

HARLEY-DAVIDSON FINANCIAL SERVICES CANADA, INC.

Privacy Policy

Effective Date: June 2020

Last Modified: April 20, 2026

This privacy policy governs the actions of Harley-Davidson Financial Services Canada, Inc. (referred to below as “HDFSC”, “we” or “us”), and of its Affiliates (as defined below) and service providers, as they relate to the collection, use and disclosure of your personally identifiable information (“**Personal Information**”). Our privacy policy is based upon the values set by Canada’s *Personal Information Protection and Electronic Documents Act* (“**PIPEDA**”) and substantially similar provincial laws in Alberta, British Columbia and Quebec.

For the purposes of this policy, HDFSC’s “Affiliates” include Harley-Davidson, Inc., Harley-Davidson Motor Company, Harley-Davidson Financial Services, Inc., Harley-Davidson Credit Corp., and Eaglemark Savings Bank.

Our privacy policy may be amended from time to time. Please visit our website at <https://creditapplication.harley-davidson.com/ca/en/privacy> or contact our Privacy Officer, as described in [Section 12](#) below, for the most up-to-date version of this privacy policy.

1. Types of Personal Information Collected

HDFSC, its Affiliates and/or service providers, may collect the following Personal Information about you:

- When you visit our website, we may collect information about your device and browsing habits via cookies and other tracking technologies, as outlined in [Section 7](#) below.
- When you apply for credit, we may collect your name, address, how long you have lived at your current address, your housing/residence status (e.g., whether you own or rent), your monthly residence payment, phone number, email address, mailing address, ID numbers (including driver’s license and Social Insurance Number), trade-in vehicle information (including financing details related to any vehicle being traded in), and vehicle/asset information (including make, model, and year of primary and secondary assets such as sidecars, engines, and trailers), date of birth, current income, income frequency, references (names, addresses, phone numbers, relationship to you), and employment information (job title, name of your current employer, employer’s address and phone number, occupation and length of service);
- Credit-related information that you provide to us or our Affiliates or service providers in order to assess your eligibility for and provide our financial services and products, including bank account activity, bank account balances, consumer credit reporting bureau information (credit scores, payment history, number and amount of trade lines, delinquencies, judicial actions related to debt including bankruptcies, collections, repossessions) and purchase history;
- When you apply for credit, we may also collect Personal Information about you from credit bureaus and credit reporting agencies (such as credit scores, credit inquiries, and other information contained in consumer reports or related credit products). Where required by applicable law, we will obtain this information only after we receive your express consent (for example, by signing an application in the dealership, by submitting an online application, or by providing other written authorization). Please note that submitting an application to HDFSC for a loan may impact your credit as a "hard inquiry" or "hard credit check";
- When you apply for credit, we may contact your references (including past employers or other references you provide) in order to verify the information you submitted in connection with your credit application; and
- Any other Personal Information you voluntarily disclose to us during the course of inquiring about, applying for or utilizing our products or services.

Other information may be collected about you and used to market Harley-Davidson products or services based upon your visits to <https://creditapplication.harley-davidson.com/ca/en> (the “**Website**”). Please see [Section 7](#) below and HDFSC’s [Cookie Policy](#) for more information.

We may also collect information about you when you speak to us by telephone, including identification and contact information, and any Personal Information you offer or reveal during our conversation.

2. How Collection Occurs

HDFSC may collect your Personal Information at the time you make inquiries about or apply for our products and services (including by filing a loan or financing application through our Website) or otherwise communicate with our customer service or sales teams.

We may also collect your Personal Information by recording both incoming and outgoing telephone calls.

HDFSC, its Affiliates and/or service providers may also collect your Personal Information from third parties, including those you list as references in your application for our products and services, your employer, your landlord or mortgage holder, your bank, and credit reporting agencies or bureaus. By applying for our products and/or services, you agree that HDFSC, its Affiliates and service providers may obtain such information about you from third parties, and you authorize these sources to release this

information to HDFSC, its Affiliates and service providers.

