

PRIVACY POLICY

Fast Approved Autos

A division of Steeltown Ford Sales 1980 LTD

Effective Date: 2026/07/29

This Privacy Policy has been prepared as a working draft for review by qualified legal counsel prior to publication on the Fast Approved Autos website(s), including fastapprovedautos.ca. Bracketed items (e.g., [Insert Effective Date]) and shaded "Legal Review Note" boxes throughout this document flag information, confirmations, or legal judgment calls that should be finalized or verified before this policy goes live.

1. Introduction

Fast Approved Autos ("FAA", "we", "us", or "our") is a specialized vehicle sales and delivery team operating under Steeltown Ford Sales 1980 LTD, a licensed motor vehicle dealer. We sell new and pre-owned vehicles across all makes and models, with particular focus on delivering vehicles to customers in northern, remote, and First Nations communities across Canada, including Nunavut.

We are committed to protecting the privacy and security of the personal information of our customers, prospective customers, and website visitors. This Privacy Policy explains what personal information we collect, why we collect it, how we use and disclose it, and the choices and rights available to you.

This Policy applies to personal information collected through our website(s), by telephone, by text message, in person at our dealership, and through any other means by which you interact with FAA.

FAA is based in Manitoba and does not currently market to or deliver vehicles in Quebec. However, because privacy obligations can follow the individual rather than the organization's location, this Policy also addresses the additional protections that apply if you are a resident of Quebec (see Section 18), consistent with Quebec's Act respecting the protection of personal information in the private sector, as amended by Law 25.

2. Who We Are and How to Reach Us

Fast Approved Autos operates as a division of Steeltown Ford Sales 1980 LTD, the licensed dealership entity responsible for the sale and financing of vehicles. References to "FAA," "we," "us," and "our" in this Policy include Steeltown Ford Sales 1980 LTD where the context requires.

Business address: 933 Manitoba Ave, Selkirk, MB, Canada, R1A 3T7

General inquiries: 1-877-520-1544 / Info@fastapprovedautos.ca

3. Personal Information We Collect

The personal information we collect depends on how you interact with us (for example, browsing our website versus applying for financing). We may collect:

3.1 Identification and Contact Information

- Full name, date of birth, mailing and delivery address, phone number(s), and email address
- Community/region of residence, particularly for delivery logistics to remote or northern communities

3.2 Financial and Credit Information

- Information provided on credit or financing applications, such as employment and income information, banking information, and existing debts
- Credit history and credit bureau reports obtained through, or in connection with, financing applications submitted via DealerTrack Canada
- Trade-in vehicle information, including outstanding loan/lien balances

3.3 Identification Documents

- Driver's licence and other government-issued identification, where required for financing, insurance, or delivery verification purposes

3.4 Vehicle and Transaction Information

- Vehicle preferences, order details, VIN, and trade-in vehicle details
- Purchase, financing, warranty, and service records

3.5 Delivery and Logistics Information

- Delivery address and community details, shipping/sealift scheduling information, and delivery instructions or preferences

3.6 Communications

- Records and recordings of telephone calls with our sales and finance team (for quality assurance and training purposes)
- Text messages (SMS) exchanged with our team as part of our marketing or customer communications
- Emails, web chat, and social media messages (including Meta/Facebook Lead Ads submissions)

3.7 Website and Technical Information

- IP address, browser and device type, pages visited, referring website, and general location (city/region) inferred from your IP address
- Information collected via cookies and similar tracking technologies (see Section 9)

4. How We Collect Personal Information

We collect personal information:

- Directly from you, when you fill out a form on our website, request a quote, apply for financing, call or text us, or visit our dealership

- Automatically, through cookies, pixels, and similar tracking technologies when you visit our website or interact with our social media advertising
- From third parties, such as financial institutions and lenders (in connection with your financing application), credit bureaus, and referral sources
- Through lead-generation platforms and social media advertising (e.g., Meta/Facebook Lead Ads, Google Ads)

5. Why We Collect, Use, and Disclose Your Personal Information

We collect, use, and disclose personal information for the following purposes:

- To identify and communicate with you regarding a vehicle purchase, quote, or inquiry
- To assess and process financing and credit applications, including submitting applications to lenders and financial institutions through DealerTrack Canada
- To arrange and coordinate vehicle delivery, including specialized logistics for remote, northern, and First Nations communities (which may include coordinating with shipping and sealift carriers)
- To provide customer service, respond to inquiries, and manage our relationship with you
- To record calls for quality assurance, training, and dispute-resolution purposes
- To send marketing and promotional communications by email and SMS/text message, in accordance with Canada's Anti-Spam Legislation (CASL) (see Section 7)
- To measure and improve the performance of our website and advertising campaigns, including through analytics and remarketing tools
- To meet our legal, regulatory, tax, and contractual obligations, and to detect, prevent, or investigate fraud
- For any other purpose to which you consent, or as otherwise permitted or required by law

We do not sell your personal information to third parties for their own independent marketing purposes.

