

PRIVACY STATEMENT FOR WHISTLEBLOWING SERVICE AT MOGO FINANCE S.A.

1. INTRODUCTION

Mogo Finance S.A. and any of its affiliates ("Mogo") are committed to protecting your personal data in accordance with applicable data protection and privacy laws. By means of this whistleblowing online service any misconduct / improper activity / illegal activity within or in relation to Mogo can be reported, investigated and recorded. The purpose of this Privacy Statement is to explain how and why Mogo Finance S.A. ("Mogo Finance") collects, stores, uses, manages and otherwise processes your personal data in relation to this Mogo's online whistleblowing service.

2. CONTROLLER OF PERSONAL DATA

Mogo Finance is the controller of your personal data and determines the purposes and means for such data processing in the context of the online whistleblowing service.

3. PROCESSING OF PERSONAL DATA

This Mogo Finance's online whistleblowing service enables you (as Mogo employee, customer, supplier, partner, investor, agent and other external stakeholder) to alert Mogo Finance on the fact or suspicion of any misconduct / improper activity / illegal activity within or in relation to Mogo. You can submit the report anonymously without entering any personal data, but you may identify yourself. Mogo Finance will only process your personal data if you will identify yourself in your whistleblower's report.

4. PURPOSE FOR PERSONAL DATA PROCESSING

If you choose to submit your personal data, your personal data in the online whistleblowing service may be stored, used and otherwise processed by Mogo Finance for the purpose of investigating your alert:

- because it is necessary to comply with a legal obligation, given the fact that whistleblowing systems are mandatory in some countries where Mogo is operating,
- for the purposes of our legitimate interests of Mogo Finance, more specifically to ensure that any misconduct / improper activity / illegal activity is not performed within or in relation to Mogo.

The processing of personal data is based on your consent, and you may at any time revoke your consent. By using this online whistleblowing service, you grant Mogo Finance with your consent for the processing of your personal data. Unless you revoke your consent, Mogo Finance retains your personal data as long as the data is required for the aforementioned purposes, or as required by applicable laws. When such requirements no longer exist, the personal data will be deleted.

5. PERSONAL DATA TO BE PROCESSED

Only the personal data that is strictly necessary for the purposes described above will be processed. Your personal data is collected from you and any publicly accessible sources. The personal data may include your name, contact information, position and any other information you may choose to submit or otherwise collected in the course of investigating the alert.

6. TRANSFER OF DATA

In accordance with this privacy statement and applicable laws, your personal data may be transferred to, and processed by:

- any Mogo group entity if it is necessary to investigate the alert made by you via this online whistleblowing service;
- a prospective seller or buyer in the event Mogo intends to sell or buy any business or assets;
- in cases of alleged criminal or administrative offences, your personal data may need to be disclosed during judicial proceedings.

In above mentioned cases your personal data may be transferred within and outside European Economic Area. If your personal data will be transferred outside European Economic Area, then such a transfer will be covered by standard data protection clauses under Article 46.2. of the General Data Protection Regulation.

If occasionally any other recipient of your personal data would be located outside of the EEA where the law does not provide the same level of data protection, we will adopt appropriate safeguards to ensure compliance with data protection requirements if needed.

7. PERSONAL DATA SECURITY

Mogo Finance endeavors to use appropriate technical and organizational measures (having regard also to the nature of the personal data involved) to protect your personal data from access by unauthorised persons and against unlawful processing, accidental loss, destruction and damage both online and offline. Such measures include, where appropriate, use of firewalls, secure server facilities, encryption, implementing of proper access rights management systems and processes, careful selection of processors and other technically and commercially reasonable measures to provide appropriate protection for your personal data against unauthorized use or disclosure. Mogo Finance may also take appropriate back-up copies and use other such means to prevent the accidental damage or destruction of your personal data and to ensure that Mogo Finance's services are functioning properly.

8. YOUR RIGHTS

With respect to the processing of your personal data, you have the following rights, as appropriate and subject to possible restrictions arising from applicable laws:

- **Right to access:** You are entitled to be informed of what personal data Mogo Finance holds about you.
- **Right to request correction, blocking or deletion:** You are entitled to request Mogo Finance to rectify, delete or block (as appropriate) your personal data that is incorrect, incomplete or otherwise inaccurate.
- **Right to object:** You have the right to object to Mogo Finance's processing of your personal data on compelling, legitimate grounds relating to your circumstances.
- **Right to withdraw consent:** You are entitled to revoke consent for your personal data processing (to the extent such processing is based on consent).

9. CONTACT INFORMATION

If you have any further queries about this privacy statement and this tool in general or you want to exercise your rights mentioned in this privacy statement, please contact info@mogofinance.com.

10. PRIVACY STATEMENT UPDATES

Mogo Finance may update this privacy statement to reflect changes to its data privacy practices.