Information about Website visitors is also collected through the use of cookies, as described further in [Section 7](#) below and HDFSC's [Cookie Policy](#).

3. Purposes

HDFSC, its Affiliates and/or service providers collect, use and disclose your Personal Information to (a) establish your identity; (b) assess your current and ongoing financial, personal and professional situation (including confirming your employment and residence status); (c) assess your eligibility for our products or services (for example, to process your application for credit); (d) make a decision about your eligibility for our products or services; (e) provide you with the product or service you have requested (if approved); (f) administer, monitor, evaluate and service any loan or credit agreement and collect any amounts owing to HDFSC or its Affiliates; (g) assign, whether as security or otherwise, any or all of HDFSC's right, title and interest in respect of your loan or credit application and agreement, and all documentation relating thereto; (h) where permitted by applicable law, promote, determine your eligibility for, and communicate with you in respect of other products and services we believe may be of interest to you; (i) provide customer service and communicate with you in respect of your application, products and services, including responding to your inquiries; (j) for other reasonable purposes related to managing HDFSC's business, including to meet legal and regulatory requirements, protect you and HDFSC from fraud and error, and maintain business records; and (k) otherwise as permitted or required by applicable law.

Telephone calls made to HDFSC may also be recorded, used, or disclosed to monitor and ensure the quality of customer service, resolve disputes, train and develop HDFSC's staff, and as otherwise permitted or required by applicable law.

Information collected about visitors to the Website may be used to evaluate the design, content, navigation, use and functionality of the Website, to better tailor visitors' experience when using the Website, to compile data about Website usage and patterns, and to deliver advertisements relevant to visitors' use of the Website and other Internet browsing activities. For more information, please see [Section 7](#) below and HDFSC's [Cookie Policy](#).

Information collected about those who sign up to receive our marketing communications shall be used to determine which marketing communications may be of interest to you and to send you those communications, including news about our products, services, events and other announcements.

The purposes for which we collect Personal Information will be identified before or at the time we collect the information. In certain circumstances, the purposes for which Personal Information is collected may be clear, and your consent may be implied.

4. Consent

Consent for the collection, use and disclosure of Personal Information may be expressly given or implied. Your express consent may be given in writing, verbally or through electronic means. Your implied consent may be given through an action you have taken, such as supplying your Personal Information for a specified purpose or speaking to us on the telephone. Each time you provide your Personal Information to HDFSC, or its Affiliates or service providers, you consent to the collection, use and disclosure of such information in accordance with this privacy policy.

Providing us with your Personal Information is always your choice. However, your decision not to provide certain information may limit our ability to assess your eligibility for or to provide you with our products or services. HDFSC will not require you to consent to the collection, use or disclosure of your Personal Information as a condition of supplying you with a product or service, except as required to be able to supply the product or service or as required by law.

5. Use and Disclosure

Personal Information will only be used or disclosed for the purpose(s) for which it was collected, unless you have otherwise consented, or when use or disclosure is required or permitted by law. We will not disclose your Personal Information to any third party, except as set out below:

Employees

Your Personal Information will be accessible to employees of HDFSC and its Affiliates, including employees in the sales, marketing, customer service, loan origination, underwriting, funding, servicing, administration (management, compliance, risk, internal audit, accounting), and information services departments who have a need to know such information for the purposes outlined above.

Third Party Services

There are certain services supplied to us by third parties, which may require that we share your Personal Information with third party service providers or allow them to collect or access Personal Information for the same purposes that we collect, use and disclose your Personal Information, as outlined in this privacy policy. These third party service providers are contractually obligated to protect your privacy. For example, HDFSC currently engages third parties in each Province of Canada and outside of Canada to provide the following services:

- Technology, security, and communications service providers to host and store data, to provide backup, disaster recovery, cybersecurity, and incident responses;
- Fraud prevention, identity verification, and compliance providers to detect fraud, screen for anti-money laundering

activities, and provide compliance monitoring;

