

Québec Marketing Guidelines

Affirm Canada

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QC Marketing Guidelines

Introduction

As a consumer lender, Affirm Canada Holdings, Ltd. (“Affirm”) is subject to the applicable consumer protection laws and regulations in each province of Canada.

As a merchant provider of Affirm’s lending services, your advertising and disclosures must also meet the requirements under applicable consumer protection law. Québec’s consumer protection regulations differ significantly from those of other provinces. These requirements are set out in **Québec’s Consumer Protection Act, Chapter P-40.1 (the “Act”)** and the Regulation respecting the application of the **Consumer Protection Act, Chapter P-40.1, r. 3 (the “Regulation”)**.

The information presented in these guidelines is intended to help you understand Québec’s requirements. It is provided for informational purposes only and does not constitute legal advice, nor is it an exhaustive listing of your compliance obligations in Québec. These guidelines summarize four principles which Affirm urges you consider carefully. It’s recommended that all merchants obtain legal advice as appropriate to ensure compliance with Québec regulatory requirements.

Please send all proposed marketing materials, including banners, landing pages, and messaging, to Affirm for review before deploying them on your website.

The Act draws an important distinction between advertisements for goods and services and an advertisement concerning credit.

An advertisement for goods or services is a message designed to promote goods or services in Québec.

Examples: Website homepage, product display page, email campaign, Instagram story, etc.

Sólstice Women Men Home Beauty

Textured Double Breasted Blazer
\$120

This double-breasted blazer is made from a textured cotton-linen blend out of Italy. It's tailored with a peak lapel.

Credit available from **affirm**

XS S M L XL



Add to bag

Details —
This double-breasted blazer is made from a textured cotton-linen blend out of Italy. It's tailored with a peak lapel.

Fabric and Care +

Sustainability +

Your Order

	Textured Blazer Size: XS Quantity: 1	\$120.00
	Portrero Skirt Size: XS Quantity: 1	\$80.00

PAYMENT METHOD

Credit available with **affirm**

An advertisement concerning credit is a message designed to promote the availability of credit.

Examples: Website financing page, website modal that only describes financing terms, price transformation showing installment payment amount, mention of financing in email, mention of financing on website, etc.

The image shows a tablet displaying a website for 'Solstice'. A modal window is open, advertising financing options for a record player. The modal is titled 'affirm + Solstice' and features the heading 'Pay in 4 (bi-weekly Installments)'. Below this, it says 'Choose Affirm at checkout' and lists three benefits: 'No interest or fees', 'Automatic payments', and 'No impact on credit score'. At the bottom of the modal, there is a 'HOW IT WORKS' section with a table of financial details.

HOW IT WORKS					
PURCHASE AMOUNT	INSTANT SAVINGS	# OF PAYMENTS	TOTAL PAYMENT AMOUNT	CREDIT RATE OFFER	TOTAL COST OF PURCHASE
\$200	\$0	4	\$200	0%	\$0

As the following Guidelines illustrate in greater detail, the Act prohibits the commingling of elements of these two types of advertisements.

With only one narrow exception (see **Guideline 1**), advertisements for goods or services **cannot include** any elements related to credit, such as an interest rate, payment amount, or statements like **'Buy Now, Pay Later.'**

Likewise, an advertisement concerning credit **cannot include** an illustration of goods or services, or messages encouraging the customer to purchase using credit.



QUÉBEC MARKETING GUIDELINES

Advertisements for Goods and Services

The following Guidelines describe the rules relating to
advertisements for goods and services.

Guideline 1

On a page or advertisement for goods or services (for example, a product detail page), financing can only be marketed with a statement such as “Credit available from Affirm.”

This means a price transformation (installment payment amount) cannot be displayed on a product detail page.

