

# **Privacy Policy**

At ICE Currency Exchange Service we do not collect your information for marketing or unrelated purposes unless you give us clear permission.

You may choose to allow us to use your information to enhance your experience—such as receiving relevant updates or participating in customer feedback initiatives. This is entirely optional.

Our commitment to your privacy is guided by four core principles:

- Your consent We collect and use your information only when required or with your permission.
- Necessity We collect only the information needed for legal, regulatory, and service-related purposes.
- Security We protect your data through strict safeguards and internal controls.
- Transparency We're clear about how your information is used and why

## What does it mean to give ICE Currency Exchange your consent?

When you provide your personal information, you are giving ICE Currency Exchange permission to collect, use, and share it—but only as needed to:

- Complete your currency exchange transactions
- Meet legal and regulatory obligations (like Anti-Money Laundering laws)

We only collect and use the information that's necessary to serve you and protect your transactions—nothing more, unless the law requires it.

Your consent replaces any previous one you've given and remains valid as long as you have a business relationship with ICE

#### Can You Refuse or Withdraw Consent?

In some cases, yes. You have the right to refuse or withdraw your consent for us to collect or use certain types of information. <u>However, some information is mandatory for us to:</u>

- Verify your identity
- Fulfill legal obligations (such as regulatory recordkeeping)
- Complete a transaction securely

If you choose not to provide this required information or withdraw your consent, we may not be able to complete the transaction or offer you our services

## **Optional Preferences**

You are always in control of your privacy. you can say **yes** or **no**, and update your preferences at any time.

## **Collecting Only What's Necessary**

What kind of personal information does ICE Currency Exchange collect?

At ICE Currency Exchange, we collect only the information required to:

- Complete your currency exchange transaction
- Verify your identity
- Fulfill our legal obligations under Anti-Money Laundering (AML) and other financial regulations

We do **not** collect unnecessary or sensitive information unrelated to our services unless it is strictly required by law for a specific transaction. The type of information we collect depends on the nature of your transaction. If you're completing a high-value exchange (e.g., over \$3,000 CAD), additional details like ID and occupation are required by regulations.

Category	Examples
Identification Information	Full name, date of birth, government-issued ID
Contact Information	Phone number, address (when required)
Transaction Information	Amount exchanged, currency, payment method
Purpose of Transaction	Reason for the exchange, source of funds (for high-value transactions)
Employment Details	Your occupation (must be specific), employer (when required by regulation)
Third-Party Information	Name and relationship of third party, if acting on someone else's behalf
Website and App Usage Data	Cookies, browsing preferences (language, province), clickstream activity,

We will always tell you what we need and why. If you are not using a particular product or conducting a high-value transaction, we will not collect the information associated with it.

#### How your information is collected

#### 1. Directly from You - In Person

We collect personal information **when you interact with us face-to-face** at one of our ICE branch locations. This may include:

- Verifying your identity during a transaction
- Asking for your occupation and source of funds (for higher-value transactions)
- Recording information needed to meet our legal and regulatory requirements We may also collect limited information about third parties, **but only when required**, such as if you're completing a transaction on someone else's behalf.

We do **not** collect personal information over email, phone, or online chat. All services are conducted in person at our counters.

#### 2. Through Your Use of Our Website

When you visit our website, we may collect technical and browsing-related information through **cookies and tracking technologies**, including:

- Preferred language or location settings
- IP address and browser type
- Device type or operating system
- Pages viewed and time spent on our site

This data helps us **improve website performance and usability** but is **not used to identify you personally** unless you voluntarily provide your details (e.g., via a form).

#### **Being Transparent About How We Use Your Information**

At ICE we collect and use your personal information only for purposes that are directly related to your transactions and to meet our legal obligations.

We will always inform you if we plan to use your information for a new purpose—unless the law allows or requires us to do so without notice.

# Why We Use Your Personal Information

We may use your personal information for the following reasons:

## To Identify You

- To verify your identity before completing a currency exchange
- To confirm that your personal information (such as name or ID) is current and accurate
- To apply any identification requirements under Anti-Money Laundering (AML) regulations

## To Provide You with Our Services

- To process your currency exchange transaction
- To confirm transaction details, including through our Click & Collect service
- To ensure proper documentation when transaction amounts reach certain regulatory thresholds (e.g., \$3,000 CAD or more)
- To contact you if additional information is needed for compliance purposes

# To Meet Our Legal and Regulatory Obligations

- To prevent money laundering, terrorist financing, fraud, or other financial crimes
- To report or flag certain transactions to the proper authorities as required by law
- To maintain records in accordance with Canadian and U.S. regulations
- $\bullet\hspace{1.5pt}$  To support regulatory audits or government investigations when required
- To confirm information such as your occupation or source of funds (if applicable)

X We do not use your personal information for marketing or offer personalization unless you give us your explicit consent.

