

# **CHAPTER 15 - PEOPLES GROUP PERSONAL INFORMATION PROTECTION POLICY -**

## **Section B - For Customers**

### **Introduction**

Peoples Group is committed to protecting the privacy and security of customers' personal information. This policy explains the types of personal information we collect, how it is used, and the steps we take to ensure customer personal information is handled appropriately.

Our policies and practices have been designed to comply with Privacy Law.

In this Policy:

"Online Banking" means the portions of the Website relating to online banking transactions or account access

"Peoples Group", "We", "we", "Our", "our" and "us" means Peoples Trust Company and all of its subsidiaries and business operations

"personal information" means any information, recorded or unrecorded, which, either on its own or in combination with other information, could be used to identify, contact or locate a specific individual

"PIPEDA" means *Personal Information Protection and Electronic Documents Act*

"Privacy Law(s)" means PIPEDA and any applicable provincial personal information protection act

"Website" means the Peoples Group website, including the content, information and services provided on or through the website and by e-mail, including all on-line tools, applications, calculators and e-mail alerts

### **Examples of Personal Information**

Personal information includes such things as residential address, age, income, date of birth, ethnic origin, credit history, employment information, social insurance number (SIN), where applicable, payment records, credit card number, financial information, device geolocation (geographical location), unique identifiers such as user name, account number or password, and product or service preferences. The following types of information about individuals are not considered personal information:

- Business contact information (except in Quebec)
- Public telephone directory information, where the subscriber can refuse to be listed
- Professional and business directories available to the public
- Certain public registries and court records
- Certain other publicly available printed and electronic publications

### **Our commitment to protecting personal information is governed by the following privacy principles:**

#### **1. We are accountable to you**

Peoples Group is responsible for all personal information in its possession or control, including any personal information that is provided to us by our agents or transferred to third parties for processing, storage or other purposes. We have a designated Privacy Officer who is accountable for compliance with this policy.

## **2. We tell you how we use your information**

In most situations, the reason why we are collecting personal information and its use is obvious from the context. In other situations, Peoples Group identifies the purpose for which your personal information is collected and its use. We do this explicitly or by implication where the purpose of using such information is reasonably apparent to you by virtue of its nature or the context in which it is being collected.

## **3. We obtain your consent to collect, use or disclose your personal information**

Peoples Group obtains your consent to collect, use or disclose personal information. The method of obtaining consent will be appropriate to the type of personal information being collected, used or disclosed.

Peoples Group will obtain your express consent (verbal, written or electronic) to collect, use or disclose sensitive personal information such as medical data or personal financial information.

Peoples Group will rely on implied consent to collect, use or disclose your personal information where one or more of the following apply:

- A customer relationship already exists
- Express consent has previously been given for the same or similar use of the personal information
- Where the intended use of the information is reasonably obvious from the context in which it is obtained and you provide the information voluntarily

In some circumstances permitted by Privacy Laws, we will collect, use and disclose your personal information without your consent, including situations of urgency when it is impractical to obtain your consent, when Peoples Group needs to collect monies or in connection with an investigation or proceeding by Peoples Group or a law enforcement agency.

You can change your consent to any collection, use or disclosure of your personal information at any time on reasonable written notice, subject to permitted or required exceptions under Privacy Laws (e.g. where withdrawal of consent would frustrate a legal obligation such as collecting on a loan). While Peoples Group will make reasonable attempts to provide alternative arrangements, in some situations, withdrawal of consent may also deprive you of a benefit or service. To change your consent to collection, use or disclosure of personal information about you, refer to the "How to Contact Us" section below.

## **4. We limit collection of your personal information**

Peoples Group collects personal information required to provide the products and services you request. We will collect personal information only by reasonable and lawful means. Most of the information we collect about you is received from you directly. For example, we generally need your name, address, phone number, business phone number, email address, date of birth, or SIN (for identification and/or tax reporting purposes), if applicable, and account numbers. When you apply for credit, we may ask you to provide information about your employment and finances. Information relating to business customers may also include your business name, address, phone number, email address, industry type, financial status and details on the owners, operators and directors. When you conduct business with us, we keep track of your transactions and activity.

We may also collect information from other persons or organizations, including:

- government agencies and public registries
- credit reporting agencies, other lenders and financial institutions
- service providers, agents and other organizations with whom you or we conduct business, or
- persons authorized to act on your behalf under a power of attorney or other legal authority

We collect your personal information to manage our relationship with you and to consistently deliver high quality products and services. Examples of why we collect personal information include:

- Verifying your identity
- Communicating with you about your loans, securities or deposits
- Accepting deposits

- Considering applications for credit
- Processing and keeping track of transactions and reporting back to you
- Protecting against theft, fraud and error
- Analysis of information to determine that relevant services are offered to those who may need them
- Providing products and services requested by you
- Advising you of products and services that Peoples Group believes will be of interest to you and provide value to you
- To inform you about new business initiatives including contacting you to obtain your views and to encourage you to express your views about them
- To conduct research and generate statistics related to our business, products and services
- To monitor security
- To comply with legal and governmental requirements

From time to time, we may offer you the opportunity to participate in contests, giveaways or other promotions. Any personal information that you provide to us in these circumstances will be treated in accordance with this policy.