Relevant sections of the Québec Consumer Protection Act:

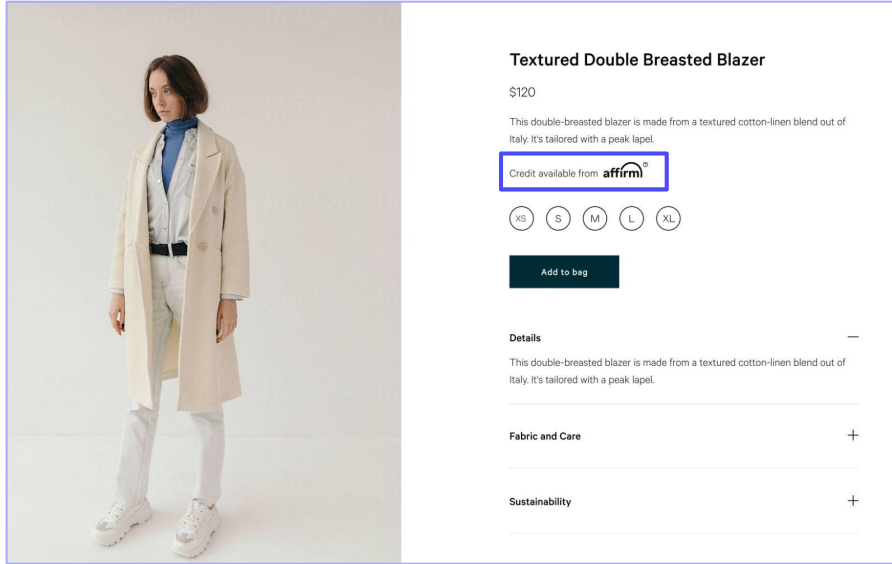
244: No person may in any advertisement of goods or services, advise consumers of the credit offered to them except to mention the availability of credit in the manner prescribed by regulation.

Regulation 3, Section 80.

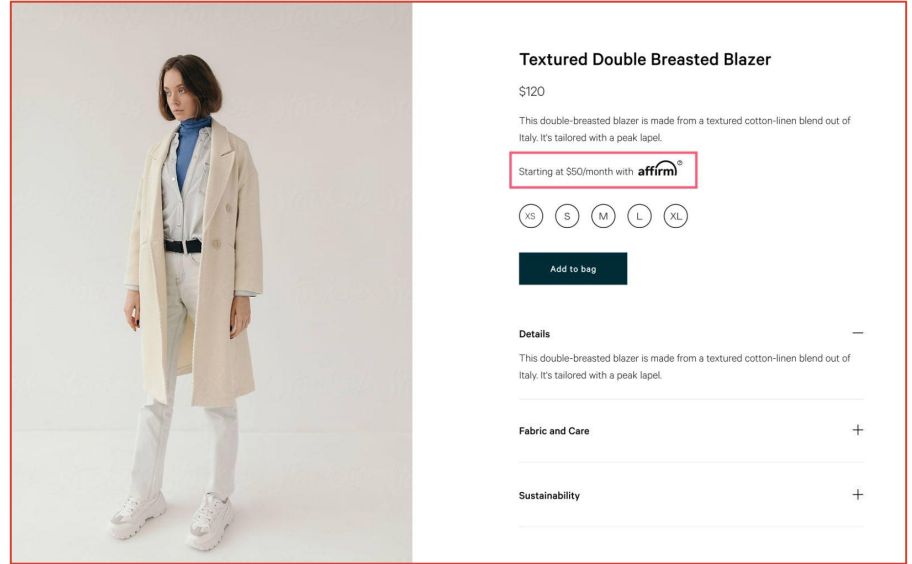
An advertisement for goods or services informing the consumer of the credit offered him may mention the availability of credit one or more of the following ways only:

- (a) by indicating the name, trademark or corporate symbol of a merchant who enters into contracts of credit;
- (b) by using the expression “credit offered”, “credit accepted” or “credit available”;
- (c) by illustrating a credit card

Guideline 1 | Example



“Credit available from Affirm”



