



Personal Information Processing Code of Practice

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Ownership, Approval and Last Review

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Version History

Instructions for filling out the version history table:

- Only changes to the content of this document should be recorded in the version history table.

Date (MM/DD/YYYY)	Version Number	Description of Change	Performed By (Job Title)
07/15/2024	0.1	Final Draft Version	Manikant Ramannagari (Senior GRC Analyst)
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10/21/2025	2.1	Updated mailing address	Nicole Lake (GRC Analyst)

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WHO ARE WE AND WHAT DO WE DO?

FISPAN Services Inc. (together with its subsidiaries and affiliates, collectively, “**FISPAN**”, “**us**”, “**we**”, “**our**”) is a technology company that provides a platform and solutions (the “**FISPAN Platform**”) that facilitate the exchange of business and financial data between FISPAN’s bank partners (“**Bank Partners**”) and their business clients (“**Business Clients**”) through connectivity with the applicable Bank Partner systems and each Business Client’s ERP (enterprise resource planning) or accounting systems (“**ERP Systems**”).

As a service provider to our Bank Partners, pursuant to agreements entered into with them, FISPAN enables payment, account, and other related business data of the Business Client to be synced between the Bank Partner systems and the Business Client’s ERP System, resulting in streamlined payment processing, automatic reconciliation, and the availability of real-time reporting (the “**Services**”).

We access, collect, use and disclose information on a daily basis in order to provide the Services to our Bank Partners and, by extension, to their Business Clients. The confidentiality, privacy and security of all of the information we process, including personal information, is of utmost importance to us in terms of both our own ethical standards and legal obligations, as well as those of our Bank Partners and/or their Business Clients.

Purpose of the Code

This Personal Information Processing Code of Practice (“**Processing Code**”) addresses how FISPAN’s commitment to confidentiality, privacy and security of such personal information is implemented when FISPAN is acting as a processor on behalf of our Bank Partners and/or their Business Clients, in delivering our Services. This includes any personal information that FISPAN may process in connection with facilitating payment transactions involving a Bank Partner and its Business Client, and any related services.

The information that we primarily collect or access from each Business Client and/or their ERP System, and process on behalf of our Bank Partners and/or their Business Clients, is the non-personal information of the Business Clients and those parties with whom these Business Clients engage in payment transactions (each, a “**Payee**”); these are typically vendors, suppliers, contractors or providers to the Business Clients that issue bills or invoices for payment by the Business Client, but may be other types of Payees (e.g., employees of the Business Client being paid expenses). In some cases, the Payee is an individual, so the processing of personal information of that Payee (e.g. name, contact information, transaction information, financial account information, etc.) may be necessary to facilitate the payment and for related reasons

(e.g., information reporting and reconciliation). This is information that the Business Client would normally make available directly to the Bank Partner for such purposes.

We also collect information about the representatives of each Business Client, who may be employees, agents, contractors or service providers (such as accounting consultants and outsourcing providers), and who are involved in the demonstration and evaluation of the FISPAN Service, the onboarding onto the FISPAN Service, or its ongoing usage in production, and who interact with FISPAN as a result thereof (each, a “**Business Client Representative**”). The information that we collect about these Business Client Representatives is generally limited to their name, title, role and job function, and business contact information (e.g. email address, telephone number, mailing address, etc.).

Data Processing Authority

Our authority to process personal information comes from our Bank Partners and/or their Business Clients, as well as applicable law. Because we are processing personal information on behalf of our Bank Partners and their Business Clients, we are not permitted to do anything with personal information that we receive as a processor that our Bank Partners and/or their Business Clients themselves are not permitted to do.

In processing personal information, we rely on our Bank Partners’ and/or their Business Clients’ authority to collect, use and disclose that information.

Data Processing Purposes

As a processor, FISPAN collects (or accesses) and processes personal information on behalf of its Bank Partners and/or their Business Clients only in accordance with:

- the terms of our service agreement with a given Bank Partner (the “**Bank Service Agreement**”);
- the written instructions of the Bank Partner and/or their Business Clients issued pursuant to the Bank Service Agreement; and
- applicable law.

FISPAN processes personal information to provide the Services, which include supporting the Bank Partners and their Business Clients, and for the following ancillary purposes:

- to host, store and ensure the availability of the information (business continuity and disaster recovery);
- to monitor, administer and secure both the payment transactions engaged in by our Bank Partners and their Business Clients, and our network and systems

in general, including without limitation to monitor, detect, and prevent or remediate payment-related issues (e.g., payments that may be misdirected, lost or otherwise paid to the wrong person, or any payment-related error, inaccuracy, failure or delay) (each, a “**Payment Issue**”);

- to monitor, detect, and prevent or address fraud or improper or illegal activity;
- to exercise access control over our systems (e.g. identity authentication, etc.); and
- if necessary, to participate in investigations and/or legal proceedings involving our Bank Partners or their Business Clients.

In addition, in limited instances FISPAN also acts as a controller and processes personal information for its own purposes, including to enter into contracts with the Bank Partners and/or Business Clients, or to comply with legal and regulatory obligations. For further details on these processing activities, please see our Privacy Policy which is accessible [here](#).

Securing the Data we Process

FISPAN has implemented appropriate physical, administrative and technical safeguards in order to protect the data received for processing from unauthorized or unlawful access, use, modification, disclosure, loss, theft, disposal or destruction. These include safeguards to protect data both during transmission and while in storage.

We take steps to ensure that only authorized personnel who are aware of their and our privacy, security and confidentiality obligations are able to access personal information, and even then on a limited, need-to-know basis in light of the specific purposes for which we process the information.

Our subprocessors are only permitted to process personal information they receive from us where there is a contractual arrangement in place that imposes appropriate obligations and restrictions that enable us to comply with our own commitments to our Bank Partners and/or their Business Clients and with applicable law. Subprocessors are not permitted to collect, use, or disclose the personal information they receive from us for their own purposes.

Transparency and Cooperation

FISPAN will promptly notify the applicable Bank Partner (and/or Business Client, if applicable) of requests or complaints that we receive from individuals in connection with our processing of personal information under this Processing Code, and will cooperate with the Bank Partner (and Business Client, if applicable and permitted by

the applicable Bank Partner(s)) in responding to any such requests or complaints in accordance with the applicable service agreement and applicable law.

Updates

We may change this Processing Code at any time. We therefore encourage you to review this Processing Code whenever you visit the website to stay informed about how we handle personal information in our role as a processor.

The date on which this Code was most recently updated appears at the [top of this page](#).

Contact Us

To contact FISPAN about this Code, or to make a request or complaint, please reach out to us:

- Through our [website](#)
- By telephone: 604-424-9090
- By email: privacy.officer@fispan.com
- By mail: FISPAN Services, Inc.
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