## **5. We limit use, disclosure and retention of your personal information**

Peoples Group uses and discloses your personal information only for the purposes for which it was collected unless permitted by Privacy Laws. You understand that Peoples Group may share personal information among its respective affiliates in order to provide you with services and to assist us in offering services to you. Peoples Group does not sell or rent personal information to any organization or person for any reason.

We disclose personal information to third party organizations to assist in providing customers with services or to obtain services to assist us in our business. If your personal information is shared with third parties, Peoples Group will require them to comply with this policy when dealing with your personal information.

Peoples Group regularly receives and sends customer personal information to and from its deposit-taking agents as part of carrying on its business and to ensure proper service and accounting procedures are followed.

Some additional examples of when we may disclose your personal information are as follows:

- With your consent
- To a person sharing a joint account with you in relation to the account
- If we have your SIN, we may use it for tax reporting purposes if you hold a product generating income and share it with the appropriate government agencies, as well as our third party providers who assist us in meeting governmental income reporting requirements. We may also use your SIN to ensure an accurate match between your personal information and your credit bureau information, or as an internal identification number to accurately identify customers having same or similar names
- To credit reporting agencies and other lenders
- To collect a debt owing to us
- When required or permitted by law
- In relation to an investigation or legal proceeding to investigate and protect you, other customers, and ourselves from error, risk, fraud and criminal activity, or
- In connection with a transaction to sell parts of our business, insure, sell or securitize assets, or merge or amalgamate parts of our business with another entity.

Peoples Group retains your personal information only as long as it is required for our business relationship or as required by applicable laws.

## **6. Collection, Use and Disclosure of Non-Personal Information**

Non-personal information is any information, other than personal information, that does not reveal your identity or directly relates to you as a person. Some examples of non-personal information we may collect from you are demographic information, such as occupation, language, age, gender, interests, the first three digits of your postal code, unique device identifier, and transactional data. Non-personal information may also

include personal information we have de-identified or aggregated to the point where it no longer identifies a particular individual.

At times, Peoples Group may make certain aggregated non-personal information available to strategic partners and third party service providers that work with Peoples Group, to provide or support our or their products and services or that help Peoples Group or its strategic partners and third party service providers to conduct data analysis, to develop and improve products and services, and determine the effectiveness of promotional campaigns. We reserve the right to use and share any such non-personal information with third parties for any lawful purpose.

If we ever combine non-personal information with any personal information, we treat it as personal information is treated under this Policy.

## **7. We May Send You Emails**

Peoples Group complies with Canada's Anti-Spam Legislation ("CASL") and we are committed to making sure you only receive the email communications that you want from us. Peoples Group will never send you unsolicited emails in connection with the marketing of Peoples Group, its services or products.

**We may send you emails** if you signed up to join our email list at a trade show or conference. We occasionally send emails to members of mailing lists shared with us from other organizations who have received your opt-in consent. Usually, this is from industry related advisory groups. We may occasionally contact you to notify you about updates to the Website or new products or services offered by us, or to deliver targeted information that may be of interest to you.

No matter how you join our list or provide us with your consent to receive communications, at the bottom of all our emails, you will find a clear, easy way to unsubscribe.

For more information about our Anti-Spam Policy or if you have questions or a complaint related to CASL, you may contact our CASL Compliance Officer immediately by phone at 1-855-683-2881, by e-mail to [caslofficer@peoplesgroup.com](mailto:caslofficer@peoplesgroup.com), or by mail to: CASL Compliance Officer, Peoples Group at 1400 – 888 Dunsmuir Street, Vancouver, BC, V6C 3K4.

## **8. We strive to keep your personal information current and accurate**

Peoples Group endeavours to keep your personal information up to date, accurate and relevant for its intended use. You can assist us by updating your personal information (e.g. change of address) with us.

## **9. The security of your personal information is a priority for Peoples Group**

We take steps to safeguard your personal information, regardless of the format in which it is held, including:

- Physical security measures such as restricted access facilities and locked filing cabinets
- Shredding of documents containing personal information
- Electronic security measures for computerized personal information such as password protection, database encryption and personal identification numbers
- Organizational processes such as limiting access to your personal information to a selected group of individuals
- Requiring third parties given access to your personal information to protect and secure your personal information

## **10. We provide access to your personal information kept by Peoples Group**

You can request access to your personal information kept by Peoples Group. Customers who wish to contact us should refer to the "How to contact us" section below. You may request any of the following:

- What types of personal information we have on record or in our control, how it is used and to whom it may have been disclosed

- Reasonable access to your personal information so you can review and verify its accuracy and completeness and request changes to the information. Peoples Group reserves the right to decline to make a requested correction but will append a notation to the record of your requested alternative information
- Updates to your personal information

Subject to applicable exceptions under Privacy Laws, such as where:

- Your request would divulge confidential competitive business information of Peoples Group
- The information is not readily retrievable and the burden or cost of providing access is disproportionate to the nature of the request
- Access could interfere with or prejudice an investigation or proceeding by Peoples Group or law enforcement agencies

## **11. How you can protect your personal information**

In addition to the steps we take to safeguard your personal information, we believe there are measures you should take to protect yourself as well.

