

Privacy Officer Designation

Privacy Officer Designation: Orbiq

Effective Date: April 13, 2026

Document Status: Version 1.0 (Official)

Jurisdiction: Ontario, Canada

1. Formal Appointment

As of the effective date above, **FINARO CAPITAL SERVICES INC.** (the "Company"), a corporation incorporated in Canada and the owner and operator of **Orbiq**, hereby designates **Sumeet Chaurasia** as the **Privacy Officer** (also referred to as the "Chief Privacy Officer" or "Data Protection Officer") for all operations related to the Orbiq application. The Privacy Officer acts on behalf of, and reports to, FINARO CAPITAL SERVICES INC. as the data controller.

2. Statutory Authority

This designation is made to ensure compliance with the **Personal Information Protection and Electronic Documents Act (PIPEDA)** and relevant provincial privacy legislation in Canada. This role is responsible for overseeing Orbiq's adherence to the 10 Fair Information Principles.

3. Scope of Responsibilities

The Privacy Officer is accountable for the following:

- **Policy Development:** Maintaining and updating the Orbiq Privacy Policy, Data Classification Policy, and Incident Response Plan.
- **Access Requests (DSAR):** Serving as the primary point of contact for users wishing to access, correct, or delete their personal information.
- **Security Oversight:** Ensuring that technical safeguards (e.g., Cloud SQL CMEK encryption, Secret Manager, RLS, log retention) are functioning as described in the Information Security Policy and SecOps documentation.
- **Third-Party Risk:** Reviewing and maintaining Data Processing Addendums (DPAs) with service providers such as **Plaid Inc.**, **Groq Inc.**, **Stripe**, and **Google Cloud**.
- **Breach Notification:** Managing the mandatory 72-hour notification window to the Office of the Privacy Commissioner of Canada (OPC) in the event of a significant data breach.
- **Staff Training:** Ensuring that any future employees or contractors are trained on Orbiq's data handling and sanitization procedures.

4. Contact Information

Correspondence regarding privacy matters should be directed to the Privacy Officer via the following channels:

- **Email:** support@orbiq.online
- **Business Address:** Toronto, Ontario, Canada. Full address provided on request for service of legal process.

5. Attestation

By committing this document to the Orbiq Governance Repository, the Company appoints the Privacy Officer named below, and the Privacy Officer accepts the responsibilities of the role and commits to the protection of user data through "Privacy by Design."

Appointed by (for FINARO CAPITAL SERVICES INC.): _____ — Authorized Officer / Director

Accepted by: *Sumeet Chaurasia* — Privacy Officer, FINARO CAPITAL SERVICES INC. (Orbiq)