6. Consent

We seek your consent to collect, use, and disclose your personal information, except where we are permitted or required by law to do so without consent. Depending on the sensitivity of the information and the circumstances, your consent may be express (e.g., checking a box to receive marketing texts or signing a financing application) or implied (e.g., by your voluntary provision of information to request a quote).

You may withdraw your consent to our collection, use, or disclosure of your personal information at any time, subject to legal or contractual restrictions and reasonable notice, by contacting us using the information in Section 16. Withdrawing consent may limit our ability to provide certain services to you (for example, we cannot process a financing application without your consent to share information with lenders).

7. Marketing Communications (Email and SMS/Text)

Where you have provided consent, we may send you marketing communications by email and/or SMS/text message about vehicles, promotions, and dealership news. These communications are sent in accordance with Canada's Anti-Spam Legislation (CASL).

- Every marketing email and text will identify FAA as the sender and provide a way to contact us
- You may unsubscribe from marketing emails at any time using the "unsubscribe" link included in each message
- You may opt out of marketing text messages at any time by replying "STOP" to any message; message and data rates may apply, and message frequency varies
- Opting out of marketing communications will not affect transactional or service-related communications necessary to complete a transaction you have requested

8. Call Recording

Telephone calls with our sales and finance team may be recorded for quality assurance, training, and record-keeping purposes. Where calls are recorded, we provide notice at the outset of the call. If you do not wish to have your call recorded, please advise the representative you are speaking with.

9. Cookies and Similar Tracking Technologies

Our website uses cookies, pixels, and similar tracking technologies to operate the site, understand how visitors use it, and deliver relevant advertising. These technologies may include:

- Google Analytics and Google Ads (site performance measurement, conversion tracking, and remarketing)
- Meta (Facebook/Instagram) Pixel (advertising performance measurement and retargeting)
- Our customer relationship management and marketing platform, GoHighLevel (website analytics, lead form tracking, and email/SMS engagement tracking)

You can manage or disable cookies through your browser settings, and manage ad personalization through Google Ads Settings and Meta's Ad Preferences. Disabling cookies may affect the functionality of our website.

10. Disclosure to Third Parties and Service Providers

We may disclose your personal information to the following categories of third parties, only as needed for the purposes described in Section 5:

- Steeltown Ford Sales 1980 LTD, our affiliated licensed dealership entity
- Banks, credit unions, and other financial institutions and lenders to whom you apply for financing
- DealerTrack Canada Inc., which facilitates the electronic submission of financing applications to lenders
- Our dealer management system (DMS) provider, Tekion Corp

- Our customer relationship management and marketing platform, GoHighLevel [confirm operating legal entity name], and workflow automation provider, Zapier, Inc.
- Google LLC (Google Workspace, Google Ads, Google Analytics) and Meta Platforms, Inc. (Facebook/Instagram advertising)
- Third-party shipping, freight, and sealift carriers engaged to deliver vehicles to remote and northern communities
- Our professional advisors, including lawyers, accountants, and insurers, as needed
- Government authorities, law enforcement, or other parties where required or permitted by law, or to protect our legal rights

We require our service providers to protect personal information in a manner consistent with this Policy and applicable law, and to use it only for the purposes for which we have engaged them.

11. Cross-Border Storage and Transfer of Personal Information

Some of our service providers, including Google and Meta, and portions of our GoHighLevel marketing platform, store or process data on servers located outside Canada, including in the United States. As a result, your personal information may be subject to the laws of those jurisdictions, including lawful access requests by foreign courts, law enforcement, or government authorities. By providing your personal information to us, you acknowledge this possibility.

12. Data Retention

We retain personal information only for as long as necessary to fulfill the purposes for which it was collected, and thereafter as required to meet our legal, tax, financial, and regulatory record-keeping obligations, or to resolve disputes and enforce our agreements. When personal information is no longer required, we take reasonable steps to securely destroy, delete, or anonymize it.

13. Safeguarding Your Information

We use reasonable administrative, technical, and physical safeguards appropriate to the sensitivity of the information to protect personal information against unauthorized access, use, disclosure, alteration, or destruction. No method of transmission or storage is completely secure, and we cannot guarantee absolute security.

14. Accuracy of Your Information

We rely on you to provide accurate and complete personal information and to notify us of any changes. We take reasonable steps to ensure personal information is as accurate, complete, and up to date as necessary for the purposes for which it is used.

15. Your Privacy Rights

Subject to certain legal exceptions, you have the right to:

- Request access to the personal information we hold about you
- Request correction of inaccurate or incomplete personal information
- Withdraw your consent to certain collection, use, or disclosure of your personal information (see Section 6)
- Ask questions about our privacy practices or file a complaint

To exercise any of these rights, please contact us using the information in Section 16. We may need to verify your identity before responding, and we will respond within the time period required by applicable law.

