SAFE PAY STREAM LTD

PRIVACY POLICY

Version 1: October 2026

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Safe Pay Stream

Contents

1. Purpose and Scope..... 3
2. Contractual Position..... 3
3. Applicable Law..... 3
4. Types of Personal Information Collected..... 4
5. Purposes of Processing..... 4
6. Legal Basis for Processing..... 4
7. Third-Party Service Providers..... 5
8. Cross-Border Transfers..... 5
9. Data Retention..... 5
10. Security Measures..... 5
11. Individual Rights..... 6
13. Cookies and Online Tracking..... 6
14. Updates to this Privacy Policy..... 6
15. Contact Information..... 6

1. Purpose and Scope

This Privacy Policy explains how SAFE PAY STREAM Ltd and it is affiliate (“SAFE PAY STREAM”, “we” or “us”) collects, uses, discloses, stores, and protects personal information in the course of providing its services.

This Privacy Policy applies to:

- all users and clients of SAFE PAY STREAM Ltd;
- all personal information collected through the website, online portal, communications, or services; and
- all processing activities conducted by or on behalf of SAFE PAY STREAM.

Acceptance of this Privacy Policy is a condition for establishing and maintaining a business relationship with SAFE PAY STREAM.

2. Contractual Position

This Privacy Policy forms an integral and binding part of the contractual framework governing the relationship between you and SAFE PAY STREAM Ltd, together with the other website policies.

By engaging with SAFE PAY STREAM’s services, you acknowledge that you have read and understood this Privacy Policy.

3. Applicable Law

SAFE PAY STREAM processes personal information in accordance with:

- the Personal Information Protection and Electronic Documents Act (PIPEDA);
- applicable provincial privacy laws, where relevant;
- other applicable Canadian laws; and
- where applicable, foreign data protection laws (including GDPR) for cross-border processing.

4. Types of Personal Information Collected

SAFE PAY STREAM only collects the most relevant, proportionate for each purpose and strictly necessary personal data from you in the course of our business when you access, visit or use our Services. We collect data that are:

- necessary to provide our services to you, such as when you sign-up and open an account with us, when we carry out the necessary know your customer ("KYC") checks, and when you use our Services;
- information necessary to verify your age and identity;
- information about your preferences and interests;
- information about your use of the Services;
- information about the device you are using.

The personal data that we collect, and process includes:

- Data that have to do with your identity and your personal and contact information, such as your first name, last name, username, title, date of birth, personal number/code, date and place of birth, nationality, registered address, correspondence address, details of the personal identity documents (such as passport, identity documents), workplace contact information, the company you work for, images and selfie, signature, tax identification number, tax residency, email address, mobile phone number and other contact details, occupation, PEP status, and other commercial and/or identification information, such as details of your transactions or other information that may be needed under anti-money laundering obligations.
- Data connected to your account with us, such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Payment information – such as details of any transactions carried out using any of the Services, bank account number, e-wallet information, details about payments and transfers made using the Services.
- Data that have to do with the technical aspects of your visit to, and use of, the Services, such as the IP address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system

and platform and other technology on the devices that you use to access and use the Services. This could also include your precise geolocation.

5. Purposes of Processing

Personal information is collected and used for the following purposes:

- client onboarding and account administration;
- compliance with AML / ATF, sanctions, and regulatory obligations;
- provision and operation of services;
- fraud prevention, security, and risk management;
- communication with clients and users;
- legal, regulatory, and audit purposes.

We do not use personal information for purposes incompatible with those described above.

6. Legal Basis for Processing

SAFE PAY STREAM processes personal information on one or more of the following bases, as permitted under PIPEDA:

- contractual necessity;
- compliance with legal and regulatory obligations;
- legitimate business purposes;
- consent, where required by law.

Where consent is required, it is obtained through explicit actions (e.g. acceptance of policies, submission of information).

7. Third-Party Service Providers

SAFE PAY STREAM may share personal information with regulated third-party service providers, including:

- payment institutions or electronic money institutions;

- AML / KYC and sanctions screening providers;
- technology, hosting, and security providers;
- professional advisers and auditors.

Such disclosures are made only where necessary and subject to contractual and organisational safeguards.

SAFE PAY STREAM does not sell personal information.

8. Data Retention

SAFE PAY STREAM retains personal information only for as long as necessary to fulfil the purposes for which it was collected, including:

- AML / ATF records: minimum 5 years or longer where required by law;
- transaction and business records: as required under applicable legislation;
- general communications: as necessary for legal, regulatory or dispute-resolution purposes.

Once retention periods expire, data is securely deleted or anonymised.

10. Security Measures

SAFE PAY STREAM implements appropriate technical policies, rules and organisational measures to protect personal information against unauthorised access, loss, misuse, or disclosure.

Despite these measures, no system can guarantee absolute security.

11. Individual Rights

Subject to applicable law, individuals may request:

- access to their personal information;
- correction of inaccurate or incomplete information;
- information about how their data is used.

Requests may be submitted using the contact details below and will be handled in accordance with PIPEDA.

12. Regulatory and Legal Disclosure

SAFE PAY STREAM may disclose personal information:

- to FINTRAC or other competent authorities;
- where required by law or court order;
- to enforce legal rights or protect the integrity of services.

Such disclosures are made in accordance with applicable legal requirements.

13. Cookies and Online Tracking

SAFE PAY STREAM uses cookies and similar technologies in accordance with its Cookie Policy to measure how our website is used and how our advertising performs.

Where required by law, consent is obtained through the website's cookie management tools.

14. Updates to this Privacy Policy

This Privacy Policy may be updated from time to time to reflect changes in law, regulation, or business practices. To ensure that you are always aware of how we use your personal data we will update the is Privacy Policy from time to time to reflect changes to our use of your personal data.

Updated versions will be published on the website. Continued use of services constitutes acceptance of the updated Privacy Policy.

15. Contact Information

Questions or requests relating to this Privacy Policy may be directed to:

SAFE PAY STREAM Ltd
Email: info@safepaystream.com

Safe Pay Stream

Website: safepaystream.com
Phone: +1 (514) 565 6516

Address: 1248-13355 Commerce PKWY, Richmond, British Columbia, Canada, V6V 2L1