- Insurance and protection products service providers to administer or support insurance or offer protection products;
- Cloud storage platform providers to store and protect the shared Personal Information;
- Customer service and communication providers to support and manage written and oral communication, to operate call center functions, and (where permitted by law) call recording and quality assurance;
- Credit origination and underwriting services to receive and process applications, to run underwriting and origination workflows and decision-making, to verify and evaluate applicant information, and to obtain and assess creditworthiness information;
- Credit reporting and account performance services to provide credit reporting file preparation, formatting, validation, and transmission; to report account status and payment history to consumer reporting agencies/credit bureaus; to receive and process updates relevant to servicing, risk monitoring, and compliance;
- Record destruction service providers to support secure destruction or disposal of Personal Information at the end of applicable retention periods, including secure transportation and shredding of paper records;
- Collection and repossession agents (including bailiffs and skip tracers) to locate collateral and/or the borrower, communicate with the borrower and reclaim collateral (where applicable);
- Transporters to transport the collateral;
- Appraisers to appraise the collateral;
- Professional advisors and administrative service providers, such as lawyers, accountants, auditors, consultants, and other professional advisors, to support our operations, legal obligations, regulatory guidance, industry standards, and risk management; and
- Marketing service providers (as applicable) to help us deliver account-related communications, special offers, promotions, new products, and experiences, consistent with your provided choices and to the extent allowed by law and in light of the commercial relationship between us. You may opt out of receiving marketing materials at any time by writing to HDFSC's Privacy Officer at P.O. Box 21489, Carson City, NV 89721-1489, U.S.A., by sending an email to PrivacyOfficer@HDFSI.com, or by following the unsubscribe instructions provided in any electronic message.

We may use other third-party service providers from time to time. We will endeavor to keep this privacy policy accurate and up-to-date.

For more information about the specific third parties that we currently engage with respect to the above services, please contact our Privacy Officer, as described in [Section 12](#) below.

HDFSC also engages third party data analytics and marketing service providers, who use cookies to target certain advertisements to be sent or directed to Website visitors, based on the pages, topics or links they have shown an interest in. For more information about the specific third parties engaged by HDFSC to perform such services, please see the [Cookie Policy](#).

Independent Dealerships

HDFSC may also share your Personal Information with independent Harley-Davidson dealerships for the purposes of processing your loan application as well as selling or advertising their products and services. In some cases, we may collect Personal Information on behalf of independent Harley-Davidson dealerships to facilitate their business operations. Each independently owned Harley-Davidson dealership has their own privacy policy which governs how they handle your Personal Information. You should contact the independently owned Harley-Davidson dealership for their privacy policy and practices.

Affiliates

HDFSC may share your Personal Information with its Affiliates (as defined above), who will only use such Personal Information for the same purposes as we do.

Legal Requirements

There are a number of other circumstances where HDFSC may collect, use or disclose Personal Information without notice or consent when required or permitted by law or lawful authority.

From time to time, we may be compelled by legal action to release information (e.g. statutory reporting requirement, search warrant, court order, bankruptcy or insolvency proceedings or other legally binding requests).

We may also disclose Personal Information without consent if it is to be used in an emergency that threatens the life, health or security of the individual, when investigating a potential breach of contract or law, or when collecting unpaid amounts owed or owing to us.

Business Transactions

We may disclose Personal Information to a buyer, current or prospective investors, or other successor in the event of a merger,

amalgamation, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets or existing contracts, in accordance with applicable law.

6. International Transfer of Personal Information

We use service providers located in Canada and the United States, or elsewhere outside of Canada, to collect and process some Personal Information on our behalf. Some of our Affiliates are also headquartered outside of Canada, including in the United States. Accordingly, your Personal Information may be transferred outside of Canada to a country that does not have the same data protection laws as Canada. If you live in Quebec, your Personal Information may be communicated to entities outside of Quebec. Such Personal Information will be subject to the legal requirements of the applicable foreign jurisdiction(s) and may be accessible to courts, law enforcement and national security authorities in each jurisdiction where it is accessed, processed and stored. To obtain written information about our policies and practices relating to our service providers outside of Canada, including the countries outside of Canada in which collection, use, disclosure or storage may occur and the purposes for which such service providers are authorized to process Personal Information on our behalf, please contact our Privacy Officer, as described in [Section 12](#) below.

