First Global Website. Third party applications are small bits of software, often with interactivity, that can be installed into profiles or shared with other Users. First Global does not control third party developers and cannot dictate their actions. When you engage with a third party application, you are interacting with the third party developer, not with First Global. We strongly encourage you to not provide PII to any third party unless you know the third party with whom you are interacting.
- If you go to another web site, including an advertiser's web site (for example by clicking on an advertisement), or request information or enter a contest, be aware that you may be authorizing another company, including an advertising company, to use information you supply. **An advertiser's collection and use of information is subject to its own privacy policies, not this one.**
- When you leave an First Global Website via a link, access a third party application (such as a widget) or click on an advertisement, you should check the applicable privacy policy of the third party or advertiser to determine, among other things, how they will handle any PII they collect from you.

### Editing and Deleting Information

- You have the right to access, verify and update your PII at any time, including whether you want First Global to contact you about specials and new services. You may modify or remove any of your PII (except for your name) at any time by emailing us at [customerservice@firstglobalmoney.com](mailto:customerservice@firstglobalmoney.com)
- First Global honours requests from users to review all PII maintained in reasonably retrievable form, and will correct any such information which may be inaccurate. You may also verify that appropriate corrections have been made.

### Confidentiality and Security

- We have safeguards to protect your PII and we use commercially reasonable measures to safeguard PII in First Global's possession against loss, theft and unauthorized use, disclosure or modification. For example:
  - First Global Money is secured by third party SSL Certificate, which means all PII and financial information is encrypted before being transmitted through the Internet.
  - Information input in the First Global Website is also encrypted and secured with Third Party SSL Certificate.
  - In order to protect against the loss, misuse and alteration of the information under First Global's control, First Global's database resides behind firewalls.
  - The physical server where your data is stored is protected physically and electronically.
  - We maintain a replication of your data, which is stored in a server in a different location than our main server, also protected physically and electronically.
  - We periodically audit our security policy for ensuring the protection of your information.
- First Global uses reasonable methods to make sure that PII is accurate, up-to-date and appropriately complete.
- We limit access to PII about you to people who, as part of their job, we believe need to come into contact with that information to provide services to you.
- Despite First Global's high standards, no claim is made as to the impenetrability of the system under unusual circumstances or its resilience to future attacks.
- We work with major banks and trusted retailers worldwide to transfer your money directly to the Recipient's bank account(s) and/or facilitate cash pick up at retailers and bank branches.
- **In the event that you believe that your personal safety is at risk or if you believe that you may be the victim of identity theft or other illegal conduct, please contact the appropriate federal, provincial or local law enforcement agencies directly.**

### Changes to this Privacy Policy

- First Global will keep this Privacy Policy current and as such may amend this Privacy Policy from time to time.
- First Global will inform you of any changes we make by sending a notice to you via email and/or by posting an announcement on the First Global Websites (as applicable).

### Questions / Suggestions / Concerns

- If you have questions, concerns or suggestions about First Global, the First Global Website or any First Global services, please feel free to email us at [customerservice@firstglobalmoney.com](mailto:customerservice@firstglobalmoney.com)
- If you have questions, concerns or suggestions about this Privacy Policy or its implementation, please email us at [customerservice@firstglobalmoney.com](mailto:customerservice@firstglobalmoney.com).
- If you notice any unauthorized activity in your Member Account, please immediately call our toll free number +1(877) 793-7171 or email us at [customerservice@firstglobalmoney.com](mailto:customerservice@firstglobalmoney.com). We will take action to secure your Member Account and conduct an investigation and if it is determined that your Username or password was stolen resulting in an unauthorized use of your Member Account we will refund you the full amount of the unauthorized Transaction.

**DO NOT BE MISLED BY EMAILS THAT APPEAR TO BE FROM US AND ASK YOU'RE YOUR PERSONAL INFORMATION. IF YOU RECEIVE A SUSPICIOUS EMAIL REQUESTING YOUR PERSONAL INFORMATION, PLEASE FORWARD THE EMAIL IMMEDIATELY TO [CUSTOMERSERVICE@FIRSTGLOBALMONEY.COM](mailto:CUSTOMERSERVICE@FIRSTGLOBALMONEY.COM) SO THAT WE CAN INVESTIGATE THE EMAIL AND, IF NECESSARY, PROVIDE A SECURITY ALERT TO OUR USERS.**

**PLEASE DO NOT SEND CONFIDENTIAL PERSONALLY IDENTIFIABLE INFORMATION SUCH AS PASSPORT NUMBERS, GOVERNMENT IDENTIFICATION NUMBERS, OR ACCOUNT NUMBERS TO FIRST GLOBAL VIA AN UNSECURED EMAIL MESSAGE. YOU MAY SEND CONFIDENTIAL PERSONALLY IDENTIFIABLE INFORMATION TO FIRST GLOBAL VIA POSTED MAIL, PHONE OR USE THE "CONTACT US" LINK AVAILABLE ON OUR WEBSITE.**