16. How to Contact Us

If you have questions, requests, or concerns about this Privacy Policy or our privacy practices, please contact our Privacy Officer:

- Name/Title: Liam Sobering, Privacy Officer, Fast Approved Autos
- Email: [Insert Privacy Officer Email]
- Phone: [Insert Privacy Officer Phone]
- Mailing Address: [Insert Dealership Mailing Address, Winnipeg, MB]

This designation is made in accordance with both PIPEDA and, where applicable, Quebec's Law 25, which requires the person in charge of the protection of personal information to be named and their contact information made publicly available (see Section 18).

17. Complaints to the Regulator

If you are not satisfied with our response to a privacy concern, you have the right to file a complaint with the Office of the Privacy Commissioner of Canada (OPC), which oversees compliance with the Personal Information Protection and Electronic Documents Act (PIPEDA):

- Website: priv.gc.ca
- Toll-free: 1-800-282-1376

18. Additional Rights for Residents of Quebec

FAA does not currently market to or deliver vehicles in Quebec. This section is included as a precaution, since Quebec's Act respecting the protection of personal information in the private sector, as amended by Law 25, can apply based on where an individual resides, rather than where FAA operates — for example, if a Quebec resident visits our website or otherwise provides personal information to us. If you are a resident of Quebec, the following additional provisions apply.

18.1 Privacy Officer

Our Privacy Officer, named in Section 16, is responsible for overseeing our compliance with Quebec's private sector privacy law, including responding to access and correction requests and any privacy complaints from Quebec residents.

18.2 Enhanced Consent

Where we collect sensitive personal information (such as financial, credit, or government-identification information) from a Quebec resident, we will seek your express consent, presented separately from other terms, in clear and plain language.

18.3 Automated Decision-Making and Profiling

FAA's financing decisions are always reviewed by a person; we do not approve or decline financing applications using automated processing alone. If this changes in the future, we will inform affected individuals, explain the decision-making criteria, and provide an opportunity to submit comments and request human review, as required by law.

Our website uses technology (such as cookies and pixels described in Section 9) that can identify, locate, or profile visitors. You may disable these technologies through your browser or platform privacy settings as described in Section 9.

18.4 Cross-Border Transfers

As described in Section 11, some of our service providers store or process personal information outside Canada. Before communicating a Quebec resident's personal information outside Quebec, we will consider whether the information will receive protection consistent with applicable privacy principles, including through contractual or other safeguards, and will conduct a privacy impact assessment where required by law.

18.5 Additional Rights

In addition to the rights described in Section 15, Quebec residents may have the right to request portability of their computerized personal information in a structured, commonly used format, and, in certain circumstances, the right to request the de-indexation or cessation of dissemination of personal information.

18.6 Breach Notification

In the event of a confidentiality incident involving personal information that poses a risk of serious injury, we will notify Quebec's Commission d'accès à l'information (CAI) and affected individuals, and maintain an incident register, as required by law.

18.7 Complaints

Quebec residents may direct privacy complaints to our Privacy Officer (Section 16) or to the Commission d'accès à l'information du Québec (cai.gouv.qc.ca).

19. Children's Privacy

Our website and services are not directed at, and we do not knowingly collect personal information from, individuals who are not of the legal age of majority in their province or territory of residence. Our services are intended for individuals who are legally able to enter into a vehicle purchase or financing agreement.

20. Third-Party Links

Our website may contain links to third-party websites, including lender or manufacturer websites. We are not responsible for the privacy practices or content of third-party websites. We encourage you to review the privacy policy of any third-party website you visit.

21. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. The "Effective Date" at the top of this Policy indicates when it was last updated. We encourage you to review this Policy periodically.

Summary of Items Flagged for Legal Review

- Confirm business/ mailing address, Privacy Officer email/phone, and general contact information to be inserted throughout
- Confirm current status of Manitoba's PIPITPA and continued applicability of PIPEDA (Section 17)
- Confirm SMS/email marketing consent capture, opt-in/opt-out mechanics, and CASL/CRTC compliance language (Section 7)
- Confirm call recording notice/disclosure script and retention period (Section 8)
- Confirm specific data retention periods for financing, tax, and transaction records (Section 12)
- Confirm legal entity names for all listed service providers (e.g., GoHighLevel/HighLevel Inc., DealerTrack Canada Inc.) (Sections 10–11)
- Confirm whether a Privacy Impact Assessment or additional safeguards are warranted given the volume of financial/credit information handled
- Complete and publish a written designation of Liam Sobering as Privacy Officer, satisfying both PIPEDA and Quebec Law 25 requirements (Sections 16, 18.1)
- Confirm timing: whether a French-language version of the site/policy is needed now for incidental Quebec visitors, or only once FAA actively markets in Quebec (Section 18)
- Confirm whether a documented Privacy Impact Assessment is warranted now for existing cross-border transfers via Google, Meta, and GoHighLevel, given 2026 amendments tightening Law 25 cross-border requirements (Section 18.4)