



## **Plutu Privacy Policy (Last Updated: May 18, 2025)**

### **1 / Consent to the Collection, Use, and Disclosure of Personal Information**

By submitting your personal information to Plutu, you hereby consent to its collection, use, disclosure, and retention in accordance with this Privacy Policy and as otherwise permitted by applicable law. You may revoke your consent at any time, subject to legal or contractual limitations and upon providing reasonable notice to Plutu. However, such withdrawal may affect your ability to engage in certain interactions or transactions with Plutu or to fully access and benefit from its products and services.

### **2/ Definition and Scope of Personal Information**

For the purposes of this Privacy Policy, “personal information” refers to information relating to an identifiable individual, including, for example, the individual’s name and email address. This definition does not extend to information that is publicly available, such as listings in a telephone directory, or to business contact information that permits an individual to be reached at their place of employment, to the extent permitted by applicable law.

### **3/ Categories of Personal Information Collected by Plutu**

#### **(a) Information Voluntarily Submitted by the Individual**

You may be requested to voluntarily provide your personal information to Plutu during your interactions with the company—whether orally, in writing, or through electronic

communication—including, but not limited to, when you apply for an account, subscribe to a newsletter, register to receive information, or request, register for, or utilize a product or service offered by Plutu. In such cases, you may decline to provide certain requested personal information; however, doing so may limit your ability to complete the intended interaction or transaction with Plutu, or to fully access or benefit from the requested product or service. Telephone communications between you and Plutu may be recorded for the purposes of accuracy and quality assurance. These recordings may be disclosed to third parties as necessary to confirm Plutu's compliance with its contractual obligations. You may opt out of having a telephone conversation recorded by choosing to communicate with Plutu in writing or through electronic means.

#### (b) Information Collected Through Automated Means

Plutu Company may automatically collect certain information relating to your use of its website or online services. This may include, without limitation, the dates and times of access, the browsers, operating systems, software, and devices used, as well as specific details regarding your interactions with the website or services.

Plutu's websites, online services, email communications, and advertisements may employ various technologies—such as cookies, web beacons, tokens, session recordings, pixels, or tags—to collect data that supports the enhancement of its products, services, customer communications, and advertising, as well as to assist in the prevention of fraud. Information collected through such technologies may be used to recognize you as a returning user, to improve and personalize your experience, to verify message delivery and engagement, and to present you with tailored advertising. You may, if supported by your web browser or device, choose to refuse or disable cookies; however, doing so may restrict your ability to use certain features of the website or online services. Additional information regarding the use of cookies for interest-based advertising is provided in section 4(c) of this Privacy Policy.

Much of the data collected through technological means constitutes non-personal information, as it does not identify you individually. Plutu will handle such non-personal information in accordance with the terms of this Privacy Policy, except where otherwise required by applicable law.

#### (c) Disclosure of Personal Information in Connection with Referred Third-Party Transactions

If Plutu refers you to an independent business (e.g. a lender, supplier, wholesale company) for a proposed transaction (e.g. a personal loan, product purchase, financing), then Plutu may collect from that independent business information regarding the transaction to update your confidential profile for use by Plutu as set out in this Privacy Policy.

#### 4/ Use of Personal Information by Plutu

##### (a) General Purposes of Use

Plutu utilizes the personal information it collects from you for purposes related to, or arising from, your relationship and transactions with Plutu, as outlined in this Privacy Policy and as otherwise permitted by applicable law. These purposes include, but are not limited to:

Administering your relationship with Plutu, including the creation and management of your account, and communicating with you in connection with such matters;

Facilitating your interactions and transactions with Plutu, including processing applications, requests, orders, and payments;

Providing you with products and services;

Responding to your inquiries, requests, and other communications;

Sending you information, including via email and other electronic means, about Plutu and its products and services, as well as related offerings from third parties, where permitted by applicable law;

Administering and facilitating your participation in contests, promotions, and similar initiatives related to Plutu;

Maintaining, safeguarding, and enhancing Plutu's products and services, and developing new offerings;

Protecting and enforcing Plutu's legal rights, interests, and available remedies, and safeguarding the business, operations, customers, and other stakeholders of Plutu; and

Enabling other Plutu Companies to collect, use, disclose, and retain your personal information in accordance with this Privacy Policy.

#### (b) Disclosure of Personal Information by Plutu

Plutu may disclose your personal information to other Plutu Companies and may create, maintain, and share a confidential profile about you. This profile may be used by each Plutu Company to provide you with information, products, and services, to facilitate your interactions and transactions with them, and for other purposes as outlined in this Privacy Policy.

