

PAYSEND

COOKIE POLICY

Version 2.0

1. Scope

This Cookie Policy applies to the website and mobile application operated by **Paysend CA Ltd** (“Paysend”, “we”, “us”, or “our”). Paysend Canada Ltd acts as an organisation subject to applicable Canadian privacy legislation, including:

- Personal Information Protection and Electronic Documents Act (“PIPEDA”);
- Canada's Anti-Spam Legislation (“CASL”);
- The Act respecting the protection of personal information in the private sector (Québec), as amended by Bill 64;
- Applicable substantially similar provincial private-sector legislation.

This Policy has been adopted to ensure compliance with Canadian privacy and electronic communications requirements. For information on how we process personal information more generally, please refer to our **Privacy Notice**.

2. What Are Cookies?

Cookies are small data files placed on your device when you visit our website or use our application. They help us operate, protect and improve our services. Cookies may be:

- Session cookies, which are deleted when you close your browser; or
- Persistent cookies, which remain on your device for a defined period.

Cookies may be set by Paysend (“first-party cookies”) or third-party service providers (“third-party cookies”). We may also use similar technologies, including tracking pixels, SDKs, scripts, local storage and device identifiers.

3. Legal Basis and Consent

Under PIPEDA, consent must be meaningful, informed and appropriate to the sensitivity of the information. Under Québec Law 25, consent must be clear, free and informed, and given for specific purposes. Express consent is required where sensitive personal information is involved.

- **Strictly Necessary Cookies:** These are deployed without prior consent where they are essential to enable secure login, process transactions, prevent fraud, and maintain session integrity.

- Non-Essential Cookies: All non-essential cookies are disabled by default and are only activated once you provide consent via our cookie banner.

4. Types of Cookies We Use

Advertising Cookies

These cookies may be set through our site by advertising partners to build a profile of your interests and display relevant advertising on other sites. Under Canadian law, behavioural advertising requires informed consent prior to activation.

Performance Cookies

These cookies allow us to count visits and traffic sources to measure and improve website performance. While data is aggregated, certain analytics (such as IP addresses) may constitute personal information under Canadian law.

Strictly Necessary Cookies

Always Active

These cookies are necessary for the website to function and cannot be switched off. They are typically set in response to actions such as logging into your account, setting privacy preferences, or initiating transactions. These cookies cannot be switched off in our systems.

Customer Experience Cookies

These cookies enable enhanced functionality and personalisation. They may be set by us or by third-party providers whose services we have integrated into our pages. If disabled, some services may not function properly.

5. Managing Your Preferences

Upon first visit, you are presented with a cookie banner offering:

- Allow All Cookies
- Reject Non-Essential Cookies
- Manage Preferences

You may update your preferences at any time using the **“Cookie Settings”** link at the bottom of our website. Rejecting non-essential cookies will not block access to our site, though some functionality may be impaired.

6. Cookies and Personal Data

Certain cookies collect personal information, including IP addresses, device identifiers, online identifiers, behavioural browsing data and geolocation data. Such information is processed in accordance with PIPEDA and provincial legislation. We retain cookie-related personal information only for as long as necessary to fulfil the identified purposes and in accordance with our retention schedule.

7. International Transfers

Certain third-party service providers may process personal information outside Canada. Where personal

information is transferred outside Canada, we:

- Assess the sensitivity of the information;
- Implement contractual safeguards;
- Ensure a level of protection comparable to Canadian privacy standards.

For Québec residents, cross-border disclosure assessments are conducted in accordance with Québec Law 25 requirements.

8. Cookie Review and Governance

Our cookie use is reviewed regularly by the Data Privacy Officer.

- Audits: Cookie inventories are audited periodically.
- Accountability: Consent logs are retained for accountability purposes.
- Governance: Updates to this Policy are reviewed and approved through internal governance procedures.

9. Contact Details

For any questions regarding this Cookie Policy or to exercise your privacy rights, please contact:

Privacy Officer Paysend Canada Ltd email: dataprotection@paysend.com.

You have the right to lodge a complaint with: Office of the Privacy Commissioner of Canada

30 Victoria Street, Gatineau, Quebec K1A 1H3, Toll-free: 1-800-282-1376