PRIVACY POLICY

VER. 1.0

Canada, 2026

Document Information

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1. Basic Provisions

We, **MAGMA FINANCE INC.,** duly incorporated and operating under the laws of Canada (hereinafter also referred to as the **Company** or **We**).
Full details are: MAGMA FINANCE INC.,
Company number 1001115319, Date of incorporation: January 13, 2025
Registered address: 300 Supertest Road, Unit 1, North York, Ontario, M3J2M2, Canada

I.Intent

MAGMA FINANCE INC. is a Canadian corporation, operates a Money Service Business (MSB). The *Personal Information Protection and Electronic Documents Act* (PIPEDA) and *Personal Information Protection Act* (PIPA) establish rules to govern the collection, use, and disclosure of personal information. MAGMA FINANCE INC. is committed to protecting and respecting the personal information of its customers, employees, business partners, and all other entities it interacts with in accordance with PIPEDA and PIPA accordingly. This policy will provide guidelines to ensure company's compliance with the laws and proper protection of the personal information that might be collected, stored or used by the company.

II.Commitment to Privacy

The appropriate collection, use and disclosure of clients' personal information is fundamental to our day-to-day operations and to provision of our professional services. Protecting the privacy and the confidentiality of our clients' personal and business information is important to the staff at MAGMA FINANCE INC.

As a service provider, MAGMA FINANCE INC. will be in receipt of our clients' personal and business information as well as the information of their respective clients. All such information is being provided to MAGMA FINANCE INC. under various confidentiality provisions on top of which apply the provisions of PIPEDA and PIPA.

We strive to provide our clients with an excellent service, and in doing so, we will abide by our commitment to privacy in the collection and handling of personal information.

III.Applicability of This Privacy Policy

This policy attests to our commitment to privacy and demonstrates the ways we ensure that our clients' and employees' privacy is protected. This policy applies to the personal information of all our clients, employees, contractors and service providers that is in our possession and control.

IV.What is Personal Information?

<u>Personal information</u> means any and all information about an identifiable individual.
<u>Business information</u> means any information about business activities, operations or projects of our clients.
It does not matter what is the source of the information, whether it refers to our clients or their

respective clients, and whether there are additional individuals or businesses that are responsible for the collection and protection of such information. This policy will apply to all personal and business information retained by MAGMA FINANCE INC. and its employees.

V.Guidelines for Compliance

The following guidelines have been implemented to ensure MAGMA FINANCE INC. remains compliant with PIPEDA and PIPA requirements. The personal information of MAGMA FINANCE INC. employees, customers, clients, business partners, etc., must be managed so as to meet proper information practices, applicable laws and standards of practice.

Accountability

We take our commitment to securing client's privacy very seriously. Each service provider, contractor and employee of MAGMA FINANCE INC. is responsible for the personal information under his/her control. Our employees are informed about the importance of privacy and receive information periodically to update them about our Privacy Policy and related issues.

Purpose of Information Collection

Personal and business information is collected in order to establish a relationship with our clients and provide them with our professional services. MAGMA FINANCE INC. obtains most of the personal information directly from its clients or from other sources whom a client has authorized to disclose such information to MAGMA FINANCE INC. MAGMA FINANCE INC. will limit the collection and use of information only for the following permitted purposes:

- To prepare and provide our professional services to a client;
- To plan, administer and manage our internal operations;
- To conduct risk management and quality improvement activities;
- To compile statistics (without the use of identifiable information);
- To comply with legal and regulatory requirements, and
- Fulfill other purposes permitted or required by law.

MAGMA FINANCE INC. will obtain client's particular consent if the use of the client's personal information is required for any other purpose. In addition, where possible, MAGMA FINANCE INC. will limit its use of personal information only to non-identifiable information (no names, ID's and other identifying details will be used).

In order to comply with the purposes stated herein, MAGMA FINANCE INC. will implement, where possible, an information segregation procedure, which will ensure separation of any identifiable information from other information collected from its clients.

Consent

The provision of services by MAGMA FINANCE INC. is regularly preceded by a contract signed by a client. Client's execution of such contract will serve as its explicit consent to disclosure and collection of information by MAGMA FINANCE INC.

Where the information is collected through client's use of MAGMA FINANCE INC.' websites, social media pages and other online tools, clients will be notified of such collection through corresponding privacy policies and terms of use implemented to the websites and social media pages by MAGMA FINANCE INC. In any case, clients' use of MAGMA FINANCE INC.' websites and social media pages shall serve as their express consent for collection and use of their personal information by MAGMA FINANCE INC.

A client has the right to withdraw his/her consent at any time and for any reason. In such case, MAGMA FINANCE INC. will cease any use of the client's personal information.

Notwithstanding the withdrawal request, the law permits (and in certain circumstances requires) certain collection, use, storage and disclosure of the personal information, despite the consent withdrawal. Such information might be stored for the record keeping purposes, future accounting and legal purposes, but its use will be limited only to the circumstances of emergency or in accordance with the order of any relevant legal or administrative tribunal.