#### (c) Use of Personal Information for Interest-Based Advertising

Plutu may utilize interest-based advertising services—also referred to as “remarketing” or “retargeting”—provided by third-party vendors, such as Google and Facebook, to display advertisements on external websites and social media platforms visited by users of Plutu's website. These advertising vendors employ technologies such as cookies, pixels, or tokens—unique identifiers associated with a specific web browser on a particular device, which are installed when the device accesses Plutu's website—to deliver advertisements based on the user's previous visits to the site. You may opt out of Google's use of cookies by adjusting your preferences through Google's Ads Settings. Additionally, you may opt out of remarketing services provided by other vendors by visiting the Network Advertising Initiative's consumer opt-out page.

## 5/ Disclosure of Personal Information by Plutu

### (a) General Disclosures

Plutu discloses your personal information for purposes relating to or arising from your relationship and transactions with Plutu and as otherwise set out in this Privacy Policy or permitted by applicable law.

### (b) Disclosures Pursuant to Specific Consent

Plutu may disclose your personal information in accordance with express or implied consents that you give during your interactions and transactions with Plutu.

### (c) Disclosures Relating to Referred Third-Party Transactions

If Plutu refers you to an independent business (e.g. a lender, supplier, wholesale company) for a proposed transaction (e.g. a personal loan, product purchase, financing), then Plutu may disclose your personal information—including any estimated credit score you have provided, bank account details, and related information—to that independent business in order to facilitate the transaction. Plutu assumes no responsibility or liability for the use, disclosure, or retention of your personal information by the independent business. The handling of your information by such third parties is not governed by this Privacy Policy.

### (d) Disclosures to Suppliers and Service Providers

Plutu may disclose your personal information to its suppliers and service providers—including, but not limited to, fraud prevention services and payment processors—for the purposes of assisting Plutu in delivering products, services, and information to you; providing services to Plutu; or facilitating the use of your personal information in accordance with this Privacy Policy and applicable law.

#### (e) Disclosures for Law Enforcement and Legal Compliance

Plutu may disclose your personal information where required or authorized by applicable law, including in response to subpoenas, warrants, court or arbitral orders, or other legal disclosure obligations. Plutu may also disclose your personal information to law enforcement agencies or other independent entities if it reasonably believes that such disclosure is necessary or appropriate for national security, law enforcement purposes, or other matters of public significance. Additionally, disclosure may occur where Plutu believes it is necessary to protect or enforce its legal rights, interests, or remedies, or to safeguard the rights, interests, operations, customers, or property of Plutu or others—including for the detection and prevention of fraud or other unlawful activities, and for the enforcement of any applicable terms of service or related agreements. Plutu assumes no responsibility or liability for the use, disclosure, or retention of your personal information by these agencies, organizations, or individuals. The handling of such disclosed information by third parties is not subject to this Privacy Policy.

#### (f) Disclosures in Connection with Business Transactions

Plutu may disclose your personal information in connection with a proposed or actual business transaction involving Plutu, such as a corporate amalgamation, reorganization, merger, acquisition, or the sale or transfer of some or all of its business or assets. In such cases, Plutu will require the receiving party to commit to protecting your personal information in a manner consistent with this Privacy Policy and in compliance with applicable law.

### 6 / Retention and Disposal of Personal Information

Plutu retains your personal information for as long as is reasonably necessary to fulfill the purposes outlined or referenced in this Privacy Policy, to comply with legal obligations, and to enforce or protect Plutu's legal rights. Personal information may be retained for a longer period if required or permitted by applicable law. Once retention is no longer reasonably necessary for these purposes, Plutu will securely delete or otherwise dispose of the information.

## 7 / Safeguards and Security Measures for the Protection of Personal Information

Plutu employs reasonable safeguards—including administrative, physical, and technical measures—appropriate to the sensitivity of the personal information in its custody or control, in order to protect such information against unauthorized access, collection, use, disclosure, disposal, or other similar risks. However, it is important to acknowledge that no method of information security is entirely infallible. Consequently, Plutu cannot guarantee that your personal information will never be accessed, disclosed, or otherwise compromised in a manner inconsistent with this Privacy Policy.

## 8 / Cross-Border Transfer and Storage of Personal Information

Plutu, its affiliated companies ("Plutu Companies"), and their respective service providers may process, store, and utilize your personal information at facilities located in various jurisdictions, including, but not limited to, Canada, the United States, and one or more countries in Europe or Asia. The data protection laws in these jurisdictions may differ from those in your place of residence and may permit courts, government authorities, law enforcement agencies, regulatory bodies, or national security agencies to access your personal information without prior notice. By providing your personal information to Plutu, you consent to its transfer to, and processing and storage at, facilities located outside your home jurisdiction.