7. Our Website Cookies

Our Website uses first- and third-party cookies. A cookie is a small computer file or piece of information that may be stored in your computer's hard drive when you visit our Website. We use cookies to improve our Website's functionality and, in some cases, to provide visitors with customized online experience. HDFSC (and third-party service providers acting on our behalf) also employ tracking technologies (including cookies and pixel tags) on our Website in order to provide tailored advertisements on HDFSC's behalf and on behalf of other advertisers across the Internet. HDFSC and its service providers may collect information about your activity on our Website and other websites, as well as your interaction with our advertising and other communications, and use this information to determine which advertisements you see on websites and applications. Some of these third-party service providers collect information on our behalf for analytics and advertising purposes.

Most web browsers are configured initially to accept cookies automatically. You may be able to change your Internet browser or device settings to prevent your computer from accepting cookies or to notify you when you receive a cookie so that you may decline its acceptance. Please refer to the documentation for your browser or device regarding how to allow or refuse cookies. Please note, however, that if you disable cookies, you may not experience optimal performance by our Website. In particular, if cookies are completely disabled, you will not be able to fill out the online version of the credit application. You may contact your local Harley-Davidson dealership to obtain a paper copy of the loan application instead.

For more information about HDFSC's use of cookies, including the type of information they collect, how that information is used, and the service providers involved in collecting, using and processing such information, together with how to opt-out, please review our [Cookie Policy](#).

8. Other Websites

Our Website may contain links to other third party websites that are not governed by this privacy policy. Although we endeavour to only link to sites with high privacy standards, our privacy policy will no longer apply once you leave our Website. Therefore, we suggest that you examine the privacy statements of any third party websites to learn how your information may be collected, used, stored and disclosed.

9. Not Intended for Children

Our Website is not intended for children under the age of 18. We do not knowingly collect data relating to children. If you are under the age of 18, do not use or provide information on this Website. If you are aware of information about children provided to HDFSC, please let us know, and we will take steps to remove the information.

10. Storage, Safeguarding & Retention of Customer Information

Personal Information will be protected using physical, technological and organizational safeguards that are designed to secure Personal Information from accidental loss or theft and from unauthorized use, access, disclosure, alteration and destruction. We use Secure Sockets Layer (SSL) technology to protect your information as it is transmitted to us. We also employ user authentication procedures and other preventative technologies designed to keep your data secure and protected. Access to Personal Information stored by us is limited to authorized HDFSC and Affiliates' personnel who require access to perform their job functions, and to authorized third parties that are contractually required to keep your information confidential and secure.

Please note, however, that no method of transmitting or storing Personal Information online is completely secure. As a result, while we strive to protect your Personal Information, you should be aware that there are security and privacy limitations of the Internet which are beyond our control. The security, integrity and privacy of any and all information and data exchanged between you and us through our Website, by email or other electronic means cannot be guaranteed, and any such information and data may be viewed or tampered with in transit by a third party. You are responsible for taking all reasonable steps to protect your Customer Account ID and password. Please store these in a safe location and do not share them with any third party.

Personal Information will only be retained by HDFSC for the period of time required to fulfill the purpose for which we collected it or as may be required or permitted by law. Under some circumstances, we may anonymize your Personal Information so that it can no longer be associated with you. We reserve the right to use such anonymous and de-identified data for any legitimate business purpose without further notice to you or your consent.

Roles and Responsibilities

Our Privacy Officer has overall responsibility for our compliance with applicable privacy laws, including responsibility for the day-to-day administration and implementation of our privacy program, such as developing and delivering privacy training to relevant personnel, establishing and publishing relevant policies and procedures, investigating and responding to complaints and potential violations of our privacy policies or relevant laws, responding to requests from individuals to exercise their rights under applicable privacy laws, and regularly reviewing and identifying opportunities to improve our privacy program.

