

Website Privacy Policy

Public privacy policy for EASYFY SOLUTION LTD.

Company	EASYFY SOLUTION LTD. Company No. 1506236-5
Registered office	1315 Pickering Pkwy, Suite 300, Pickering, ON L1V 0C4, Canada
Regulatory status	Registered with FINTRAC as a money services business (MSB M23975600) and registered with the Bank of Canada as a payment service provider under the Retail Payment Activities Act (RPAA).
Document owner	Privacy Officer Effective date: 01/06/2026

1. Purpose and Scope

This Privacy Policy explains how EASYFY SOLUTION LTD. (Easyfy, the Company, we, us or our) collects, uses, discloses, retains and protects personal information through easyfysolution.com, website inquiries, prospective-customer discussions, onboarding and the payment services we may provide under a separate agreement.

The Company is based in Canada. Canadian privacy law applies to our activities as required, including the Personal Information Protection and Electronic Documents Act (PIPEDA) and applicable provincial law. Other privacy laws may apply depending on where an individual is located and how we offer services there. References to rights or legal grounds outside Canada apply only where the relevant law governs the processing.

2. Who Is Responsible

EASYFY SOLUTION LTD. is responsible for personal information under its control. Questions, requests and complaints may be directed to the Privacy Officer at compliance@easyfysolution.com or to the registered office shown above.

3. Personal Information We May Collect

The information we collect depends on how a person interacts with us. It may include:

- Contact and inquiry information, such as a name, business name, email address, telephone number, subject, message and communication history.
- Business and onboarding information, such as corporate records, business activities, directors, authorized representatives, beneficial owners, identification documents, addresses, tax or registration details, expected activity and source-of-funds information where required.
- Service and transaction information, such as payment instructions, transaction references, amounts, dates, counterparties, account or payout details, refunds, disputes and compliance review records, where Easyfy provides services under a separate agreement.
- Website and device information, such as IP address, browser and device type, pages viewed, referral information, timestamps, security logs and cookie choices.

- Information from third parties, such as banks, acquirers, payment processors, identity-verification or screening providers, public registries, sanctions and politically exposed person sources, fraud-prevention services and professional advisers.

Please do not submit sensitive personal information through the general website contact form unless Easyfy specifically requests it through an appropriate channel.

4. How We Use Personal Information

We may use personal information to:

- respond to inquiries, provide requested information and manage prospective or existing business relationships;
- assess applications, verify identity and business information, conduct KYC/KYB, sanctions and risk checks, and meet anti-money-laundering and regulatory obligations;
- provide, administer, secure and improve services delivered under a separate customer or merchant agreement;
- process or reconcile transactions, investigate errors, disputes, fraud, suspicious activity or security incidents, and communicate with relevant partners;
- maintain business, tax, accounting, compliance and audit records;
- protect our rights, systems, customers and partners, enforce agreements and comply with lawful requests; and
- send business updates or marketing communications where permitted, with a means to unsubscribe.

5. Consent and Other Legal Grounds

We obtain meaningful consent where required and collect, use or disclose personal information without consent only where law permits or requires it. Where European or United Kingdom data-protection law applies, processing may be based on consent, steps requested before entering a contract, performance of a contract, compliance with legal obligations, protection of vital interests, or legitimate interests that are not overridden by the individual's rights.

Consent may be withdrawn, subject to legal and contractual restrictions and reasonable notice. Withdrawal does not affect earlier lawful processing and may prevent us from providing a requested service.

6. How We Share Personal Information

We do not sell personal information. We may disclose it only as reasonably necessary to:

- banks, acquirers, card or payment networks, processors, settlement providers and other financial partners;
- identity-verification, fraud-prevention, sanctions-screening, hosting, cloud, communications, analytics or technical-support providers that perform services for us;
- auditors, lawyers, accountants, insurers and other professional advisers;
- FINTRAC, the Bank of Canada, law-enforcement bodies, courts, regulators, tax authorities or other public bodies where disclosure is authorized or required;
- a prospective purchaser, investor or successor in connection with a proposed or completed corporate transaction, subject to appropriate protections; or
- another person with the individual's direction or consent.

Service providers may process information only for the purposes for which it is made available, subject to applicable agreements and law. Easyfy remains responsible for personal information under its control.

7. International Processing and Transfers

Easyfy and its service providers or financial partners may process personal information in Canada, the United Kingdom, the European Economic Area, the United States or other countries relevant to a service or transaction. Information processed outside a person's home jurisdiction may be subject to local law and lawful access by authorities there. Where required, we use contractual, organizational or other legally recognized safeguards for an international transfer.

8. Retention

We retain personal information only for as long as reasonably necessary for the stated purposes and applicable legal, accounting, dispute and compliance requirements. Retention periods vary by record. Certain identity, transaction and AML records must generally be retained for at least five years from the legally applicable event or date. Website inquiries and marketing records are retained according to business need, consent status and applicable limitation periods. Information is securely deleted, anonymized or otherwise disposed of when it is no longer required.

9. Safeguards

We use administrative, technical and physical safeguards appropriate to the sensitivity, volume and use of the information. These may include access controls, confidentiality obligations, secure service providers, record-management controls and incident-response procedures. No internet transmission or storage method is completely secure, and we cannot guarantee absolute security.

10. Individual Rights and Choices

Depending on applicable law, an individual may request access to personal information, correction of inaccurate information, information about its use or disclosure, withdrawal of consent, deletion, restriction, portability or an objection to certain processing. Rights are subject to lawful exceptions, identity verification and records we must retain.

Requests may be sent to compliance@easyfysolution.com. We will respond within the period required by applicable law. Marketing messages may be stopped using the unsubscribe method in the message or by contacting us. Cookie choices are described in the Cookie Policy.

11. Children

The website and Easyfy's business services are not directed to children. We do not knowingly seek personal information from children through the general website. If a parent or guardian believes a child has provided personal information, they should contact us so that we can take appropriate action.

12. Complaints

A privacy concern should first be submitted to the Privacy Officer. If the matter is not resolved, an individual may have the right to complain to the Office of the Privacy Commissioner of Canada, a provincial privacy authority, or another competent data-protection authority, depending on the applicable law.

13. Changes to This Policy

We may update this Privacy Policy to reflect legal, operational or service changes. The current version will be posted on the website with its effective date. If a change materially affects how we use information already collected, we will provide additional notice or obtain consent where required.

14. Contact

Privacy Officer
EASYFY SOLUTION LTD.
1315 Pickering Pkwy, Suite 300
Pickering, Ontario L1V 0C4, Canada
Email: compliance@easyfysolution.com

Approval and Signature

Signed for and on behalf of	EASYFY SOLUTION LTD.
Name	Obner Knoener Mozarino
Title	Director / Compliance Officer
Signature / Date	Signature:  Date: 01/06/2026