## 9/ Accuracy, Access and Deletion of Personal Information

### (a) Accuracy of Personal Information

Plutu relies on you to ensure that the personal information you provide is accurate, complete, and current to the extent required for the purposes for which it is used. You are expected to promptly notify Plutu of any changes to your personal information, either through the procedures provided by Plutu for that purpose or by contacting Plutu's customer service department directly.

## (b) Right of Access to Personal Information

You may submit a written request to Plutu's Privacy Officer to obtain reasonable access to your personal information held by Plutu, as well as information regarding the use, disclosure, and retention of that information. Subject to any applicable legal exceptions or limitations, you will be granted reasonable access to your personal information, and you will have the opportunity to verify its accuracy and completeness and to request corrections where appropriate. A reasonable fee may be charged for providing access to your personal information, in accordance with applicable law.

## (c) Request for Deletion of Personal Information

You may request the deletion of your personal information held by Plutu by submitting a written request to Plutu's Privacy Officer using the contact details provided below. Plutu will comply with such requests, subject to any applicable legal exceptions or limitations.

Plutu will undertake appropriate measures to verify the identity of any individual requesting access to, modification of, or deletion of their personal information. Plutu reserves the right to decline requests that are unreasonably repetitive, frivolous, vexatious, or impracticable; that could compromise the privacy of others; or that are otherwise not required to be fulfilled under applicable law.

## 10 / Non-Personal Information and Aggregated Data

Plutu generates and collects non-personal information—meaning information that does not pertain to an identifiable individual—including personal information that has been aggregated or otherwise anonymized to the extent that it no longer identifies any individual. Plutu may use, disclose, transfer, and retain such non-personal information for any purpose and in any manner it deems appropriate. In instances where non-personal information is combined with personal information, Plutu will treat the combined information as personal information in accordance with this Privacy Policy, for as long as the data remains combined.

## 11 / Third-Party Websites, Services, and Business Relationships

Plutu's website and communications (including emails and messages) may contain advertisements for products and services offered by independent third-party businesses—some of which may have a financial relationship with Plutu—as well as links to websites operated by such entities (e.g., lenders, credit card issuers, insurance providers). Plutu assumes no responsibility or liability for these external websites, services, or businesses, their products or services, or their collection, use, disclosure, or retention of your personal information. This Privacy Policy does not govern the personal information practices of those websites, services, or independent businesses. For inquiries regarding how such entities collect, use, disclose, or retain personal information, you should contact the relevant business or website operator directly.

## 12 / Miscellaneous Provisions

### (a) Disclaimers, Limitations of Liability, and Dispute Resolution

The agreements you enter into when applying for, registering for, ordering, or using Plutu's products or services—including any applicable subscription agreements or terms of service—contain important provisions. These include disclaimers and limitations or exclusions of liability applicable to Plutu and related parties (including Plutu Companies and third-party service providers), as well as provisions governing applicable law and jurisdiction for the resolution of disputes. To the extent permitted by applicable law, all such provisions shall apply equally to any dispute arising in connection with this Privacy Policy or with Plutu's collection, use, disclosure, or retention of personal information, and shall have the same legal effect as if expressly set out herein. This Privacy Policy does not amend or modify the terms of any other agreements between you and Plutu.

#### (b) Amendments to This Privacy Policy

Plutu reserves the right to amend this Privacy Policy at any time by posting an updated version on its website. The collection, use, disclosure, and retention of your personal information will be governed by the version of the Privacy Policy in effect at the time of such activities. Your continued engagement with Plutu following any amendments to the Privacy Policy will constitute your acceptance of the updated terms. Accordingly, you are encouraged to review the “Last Updated” date at the beginning of this Privacy Policy and to familiarize yourself with any changes since the last version.

#### (c) Language of the Policy

You and Plutu have each expressly requested and agreed that this Privacy Policy, along with all related documents, be drafted in the English language. Les parties conviennent et exigent expressément que cette Politique de Confidentialité ainsi que tous les documents s’y rapportant soient rédigés en anglais.

#### (d) Definition – “Plutu Companies”

For the purposes of this Privacy Policy, the term “Plutu Companies” collectively refers to Plutu’s parent company and affiliated corporate entities. Each such entity may be individually referred to as a “Plutu Company.”

#### (e) Contacting the Privacy Officer

If you have any questions or comments regarding this Privacy Policy or Plutu’s handling of your personal information, you are encouraged to contact Plutu’s Privacy Officer by email at: [info@plutu.ca](mailto:info@plutu.ca)