The mention of “starting at \$ / month” is noncompliant

ADVERTISEMENTS FOR GOODS AND SERVICES

Guideline 2

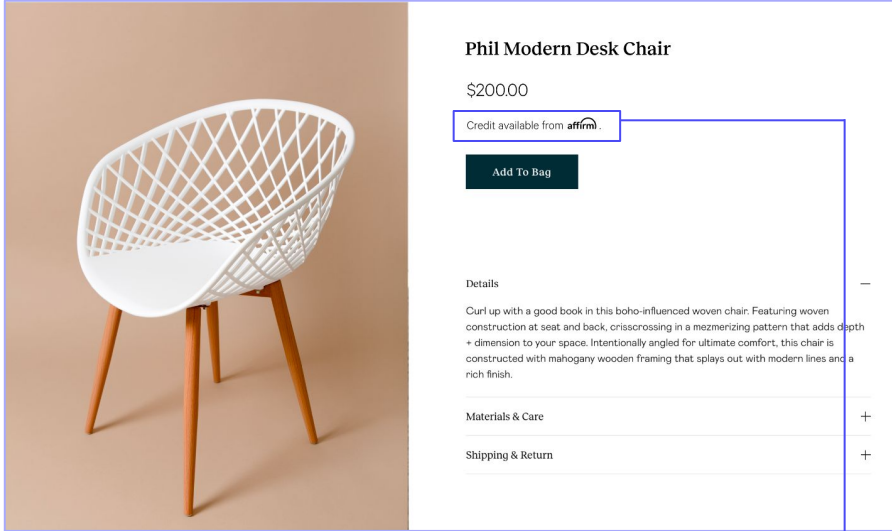
In an advertisement, the mention of financing has to be less prominent than the goods or services.

Relevant sections of the Québec Consumer Protection Act:

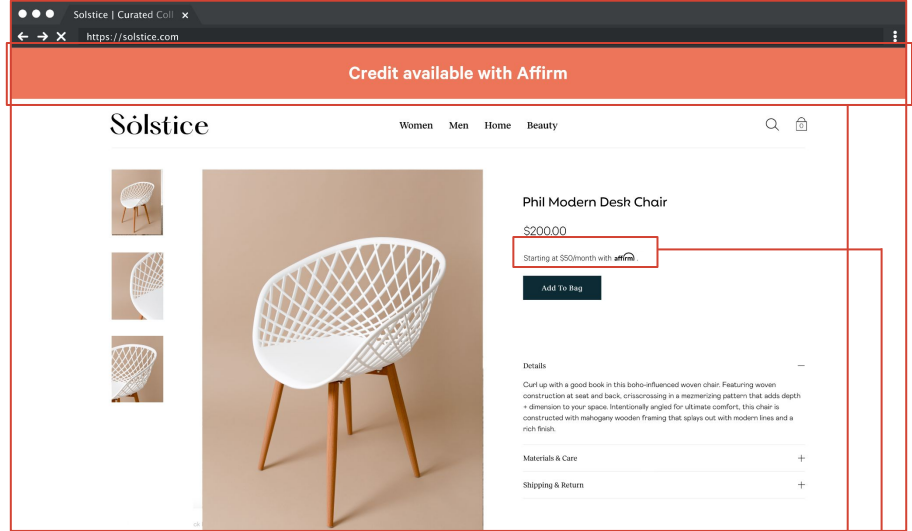
232: No merchant, manufacturer or advertiser may, by any means whatever, put greater emphasis, in an advertisement, on a premium than on the goods or services offered.

“Premium” means any goods, services, rebate or other benefit offered or given at the time of the sale of goods or the performance of a service, which may be granted or obtained immediately or in a deferred manner, from the merchant, manufacturer or advertiser, either gratuitously or on conditions explicitly or implicitly presented as advantageous.

Guideline 2 | Example



The mention of financing is **less prominent** in comparison to the goods



The mention of financing is **too prominent** in comparison to the goods



The mention of “starting at \$ / month” is noncompliant



QUÉBEC MARKETING GUIDELINES

Advertisements Concerning Credit

The following Guidelines describe the rules relating to advertisements concerning credit.

