



[We self-certify compliance with:](#)



## Safe Harbor Privacy Policy

### Introduction

Dollar Financial Group, Inc. is a leading international financial services company serving under-banked consumers. To meet the needs of these customers, Dollar Financial Group, Inc. provides a range of consumer financial products and services primarily consisting of check cashing, short-term consumer loans, money orders and money transfers as well as other conveniences such as utility bill payments, currency exchange, gold purchasing, pawn lending and tax preparation.

Protecting consumer privacy is important to Dollar Financial Group, Inc. Dollar Financial Group, Inc. and its affiliated subsidiaries (hereinafter collectively referred to as "Dollar Financial," "we," "us" or "our") adhere to the Safe Harbor Agreement concerning the transfer of personal information from the European Union ("EU") to the United States of America ("US"). Accordingly, we follow the Safe Harbor Principles published by the US Department of Commerce (the "Principles") with respect to all such data. If there is any conflict between the policies in this privacy policy and the Principles, the Principles shall govern.

This privacy policy outlines our general policy and practices for implementing the Principles, including the types of information we gather, how we use it and the notice and choice affected individuals have regarding our use of and their ability to correct that information. This privacy policy applies to all personal information received by Dollar Financial from the EU whether in electronic, paper or verbal format.

### Safe Harbor Principles of Privacy Policy

Dollar Financial hereby confirms our policy to protect and maintain the privacy of personal information that we collect and assemble. We certify that we comply with the "Safe Harbor" principles of the United States Department of Commerce, in relation to personal information collected in the EU. We endorse and follow the seven principles and practices outlined by the European Commission's Directive on Data Protection. These principles can be found at the US Department of Commerce website at <http://export.gov/safeharbor/>. Dollar Financial fulfills our obligations under the seven principles in the following manner:

**1. Notice** – Dollar Financial, through its EU subsidiaries, informs individuals about the purposes for which Dollar Financial collects and uses information about them, how to contact Dollar Financial with any inquiries or complaints, the types of third parties to which Dollar Financial discloses the information, and the choices and means Dollar Financial offers individuals for limiting its use and disclosure. Notice is provided in clear and conspicuous language when individuals are first asked to provide personal information to the organization or as soon thereafter as is practicable, but in any event before Dollar Financial (i) uses such information for a purpose other than that for which it was originally collected or (ii) discloses it for the first time to a third party.

**Purposes for Collection of Personal Information** – Dollar Financial subsidiaries in the EU collect personal information from customers, potential customers and employees and may share some or all of the personal information with Dollar Financial and its US subsidiaries for the following purposes:

1. **Financial Services** – To verify identity and credit standing and to qualify on-line and in-store applicants from the EU for consumer loans; to assess credit history of customers; to confirm

details of customer employment; to confirm the identity of a customer; and to detect, prevent, and investigate actual and potential fraud and related activities.

2. Collection – To collect on unpaid loans and debt that may become owed by a customer to Dollar Financial or one of its subsidiaries.
3. Analytics – To prepare statistical models and rules to assist Dollar Financial's EU subsidiaries in making consumer lending decisions.
4. Marketing – To develop, manage and market products and services to meet the needs of customers; to contact customers for products and services that may be of interest; to determine the eligibility of customers for different products and services that may be of interest.
5. HR Purposes (for employees only) – For personnel (payroll and contact information) and benefit administration; when the employee consents to such disclosure or disclosure is required by law; offer of employment and employment agreement; criminal record check and consumer credit reports; federal and state tax forms; to contact a previous employer, or personal references, or next of kin, in case of emergency; recognition purposes (Birthday, Anniversary or contests); purpose of licensing; disaster recovery purposes; performance management (reviews, appraisals, change of status forms); and to ensure employee safety and security as well as protection of company assets involving loss prevention initiatives.

In most instances, customers, potential customers and employees consent in advance to the sharing of their personal information for the purposes outlined above. In addition, Dollar Financial reserves the right to disclose an individual's personal information to affiliates or unaffiliated third parties if we believe in good faith that such disclosure is necessary: (a) to comply with the law or in response to a subpoena, court order, government request, or other legal process; (b) to protect the interests, rights, safety, or property of Dollar Financial or others; (c) to enforce any terms of service; (d) to provide an individual with the services or products requested by such individual (including allowing a purchaser of Dollar Financial or a subsidiary to continue to serve the individual), and to perform other activities related to such services and products, including billing and collection; (e) to provide an individual with information, special offers, or promotions from Dollar Financial to which the individual consented; or (f) to operate Dollar Financial's systems properly. Dollar Financial reserves the right to use and disclose all information that is not in individually identifiable form as we deem appropriate in our sole discretion.

Contact Information – Questions, comments or complaints regarding Dollar Financial's Safe Harbor Policy or data collection and processing practices can be mailed or emailed to:

Privacy Officer  
Dollar Financial Group, Inc.  
1436 Lancaster Ave., Suite 300  
Berwyn, PA 19312  
[Privacy.Officer@dfg.com](mailto:Privacy.Officer@dfg.com)

Sharing Information with Third Parties – Sometimes we will share personal information with third parties outside the Dollar Financial family of companies. We may do this for the following reasons:

- If an individual has given consent by choosing not to opt out, we may share some of the individual's information with carefully selected third parties so that they can provide the individual with information about products and services that may be of interest to the individual.
- We may share information with third parties that can provide identity verification and/or credit information required to assess credit risks.
- We may share an individual's information with third parties when we believe it is necessary to comply with the law or protect our or another person's rights, property or safety. This includes exchanging information with third parties to protect against fraud and reduce payment risks (see below).
- If there is (or is to be) any change in ownership of our business or assets then we may wish to share an individual's information so that the new owners may continue to operate our business effectively and

continue to provide services to our customers. This may include new shareholders or any organization that might take an assignment or transfer of any agreements we have entered into with our customers.