Limiting Collection Use, Disclosure and Retention

MAGMA FINANCE INC. collects information by fair and lawful means and collects only that information which may be necessary for purposes related to the provision of its professional services. The scope of collected information and the purpose(s) of its use shall comply with the express terms and conditions published by MAGMA FINANCE INC. at the time of its collection.

Under no circumstances does MAGMA FINANCE INC. sell client lists or other personal information to third parties.

MAGMA FINANCE INC. will retain personal information only for the time it is required for the purpose of providing its professional services, managing client's file and records keeping, and will destroy such information once it is no longer needed. However, some information is kept for a longer period for various legal, accounting and tax related purposes. The storage and destruction of the personal information shall be governed by the Records Retention and Disposal Policy.

Accuracy

As the main source of the personal information, the client is responsible to provide accurate, up-to-date and relevant information and to advise MAGMA FINANCE INC. of any changes in a timely manner. MAGMA FINANCE INC. will not be responsible for the accuracy of information provided by its clients or other service providers.

Where clients requests, MAGMA FINANCE INC. will allow the correction of the client's personal information to ensure its on-going accuracy. While MAGMA FINANCE INC. is not responsible to verify and confirm the accuracy of information that has been collected from its clients, where company's employees come to a conclusion that certain information is inaccurate and requires correction or re-collection, such employee shall provide all the details pertaining such information to the company's compliance function.

Safeguards: Protecting Private Information

Protection and safeguarding of clients' personal information is of utmost importance for MAGMA FINANCE INC., and we will invest our reasonable efforts into protecting clients' information from unauthorized disclosure or use.

MAGMA FINANCE INC. maintains personal information in a combination of paper and electronic files. All such records are stored on the premises with the access limited only to those with the need to know and might be transferred to off-site storage following the completion of the MAGMA FINANCE INC. services.

All information stored on paper files will be filed in locked filing cabinets, inside controlled facility of MAGMA FINANCE INC., with the keys being controlled by the company's compliance function, or chief information officer or chief security officer. Only employees with the express need-to-know and authorization of their supervisor shall have an access to the keys.

All information stored in a digital format shall be maintain on password protected devices, with the passwords complying with the company's Electronic Devices Policy and procedures.

Access to personal information will be authorized only for the service providers and employees that are dealing with the client, and other agents who require access in the performance of their duties, and to those otherwise authorized by law.

MAGMA FINANCE INC. computer systems are password-secured and constructed in such a way that only authorized individuals can access secure systems and databases.

Privacy legislation compliance

MAGMA FINANCE INC. will ensure on-going compliance of the collection, use and retention procedures with the evolving and changing legal regulations applicable to the company's operations. The compliance process will be in accordance with the Legal Compliance Policy of the corporation.

The company will advise its clients of any changes in its use and retention policies with regards to the personal information of a client stored or used by MAGMA FINANCE INC. The CIO will define the means of notification (whether a personal notice, update of Privacy Policies on its websites or use of other means of communication).

Relocation of Personal Information

MAGMA FINANCE INC. is the custodian of all information collected and stored by the company. It will continue to comply with its policies and procedures with regards to the personal information, its protection and destruction.

In any situation of status change or relocation of personal information of MAGMA FINANCE INC. to its respective subsidiaries, amalgamated or merged companies, the CIO shall verify that:

i. Any new custodian of information comply with at least as stringent provisions as MAGMA FINANCE INC.;
ii. All clients whose information is stored or used by MAGMA FINANCE INC. will be informed of a change, will be provided with the contact information of the person responsible for the protection of information in the new entity and will be provided with an opportunity to remove their information from MAGMA FINANCE INC.' custody.

VI.Access and Correction

Access by Individual

With limited exceptions in accordance with the law, MAGMA FINANCE INC. will give access to its clients to their personal information within a reasonable time, upon presentation of a written request and satisfactory identification. A service fee may be charged to cover our expenses associated with such request; an advance notice will be provided prior to the processing of a request.

All requests and disclosure of information must be made in writing with the client providing written request to review their personal information. Where client requests so expressly, MAGMA FINANCE INC. may send their personal information to their personal email address, in which case the client will be requested to sign a corresponding waiver in favour of MAGMA FINANCE INC. No disclosure over the phone shall be made. All other rules will be in accordance with the company's Information Security Policy.

"Satisfactory identification" under this Policy shall mean verifying of the client's identity with two pieces of government issued ID's, one of which contains person's photograph. All ID's must be valid and clearly legible.

In a case an error is found in a personal information, MAGMA FINANCE INC. will make the appropriate corrections following its receipt of client's written request. Any correction requests should be sent to the address on the website of the Company.

If, for the reasons provided by the law or by a relevant legal or administrative tribunal, an access or correction request is denied, a written confirmation of such denial will be provided to the client for review and possible challenge.

Access by Third Parties

As a rule, MAGMA FINANCE INC. will not allow access to personal information to any third parties who are not the owner of a personal information.

Nonetheless, circumstances might require involvement of the company's management and the compliance function to provide proper response to various requests for access.