ADVERTISEMENTS CONCERNING CREDIT

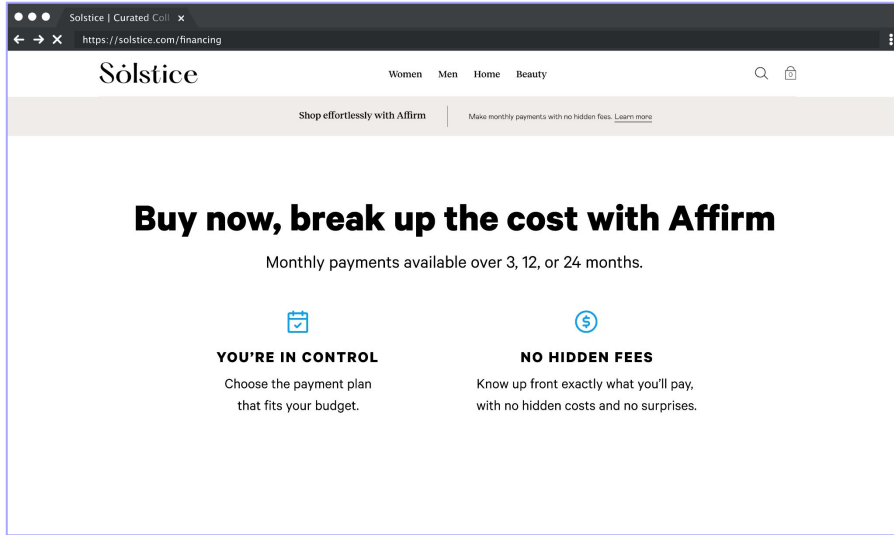
Guideline 3

On a page or advertisement for credit (for example, a financing page), there can't be any illustrations of goods or services or messages urging the consumer to make purchases using credit.

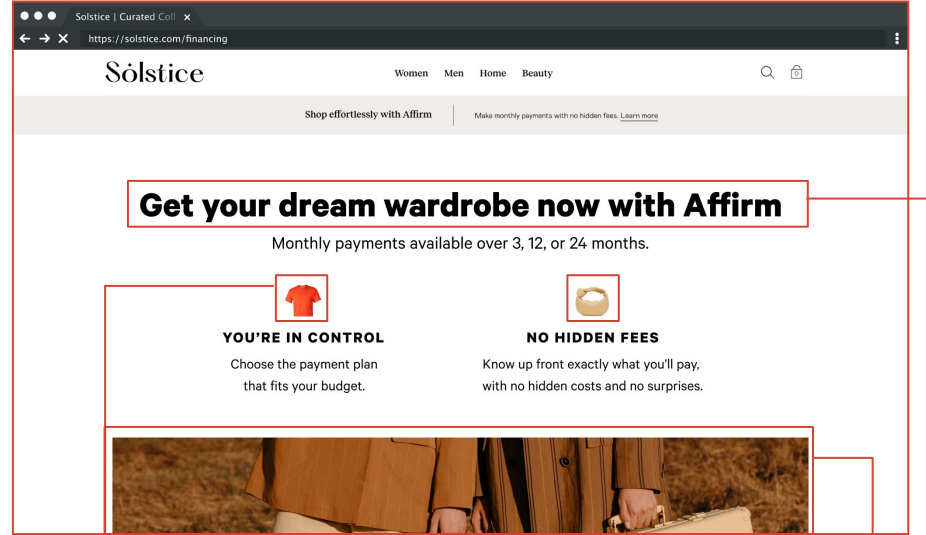
Relevant sections of the Québec Consumer Protection Act:

245: No person may, in any advertisement concerning credit, urge consumers to obtain goods or services on credit or illustrate goods or services.

