

At Brilliance Financial Solutions Inc, accessible from [www.brilliancefsi.com](http://www.brilliancefsi.com), one of our main priorities is the privacy of our visitors. This Privacy Policy document contains types of information that is collected and recorded by Brilliance Financial Solutions Inc and how we use it.

If you have additional questions or require more information about our Privacy Policy, do not hesitate to contact us.

This Privacy Policy applies only to our online activities and is valid for visitors to our website with regards to the information that they shared and/or collect in Brilliance Financial Solutions. This policy is not applicable to any information collected offline or via channels other than this website.

We respect your privacy and are committed to protecting it through our compliance with this privacy policy (“Policy”). This Policy describes the types of information we may collect from you or that you may provide (“Personal Information”) on the [www.brilliancefsi.com](http://www.brilliancefsi.com) website (“Website”), “Brilliance Financial Solutions” mobile application (“Mobile Application”), and any of their related products and services (collectively, “Services”), and our practices for collecting, using, maintaining, protecting, and disclosing that Personal Information. It also describes the choices available to you regarding our use of your Personal Information and how you can access and update it.

This Policy is a legally binding agreement between you (“User”, “you” or “your”) and this Website operator and Mobile Application developer (“Operator”, “we”, “us” or “our”). If you are entering into this agreement on behalf of a business or other legal entity, you represent that you have the authority to bind such an entity to this agreement, in which case the terms “User”, “you” or “your” shall refer to such entity. If you do not have such authority, or if you do not agree with the terms of this agreement, you must not accept this agreement and may not access and use the Services. By accessing and using the Services, you acknowledge that you have read, understood, and agree to be bound by the terms of this Policy. This Policy does not apply to the practices of companies that we do not own or control, or to individuals that we do not employ or manage.

### Acceptance of this policy

You acknowledge that you have read this Policy and agree to all its terms and conditions. By accessing and using the Services and submitting your information you agree to be bound by this Policy. If you do not agree to abide by the terms of this Policy, you are not authorized to access or use the Services.

### Consent

By using our website, you hereby consent to our Privacy Policy and agree to its terms.

### Your Privacy Choices

You may withdraw your consent at any time (subject to legal or contractual obligations and on providing us reasonable notice) by contacting our Compliance Officer and Privacy Officer by email. Please be aware that withdrawing your consent may prevent us from providing you with the requested products or services. We may occasionally use your personal information to advise you of products or services we believe may be of interest to you or fit your personal circumstances. If you would rather not receive this type of communication, please contact us by email.

## PIPEDA’s 10 Principles

### 1. Accountability

All employees, associated advisors and suppliers who are granted access to client records understand the need to keep this information protected and confidential. They know they are to use the information only for the purposes intended. This expectation is clearly communicated. We’ve also established physical, and systems safeguards, along with proper processes, to protect client information from unauthorized access or use.

### 2. Identifying purposes

The personal information that you are asked to provide, and the reasons why you are asked to provide it, depends on the product or service you are requesting from Brilliance. Only with your permission by Brilliance we will collect and use your personal information for

- your application of our products and services
- updates about new products or services
- correspondence by email, phone, etc. to any questions, concerns, or inquiries

### 3. Consent

We will always ask you for permission before collecting, using or sharing your personal information.

### 4. Limiting collection

We only collect your personal information that are needed.

### 5. Limiting use, disclosure, and retention

#### Use

It depends on the product or service you are requesting from Brilliance Financial Solutions.

#### Disclosure

With Your consent, we may disclose Your personal information for any other purpose with Your consent.

**Business Transactions:** If Brilliance Financial Solutions is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

**Law enforcement:** Under certain circumstances, the Brilliance Financial Solutions may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

**For business transfers:** We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.

## With business partners

Brilliance Financial Solutions may share Your information with Our business partners to offer You certain products, services or promotions.

## With Affiliates

Brilliance Financial Solutions may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.

## With Service Providers

We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to contact You.

## Other legal requirements

Brilliance Financial Solutions may disclose Your Personal Data in the good faith belief that such action is necessary.

## For other purposes

We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing, and your experience.

## Retention

Brilliance Financial Solutions will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

Brilliance Financial Solutions will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Service, or We are legally obligated to retain this data for longer time periods.

## 6. Accuracy

Brilliance Financial Solutions will keep your Personal Information as accurate and up-to-date to fulfill the purposes for which it was collected. You may inform us for any modification of Your Personal Information if it is applicable to the service you have requested at any time.

## 7. Safeguards

Brilliance Financial Solutions secure information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use, or disclosure. We maintain reasonable administrative and technical safeguards to protect against unauthorized access, use, modification, and disclosure of personal Information in our control and custody. However, no data transmission over the Internet or wireless network can be guaranteed.