All individuals of organizations that attempt to access personal information of any of MAGMA FINANCE INC. clients shall be deemed as non authorized to access until provided otherwise. This shall include independent parties, media, law enforcement agencies and more. In a case of the request to access information the following procedure must be followed:

a. An employee receiving the request shall not provide direct response, shall collect the contact and personal information of the requesting party. The employee shall advise the party that no access may be allowed at the time of inquiry, and that one of the senior company's officers will contact the requesting individual.

b. All the details of the request must be reported immediately to the company's company's CEO and the legal counsel.

c. No disclosure of any personal or business information will be allowed without obtaining an express written consent of the individual whose information is the third party seeking to access.

d. Where no consent was provided by the individual, or MAGMA FINANCE INC. was not able to reach the individual to obtain such consent, the access to information shall be denied, unless there is court order providing otherwise.

e. Unless there is an express order from the authorized court or administrative tribunal, MAGMA FINANCE INC. will delay the disclosure of information until client's consent has been obtained. MAGMA FINANCE INC. will send a written notice to the client informing the client of the request to access information and will make a reasonable attempt to receive client's response.

f. All requests for disclosure of personal information in accordance with a court or administrative tribunal order will be forwarded for review and response by the Legal Counsel of MAGMA FINANCE INC.

g. In a case of a media request(s), MAGMA FINANCE INC. will respond that it is not able to disclose the information and will direct the requesting person to contact the owner of the information directly. Employee who receives media request to access information shall not communicate with the requesting person and immediately forward the request to the company's CIO. No further actions will be taken in a case of a media request.

All employees and subcontractors of MAGMA FINANCE INC. will be trained on proper information disclosure procedures, including information security training and various risks and exposures of the company with regards to the personal information of its clients.

VII.Breach, Theft or Unauthorized Access

MAGMA FINANCE INC. will immediately inform any affected clients and individuals of any breach, theft or unauthorized use of their personal information, and will implement any remedial actions in order to limit any further disclosure or prevent additional instances of similar circumstances.

In addition to the individual(s) affected by the breach, MAGMA FINANCE INC. may notify other affected parties, which identity might be reasonably identified by MAGMA FINANCE INC. MAGMA FINANCE INC. shall notify other organizations and government institutions if it is believed that doing so can reduce or mitigate the harm from the breach.

Where it is reasonable in the circumstances to believe that the breach of security safeguards creates a real risk of significant harm to an individual, MAGMA FINANCE INC. will act immediately to inform any affected individuals, Office of the Privacy Commissioner, as well as any government institutions or organizations that MAGMA FINANCE INC. believes can reduce the risk of harm that could result from the breach or mitigate the harm, including without limitation such organizations as law enforcement, payment processing, information storage, email providers and more.

Significant harm shall include any of the following: bodily harm, humiliation, damage to reputation or relationships, loss of employment, business or professional opportunities, financial loss, identity theft, negative effects on the credit record and damage to or loss of property.

Notwithstanding the provisions contained in this section, MAGMA FINANCE INC. will take any reasonable and diligent precautions to protect personal information in its possession. Nevertheless, MAGMA FINANCE INC. may fall victim to unauthorized access, theft or destruction of the information it possesses, in which case and as long as MAGMA FINANCE INC. acted in a reasonable manner, it shall not be held responsible or accountable for such instances.

MAGMA FINANCE INC. will keep all the records relating to potential or actual breaches, whether reported to the OPC or not. The information shall contain the following details:

- date or estimated date of the breach;
- general description of the circumstances of the breach;
- nature of information involved in the breach;
- internal assessment of "the real risk of significant harm" standard; and
- whether or not the breach was reported to the Privacy Commissioner of Canada/individuals were notified.

VIII.Minors and individuals lacking legal capacity

Most of MAGMA FINANCE INC. services are being offered to adult clients in the age of legal capacity (in Canada – 18 years old) who can provide their valid consent for collection and use of their personal information. All MAGMA FINANCE INC. services and supporting legal documents assume that the individuals consenting to MAGMA FINANCE INC. services and incidental collection of information are adults with the legal capacity to provide such consent.

Where MAGMA FINANCE INC. in aware that certain services are being offered to minors or individuals lacking legal capacity, or that particular individuals access MAGMA FINANCE INC.' general services, the company will seek the consent from their respective legal guardians who have the authority and the capacity to provide such consent.

Where MAGMA FINANCE INC. becomes aware of certain personal information that was collected from minor clients or individuals lacking legal capacity without proper consent, MAGMA FINANCE INC. will act promptly to investigate the process of collection of such information, to obtain a valid consent where possible, or to delete such personal information where obtaining consent was not possible.

IX.Complaints

Every individual having concerns or complaints with regards to the collection, use, storage or destruction of their personal information will have the right to contact company's CEO and submit their complaint for review by the company.

Should MAGMA FINANCE INC. fail to resolve the complaint, it will provide the individual with a contact information of the Ontario Privacy Commissioner for further review and resolution of the complaint(s).

X.Maintenance

This policy as well as any procedures hereunder will be reviewed by the Company at least annually. Where required, a proper updates/changes will be made, and all employees and subcontractors of MAGMA FINANCE INC. will be trained on the provisions of the new/updated policy.