Guideline 3 | Example



- “Buy now, break up the cost with Affirm”
- No imagery of related good and services










- Heading urges consumers to purchase on credit
- Icons are illustrations of related goods
- Page contains image related to goods

ADVERTISEMENTS CONCERNING CREDIT

Guideline 4

If any of the loan terms listed on the right is mentioned in an advertisement for credit, this triggers a requirement that all of those loan terms be disclosed (we recommend using the table format below). If it isn't possible to disclose all of the required terms, it is advisable to mention none of the terms that trigger the requirement.

The credit rate is excepted from this requirement, however, so an advertisement may state the credit rate or 'zero credit rate' without stating the prescribed terms.

HOW IT WORKS						
 PURCHASE AMOUNT \$3000	 MONTHLY PAYMENT \$250	 # OF PAYMENTS 12	 TOTAL INTEREST CHARGES \$0	 TOTAL REPAYMENT AMOUNT \$3000	 CREDIT RATE (APR) 0%	 TOTAL COST OF BORROWING \$0

Example for a \$3,000 purchase at 0% interest over 12 months:

Relevant sections of the Québec Consumer Protection Act:

247: No person may make use of advertising regarding the terms and conditions of credit, except the credit rate, unless such advertising includes the particulars prescribed by regulation.

Regulation 3, Section 84.

All advertising by a merchant regarding the terms and conditions of credit in a contract for the loan of money and including one of the following particulars:

- (a) a component of the credit charges;
- (b) The total credit charges,
- (c) the number and duration of the payment periods;
the amount of each deferred payment;
- (d) the total obligation of the consumer;
- (e)
- (f) a reference table of credit charges payable must include all those particulars ;

What this means

If your financing page mentions any of the above terms, they all should be disclosed. Affirm recommends inserting a table (example shown to the left).

Guideline 4 | Example



The loan terms used on your financing page (in our example: 12 monthly payments) must be reflected in the chart. Referring to a chart with different terms is not permissible.

Solstice Women Men Home Beauty

Shop effortlessly with Affirm | Make monthly payments with no hidden fees. [Learn more](#)

Buy now, break up the cost with Affirm

Monthly payments available over 3, 12, or 24 months.

YOU'RE IN CONTROL
Choose to make 12 monthly payments to help manage your budget.

NO HIDDEN FEES
Know up front exactly what you'll pay, with no hidden costs and no surprises.

How it works

SELECT AFFIRM AT CHECKOUT

APPLY ONLINE

ENJOY YOUR PURCHASE

Here's an example of a \$3,000 purchase at 0% interest over 12 months

HOW IT WORKS						
PURCHASE AMOUNT	MONTHLY PAYMENT	# OF PAYMENTS	TOTAL INTEREST CHARGES	TOTAL REPAYMENT AMOUNT	CREDIT RATE (APR)	TOTAL COST OF BORROWING
\$3000	\$250	12	\$0	\$3000	0%	\$0

ADVERTISEMENTS CONCERNING CREDIT

Guideline 5


In an advertisement, the installment amounts must be less prominent than the total price of the product/service.

Relevant sections of the Québec Consumer Protection Act:


- 224:** No merchant, manufacturer or advertiser may, by any means whatever,
- (b)** subject to sections 244 to 247, disclose, in an advertisement, the amount of the instalments to be paid to acquire goods or to obtain a service without also disclosing the total price of the goods or services and laying the greater stress on such total price;

Guideline 5 | Example

Your Order

 **Colma Light-Washed Denim** \$500.00
Size: 23
Quantity: 1

Subtotal	\$500.00
Shipping	\$0.00
Tax	\$0.00
Total	\$500.00


Or pay as low as \$44/mo. with 




Total Cost is more prominent than installment option.

Hyperlink should drive to a loan breakdown chart per Guideline 4

Your Order

 **Colma Light-Washed Denim** \$500.00
Size: 23
Quantity: 1

Subtotal	\$500.00
Shipping	\$0.00
Tax	\$0.00
Total	\$500.00

Or pay as low as **\$44.00** per month with 



Installment option is more prominent than total cost.

Thank you