We will only deal with third parties that we trust to act in our customers' and employees' best interests and who treat our customers' and employees' information with the same stringent controls that we apply ourselves.

**2. Choice** – Dollar Financial offers individuals the opportunity to choose (opt out) whether their personal information is (a) to be disclosed to a third party or (b) to be used for a purpose that is incompatible with the purposes for which it was originally collected or subsequently authorized by the individual. Individuals are provided with clear and conspicuous, readily available, and affordable mechanisms to exercise choice. Where applicable, an individual may choose to opt out as described above by sending such opt-out request to:

Privacy Officer  
Dollar Financial Group, Inc.  
1436 Lancaster Ave., Suite 300  
Berwyn, PA 19312  
[Privacy.Officer@dfg.com](mailto:Privacy.Officer@dfg.com)

However, if the disclosure or use of the personal information is needed to process a financial transaction or employment application, such processing may be terminated if the individual opts out of such disclosure or use.

For any sensitive information (i.e. personal information specifying medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or information specifying the sex life of the individual), Dollar Financial gives individuals affirmative or explicit (opt in) choice if the information is to be disclosed to a third party or used for a purpose other than those for which it was originally collected or subsequently authorized by the individual through the exercise of opt in choice. In any case, Dollar Financial treats as sensitive any information received from a third party where the third party treats and identifies it as sensitive.

**3. Onward Transfers (Transfers to a Third Party)** – Prior to disclosing information to a third party, Dollar Financial will apply the Notice and Choice principles outlined in paragraphs 1 and 2 above. However, where Dollar Financial wishes to transfer information to a third party that is acting as an agent to perform tasks on behalf of and under the instructions of Dollar Financial, we may do so if we first either ascertain that the third party subscribes to the Principles or is subject to the Directive or another adequacy finding or enters into a written agreement with such third party requiring that the third party provide at least the same level of privacy protection as is required by the relevant Principles. If Dollar Financial complies with these requirements, Dollar Financial shall not be held responsible when a third party to which we transfer such information processes it in a way contrary to any restrictions or representations, unless Dollar Financial knew or should have known the third party would process it in such a contrary way and Dollar Financial has not taken reasonable steps to prevent or stop such processing.

**4. Security** – Dollar Financial takes reasonable precautions to protect personal information from loss, misuse and unauthorized access, disclosure, alteration and destruction. Dollar Financial has put in place appropriate physical, electronic and managerial procedures to safeguard and secure the personal information from loss, misuse, unauthorized access or disclosure, alteration or destruction.

**5. Data Integrity** – Dollar Financial does not process personal information in a way that is incompatible with the purposes for which it has been collected or subsequently authorized by the individual. To the extent necessary for those purposes, Dollar Financial takes reasonable steps to ensure that data is reliable for its intended use, accurate, complete, and current.

**6. Access** – Dollar Financial allows individuals to access their personal information and to be able to correct, amend, or delete that information where it is inaccurate, except where the burden or expense of

providing access would be disproportionate to the risks to the individual's privacy in the case in question, or where the rights of persons other than the individual would be violated.

Upon written request, and within a reasonable period of time, an individual will be informed of the existence, use, and disclosure of his or her personal information and will be given access to that information. An individual is entitled to comment on the accuracy and completeness of his or her personal information, and have that information amended where appropriate.

Dollar Financial will respond to an individual's request within a reasonable time period. The information will be made available within 40 days of the request. Individuals can seek access to their personal information by submitting a written request to the Privacy Officer as follows:

Privacy Officer  
Dollar Financial Group, Inc.  
1436 Lancaster Ave., Suite 300  
Berwyn, PA 19312  
[Privacy.Officer@dfg.com](mailto:Privacy.Officer@dfg.com)

An individual will be required to provide sufficient personal information to confirm his or her identity with Dollar Financial.

An individual will be able to challenge the accuracy and completeness of his or her personal information and have it amended as appropriate. Dollar Financial will amend personal information when an individual successfully demonstrates the inaccuracy or incompleteness of his or her personal information. Any unresolved disagreements relating to the accuracy and completeness of an individual's personal information will be noted for so long as such information remains relevant.

Dollar Financial may not be able to provide access to any or all individual personal information. If a request for personal information is denied, Dollar Financial will notify the individual in writing, documenting reasons for refusal and resources available for redress. Reasons for refusing access may include:

- That the personal information is unreasonably costly to provide;
- That the release of the personal information may threaten the life or security of a third party;
- That the personal information is subject to or generated in a formal dispute resolution process;
- That the personal information cannot be disclosed for legal, security, or commercial proprietary reasons; or
- That the personal information is subject to attorney-client or litigation privilege.

**7. Enforcement** – Dollar Financial uses a self-assessment approach to assure compliance with this privacy policy and periodically verifies that the policy is accurate, comprehensive for the information intended to be covered, prominently displayed, completely implemented and accessible and in conformity with the Principles. We encourage interested persons to raise any concerns using the contact information provided and we will investigate and attempt to resolve any complaints and disputes regarding use and disclosure of personal information in accordance with the Principles. If a complaint or dispute cannot be resolved through our internal process, we agree to dispute resolution using the European Data Protection Authorities as a third party resolution provider.

## Amendments

This privacy policy may be amended from time to time consistent with the requirements of the Safe Harbor. We will post any revised policy on [www.dfg.com](http://www.dfg.com).

## Information Subject to Other Policies

Dollar Financial is committed to following the Principles for all personal information within the scope of the Safe Harbor Agreement. However, certain information is subject to policies of Dollar Financial that may differ in some respects but offer no less protection than the general policies set forth in this privacy policy.