- We ensure that our locations are safe. We use locks, fire extinguishers, all paper files are kept in locked dressers (especially the files that contain your personal information).
- We have every office we have a clean desk policy; your personal information is forbidden to be removed from our offices. Only authorized staff has access to your Personal Information.
- We secure that our systems are programmed to scan for viruses and all our equipment is protected with passwords. The use of fax equipment and copy machines are located in protected places in our offices.

## How to protect Your information

- Never respond to unsolicited emails or website popups where you will be asked to provide personal information.
- Use Anti-Virus software to prevent computer viruses.
- Disconnect your internet if you do not need it.
- Use only secure browsers such as Firefox, Chrome, Safari, Internet Explorer, etc.
- Back up your files frequently.
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Therefore, while we strive to protect your Personal Information, you acknowledge that (i) there are security and privacy limitations of the Internet which are beyond our control; (ii) the security, integrity, and privacy of any and all information and data exchanged between you and the Services cannot be guaranteed; and (iii) any such information and data may be viewed or tampered with in transit by a third party, despite best efforts.

## 8. Openness

You have the right to know why an organization collects, uses or discloses your personal information.

## 9. Access

All employees, associated advisors and suppliers who are granted access to client records understand the need to keep this information protected and confidential. They know they are to use the information only for the purposes intended. This expectation is clearly communicated. We've also established physical, and systems safeguards, along with proper processes, to protect client information from unauthorized access or use.

## 10. Challenging compliance

You may contact us with any questions or concerns. Please see contact details in the section "contact us".

## Our Advertising Partners Privacy Policy

Some of advertisers on our site may use cookies and web beacons. Our advertising partners are listed below. Each of our advertising partners has their own Privacy Policy for their policies on user data. For easier access, we hyperlinked to their Privacy Policies below. Google <https://policies.google.com/technologies/ads>

## Advertising Partners Privacy Policies

You may consult this list to find the Privacy Policy for each of the advertising partners of Brilliance Financial Solutions.

Third-party ad servers or ad networks uses technologies like cookies, JavaScript, or Web Beacons that are used in their respective advertisements and links that appear on Brilliance Financial Solutions, which are sent directly to users' browser. They automatically receive your IP address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or to personalize the advertising content that you see on websites that you visit.

*Note that Brilliance Financial Solutions Inc has no access to or control over these cookies that are used by third-party advertisers.*

## Third Party Privacy Policies

Brilliance Financial Solutions Inc's Privacy Policy does not apply to other advertisers or websites. Thus, we are advising you to consult the respective Privacy Policies of these third-party ad servers for more detailed information. It may include their practices and instructions about how to opt-out of certain options.

You can choose to disable cookies through your individual browser options. To know more detailed information about cookie management with specific web browsers, it can be found at the browsers' respective websites.

## Children's Information

Another part of our priority is adding protection for children while using the internet. We encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity.

Brilliance Financial Solutions does not knowingly collect any Personal Identifiable Information from children under the age of 13. If you think that your child provided this kind of information on our website, we strongly encourage you to contact us immediately and we will do our best efforts to promptly remove such information from our records.

## Data breach

In the event we become aware that the security of the Services has been compromised or Users' Personal Information has been disclosed to unrelated third parties as a result of external activity, including, but not limited to, security attacks or fraud, we reserve the right to take reasonably appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and cooperation with law enforcement authorities in order to prevent future incidences.

When we do, we will send you an email, get in touch with you by phone, mail you a letter, or in person. We will not make any notifications on our website ([www.brilliancesfi.com](http://www.brilliancesfi.com)) nor make any notice public. (For example, magazine, newspaper, reporters, social media, etc.)

You may contact Brilliance Financial Solutions staff by email or phone to answer all related questions.

## Changes and amendments

Brilliance Financial Solutions reserves the right to modify this Privacy Policy or its terms related to the Services at any time at our discretion. By utilizing this site, you are consenting to be bound by the then current form of this Privacy Policy.

When we do, we will send you an email to notify you. We may also provide notice to you in other ways at our discretion, such as through the contact information you have provided.

An updated version of this Policy will be effective immediately upon the posting of the revised policy unless otherwise specified. Your continued use of the Services after the effective date of the revised Policy (or such other act specified at that time) will constitute your consent to those changes. However, we will not, without your consent, use your Personal Information in a manner materially different than what was stated at the time your Personal Information was collected.

## Contact Us

If you have any questions, concerns, or complaints regarding this Policy, the information we hold about you, or if you wish to exercise your rights, we encourage you to contact us using the details below:

Brilliance Financial Solutions Inc  
Jacinta Panganiban  
5700 avenue Victoria, sous-sol  
H3W 3H2, Montreal, Quebec  
Canada  
[jacinta.panganiban@brilliancesfi.com](mailto:jacinta.panganiban@brilliancesfi.com)

We will attempt to resolve complaints and disputes and make every reasonable effort to honor your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by applicable data protection laws.

The Privacy Policy was last revised on October 30, 2025.