#### Who Has Access to Your Information?

Access to your personal information is restricted to:

- ICE employees and compliance staff who need the information to perform their duties
- Authorized IT and administrative support teams, where required for system security and maintenance
- Government agencies, law enforcement, or regulators, but only when we are legally required to report or cooperate

All ICE employees are trained on privacy and confidentiality, and only those with a valid reason can access your data.

#### Who Might We Share Your Information With?

We **do not sell** your personal information—ever. However, we may disclose your information:

required under AML or tax laws

- To government authorities or law enforcement (e.g., FINTRAC,CRA) if
- To external auditors or compliance partners (e.g., for regulatory reviews) under strict confidentiality
- To third-party service providers (e.g., IT support or secure storage vendors), but only those under contract with ICE and bound by privacy obligations

Any service providers we work with must meet our high standards for data protection and confidentiality.

#### **Protecting the Security and Confidentiality of Your Information**

At ICE Currency Exchange, we take the protection of your personal information seriously. Whether it's your name, ID, or transaction details, we apply rigorous security measures to make sure it stays private and secure.

#### How We Keep Your Information Safe

We use a combination of **physical, technological, and administrative controls** to protect your personal information:

#### **Physical Security Measures**

- Restricted access to workspaces and records
- Secure filing cabinets and locked storage for documents
- Surveillance systems at selected locations

## Technological Security Measures

- Password-protected systems
- Encrypted data for electronic storage and transmission
- Role-based access controls—only authorized staff can view sensitive data
- Activity monitoring to detect suspicious access or misuse

# Administrative Security Measures

- Only staff with a valid business need may access your information
- All ICE employees receive regular training on privacy and data protection
- Internal policies govern how personal data is handled, stored, and reviewed
- Compliance oversight ensures continuous monitoring of security practices

# Where Your Information Is Stored

Your personal information is primarily stored in **Canada**. If we work with external partners or service providers (e.g., for data hosting or secure document destruction), we ensure they meet strict privacy standards and are contractually required to protect your information—whether they are in Canada or elsewhere.

## How Long We Keep Your Information

We keep your personal information only as long as necessary to meet:

- Legal and regulatory retention requirements (e.g., AML laws)
- Internal audit, tax, and reporting obligations

Even after your transaction is completed, we may need to retain your records for a number of years, as required by law.

# How We Dispose of Your Information

When information is no longer needed, we ensure it is disposed of **safely and permanently**. This may involve:

- Secure shredding of paper documents
- Permanent deletion or de-identification of digital files
- Using certified vendors for data destruction, where applicable

These practices follow industry best standards to prevent unauthorized access or recovery of the information.

#### **Respecting Your Rights Over Your Personal Information**

At ICE Currency Exchange, we respect your rights and ensure you have control over your personal information.

## Can I Access, Correct, or Update My Information?

Yes. You have the right to:

- Access the personal information we have about you
- Request corrections to inaccurate or incomplete information
- Update your details if your personal situation changes (e.g., name or occupation)

To make a request, simply contact our Privacy Office at

#### privacy.canada@icecurrency.com

Please include:

- Your full name and contact details
- A clear description of the information you're requesting or want to correct
- Any relevant context to help us identify your records

We may need to verify your identity before proceeding. In rare cases, we may apply a reasonable fee (e.g., for printing or mailing), and if so, we'll inform you in advance.

#### What if I Have a Privacy Concern or Complaint?

#### Step 1: Contact Us

Start by contacting our Privacy Office at

#### privacy.canada@icecurrency.com

We'll work quickly to address your concern.

## Step 2: Escalate the Matter

If you are not satisfied with our response, you may contact the appropriate federal or provincial Privacy Commissioner, such as the Office of the Privacy Commissioner of Canada (OPC).

## **Understanding Our Privacy Policy**

Our Privacy Policy applies to:

- Anyone who uses ICE Currency Exchange services
- Any individual whose personal information we collect while carrying out currency exchange operations
- Anyone who contacts us or uses our Click & Collect service

We collect, use, disclose, and protect your personal information in full compliance with Canadian privacy laws, including **PIPEDA** and **Quebec's Law 25**, where applicable.

# Can the Privacy Policy Change?

Yes, we may update our Privacy Policy from time to time.

If changes are made, we will post an updated version on our website with the **effective** date clearly indicated.

We encourage you to review our Privacy Policy periodically to stay informed about how we protect your information.

## Quebec Resident

If you are a **resident of Quebec** and your personal information is collected as part of a **transaction or interaction that occurs entirely within Quebec, Law 25** applies in full. This means:

- You have enhanced rights over your data, including access, portability, and erasure
- Your consent must be clear and specific, and cannot be assumed.
- Your personal data is stored, used, and disposed of according to strict retention and destruction rules.
- You can request details on any automated decision-making that may apply to you.
- If there's ever a data breach involving your information, we will notify you
  and the regulator (CAI) if there is a risk of harm.

We apply **the highest applicable standard** based on your location and the nature of your interaction with us.

We apply **the highest applicable standard** based on your location and the nature of your interaction with us.

For questions or to exercise your privacy rights, please contact our Privacy Office: 

| privacy.canada@icecurrency.com | |