Our Chief Information Security Officer is responsible for preparing a written information security program, assisting with breach prevention, response and containment, and evaluating and implementing information security controls.

In addition, all HDFSC personnel are responsible for: protecting the confidentiality and security of any Personal Information they handle in connection with their employment or engagement; following our security measures and policies and procedures for handling Personal Information; refraining from any unauthorized access, use or disclosure of Personal Information; facilitating data subject requests; and reporting security or confidentiality incidents.

11. Access to Your Information

Upon request, you will be informed of the existence, use and disclosure of your Personal Information, and may be given access to your Personal Information. You may also verify the accuracy and completeness of your Personal Information and may request that it be amended. Such a request must be in writing and should be sent to our Privacy Officer, as described in [Section 12](#) below.

Access to your Personal Information will generally be provided free of charge. However, if you request that information be copied or transmitted to you, we may charge a reasonable fee where permitted by applicable law.

In some circumstances, HDFSC may decline or be unable to provide access to some or all of the Personal Information that we hold about you, where permitted or required by applicable law. For example, HDFSC may not disclose information relating to you if the Personal Information of other individuals is referenced or if there are legal, security or commercial proprietary restrictions. If we do not provide you with access, we will generally provide you with an explanation as to why.

If you are located in Quebec, you may also have the right to request that we send you or another person or body a portable copy of your Personal Information, subject to certain limitations under applicable laws.

12. Resolving Your Questions and Concerns

HDFSC has designated an individual who is responsible for compliance with this privacy policy. You may contact our Privacy Officer to:

- a. Access Personal Information about you that is held by HDFSC (subject to certain exceptions under applicable laws);
- b. Review, verify, correct or update your Personal Information;
- c. Ask any questions or raise any concerns about our privacy policy, the handling of your Personal Information, or our privacy or data protection practices;
- d. Obtain written information about HDFSC's policies and practices relating to its Affiliates and service providers outside of Canada;
- e. Withdraw your consent to the continued collection, use or disclosure of your Personal Information; and/or
- f. Request a copy of the most up-to-date version of this privacy policy.

You may refuse or withdraw your consent to the collection, use and disclosure of your Personal Information at any time except when that Personal Information has been collected and is required to service your account with HDFSC or Affiliate for the product and service provided to you. If you do withdraw consent, HDFSC may not be able to provide you with or continue to provide you with some products, services or information, which may be of value to you. You may also, at any time, withdraw your consent for HDFSC to share your Personal Information with HDFSC's Affiliates or third parties including the independent Harley-Davidson dealerships or other third parties who provide Harley-Davidson branded products or services (insurance, visa card, etc.), however, if your consent is withdrawn they may not be able to provide the services and/or products you have requested.

To withdraw your consent:

Email the Privacy Officer:
Call Rider Services:

PrivacyOfficer@HDFSI.com
1-866-816-5820

Privacy questions or concerns?

Email the Privacy Officer:

PrivacyOfficer@HDFSI.com

Mail questions or concerns:

Harley-Davidson Financial Services,
Attention: Privacy Officer,
P.O. Box 21489
Carson City, Nevada 89721-1489

Emails and letters should include your name, address, email or phone number to ensure that we can promptly identify you and respond to your request.

We will investigate any privacy complaints and take appropriate remedial measures in accordance with applicable laws.

13. Changes to this Policy

We may need to change this privacy policy from time to time. When we do, we will post the updated privacy policy on our Website at <https://creditapplication.harley-davidson.com/ca/en/privacy> and will revise the “last updated” date appearing above. We will also mail a copy of the updated privacy policy to you via mail or email if you have agreed to receive electronic mail, or where otherwise permitted by applicable law.

When we are able to do so, we will generally notify affected individuals of material changes to this privacy policy which involve new or revised uses or disclosures of their Personal Information that may not be reasonably expected by them at the time that they provide us with their Personal Information.

However, we encourage you to review our privacy policy from time to time in order to check for updates and refresh your understanding of our Personal Information handling policies and practices. By providing us with your Personal Information, you acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of any modifications.