

# A tradition of respect for customer privacy

Credit unions in Canada have a long history of respecting the privacy of their customers. As co-operative financial institutions, credit unions are committed to developing policies, procedures and service offerings that address privacy concerns.

We continue to protect your privacy and your right to control the collection, use and disclosure of your personal information. We have procedures in place which guide our employees and directors in maintaining confidentiality. What has been our ongoing business practice has now become our documented commitment to you.

Your credit union Board of Directors has adopted the Credit Union Code for the Protection of Personal Information, established related Policies and Procedures, and appointed a Privacy Officer.

## Your personal information

We hold personal information about customers to help us meet and maintain the highest standards of financial service. This information can include your name, address, age, income, use of accounts, credit history and Social Insurance Number.

We obtain this information from you directly, and from the product and service arrangements you have made with or through us. Information is also obtained with your permission from credit bureaus, other financial institutions and from the references you provide us.

Your personal information is collected for one or more of the following purposes:

- To understand your needs and eligibility for products and services;
- To open, maintain and administer your accounts and provide financial services that meet your needs;
- To obtain credit reports and evaluate your credit rating and credit worthiness;
- To administer and manage security and risk in relation to your accounts and the financial services provided to you;
- To comply with legal and regulatory requirements;
- To assist in dispute resolution;
- To offer and provide you with other products and services of the credit union and of its affiliates and service suppliers.

The law requires us to ask for your Social Insurance Number (SIN) when you open an interest bearing or investment account. We also ask for your SIN to identify you with credit bureaus and other financial institutions for credit matching purposes. Using the SIN is the best way to ensure the credit information actually refers to you. Giving us your SIN is not a condition of service.

We use trusted and reputable suppliers to provide cheque and statement printing, data processing, research and payment clearing services. We provide them with only that information which is necessary to perform the required services. They are not allowed to use this information for any other purpose than what we contract them for. Our suppliers and their employees are required to protect your information in a manner that is consistent with our Privacy Code.

Your information is sometimes shared within the Co-operative Financial Services Group™ of companies so we can offer you a full range of financial products and services. These affiliates include: Credit Union Members Insurance Society (CUMIS), Credential Group, Co-operative Trust Company of Canada, The Co-operators Insurance, CUETS and Celero Solutions. Any product or service offering that is derived from this sharing of information comes directly from us and not from our affiliates.

**Here is a summary of the 10 Principles of the Credit Union Code for the Protection of Personal Information. If you would like to receive a complete copy of the Code, please contact us.**

1. **Accountability** We have designated a Privacy Officer who is accountable for our compliance with the principles of the Code.
2. **Identifying Purposes** When we ask you for personal information, we will identify the purposes for which it will be used or disclosed.
3. **Consent** We require your knowledge and express or implied consent for the collection, use or disclosure of personal information.
4. **Limiting Collection** The collection of personal information is limited to the purposes we have identified for you.
5. **Limiting Use, Disclosure, and Retention** We will use or disclose your personal information only with your express or implied consent, or as required by law. We will retain your information for only as long as necessary to fulfill identified purposes.

6. **Accuracy** We will keep your information accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.
7. **Safeguards** We will protect your personal information with appropriate security safeguards.
8. **Openness** We will make specific, understandable information readily available to you about our personal information policies and practices.
9. **Individual Access** When you request it, we will give you access to your personal information, how we use it and who we disclose it to. You are entitled to question its accuracy, its completeness and its uses.
10. **Challenging Compliance** You are entitled to question the Privacy Officer about our compliance with any of these principles.

## Your consent

Depending upon the sensitivity of the information, you can provide us with your consent in writing, electronically or verbally. We will obtain your consent in writing when you become a credit union member or when you apply for a new credit union service offering.

We obtain or use your information only with your consent. We do not sell it to third parties or use it in any way we have not told you about. We obtain your consent before we:

- obtain credit reports or check references;
- contact you about other products or services of the credit union by direct mail, email or telephone;
- share your information with our affiliates so that we can offer their products and services to you;
- disclose your information to third parties unless we are obliged to do so by law or it is required for us to provide our financial services to you.

The attached withdrawal of consent form provides you an opportunity to limit the uses and disclosures of your personal information should you choose to do so. You may limit or withdraw your consent at any time, subject to legal or contractual obligations. For example, your credit union is required by law to provide a record of your interest earning information to the Canada Customs and Revenue Agency.

If you do not withdraw your consent, we will assume that we have your consent for the continued use of your personal information for purposes described within this brochure, including disclosure to affiliated organizations.