We advise you to not share any personal or financial information with others unless you clearly understand the purpose of them requesting the information and that you have confirmed you are dealing with a legitimate contact. We also recommend that you not share any significant personal or financial information via email or voicemail.

## **12. Monitoring of Telephone Calls**

Peoples Group may monitor and/or record in-bound and out-bound telephone calls as permitted by law for training and quality assurance purposes, to detect and prevent fraud or other losses, and to enforce our contracts. Any recording obtained from monitoring telephone calls is treated as confidential.

## **13. How to contact us**

If you are uncomfortable about any information or requests you receive from Peoples Group via phone, fax, or email, please contact us immediately at 1-855-683-2881 to confirm the information or request is legitimate or to discuss the concern with our Privacy Officer.

You may also contact our Privacy Officer:

- By phone: (604) 683 - 2881
- By e-mail: [privacyofficer@peoplesgroup.com](mailto:privacyofficer@peoplesgroup.com)
- By mail to:

ATTN: Privacy Officer  
Peoples Group  
#1400, 888 Dunsmuir Street  
Vancouver, British Columbia  
V6C 3K4

If your questions, concerns and complaints have not been resolved to your satisfaction, you may also complain to the Privacy Commissioner within your jurisdiction, where applicable.

## **14. Peoples Group Online Privacy Policy**

While the internet is revolutionizing the way that we do business – providing convenient access to financial services from your home or office – we also recognize that it may bring legitimate concerns about privacy and security.

This Privacy Statement describes how your personal information is collected, used and disclosed when visiting any Peoples Group website, including the Online Banking site or utilizing any of the online services

offered by Peoples Group. Access to your online account, including the Online Banking site, requires you to use your personal customer number and password to enter.

## **15. Controlled Access to your Information**

To ensure that you are the only person accessing your personal information, we restrict access to your online account by requiring that you enter your customer number and password to login. Only you know your password. Our employees do not have access to your password, and they will not ask you to reveal it. If someone does ask you to provide your password to them, we ask that you refuse to do so and contact us immediately.

## **16. Online Banking Transactional Services**

By nature, our internet banking site has many transactional functions, such as transfers between accounts. These transactions are all logged to ensure that your accounts are debited or credited appropriately, and a history of each transaction is available to verify your account. We store and use your transactional information in the same fashion as if you performed the transaction at a branch or any other service channel.

## **17. Online Banking Security**

To create a secure channel between your browser and our server, we use 128-bit Secure Socket Layer (SSL) encryption, the highest level available. To learn more about 128-bit SSL encryption, and our security policies, please review our security information.

To provide you with a convenient method for purchasing financial services products, we provide secure online application forms. By nature, these forms capture personally identifiable information that we use to provide you with the products and services that you have requested. This information is processed in a fashion similar to that of application forms received through our other channels. The information contained in the application may be archived or stored, as governed by existing law or policy.

## **18. Website Usage Statistics**

To continually improve our site, we often collect information about how our Customers are using it. These usage statistics are only viewed in the aggregate – and are never tied to an individual.

We use this information for purposes such as improving the pages where our customers are having difficulties, and ensuring that we have the appropriate infrastructure in place to service future needs.

The information collected may include your IP address, your browser type and your operating system, as well as data that is passively generated as you browse the site, such as the number and types of pages visited, and the length of time spent per page and on the site overall.

## **19. Our use of Cookies**

We also use a key web technology called cookies. A cookie is a small information token that sits on your computer. As you use any financial services offered through Peoples Group Website, including the Online Banking site, cookies are passed back and forth between our server and your browser. While cookies can be used for a variety of reasons, we only use cookies where they are of benefit to our customers.

Specifically, we use two kinds of cookies – session cookies and persistent cookies. A session cookie exists only for the length of your browsing session and is deleted when you close your browser. A persistent cookie is a cookie that stays on your computer after you close your browser. A persistent cookie may or may not expire on a given date. We use a session cookie to maintain the integrity of your internet banking session. With each page that you visit, the cookie is passed back and forth between our server and your browser. We use the cookie to distinguish your session from the many others that may be happening at the same time. Our session cookies never store any personal information, such as your name, or date of birth, or financial information, such as your accounts and balances.

Most recent browser versions allow the user to set some level of control over which cookies are accepted and how your browser uses them. Many browsers will allow you to accept cookies from only known, reliable sites

that you select such as the Peoples Group Website or the Online Banking site. If you are concerned about cookies, we encourage you to upgrade your browser to a recent version and review the Help section of your browser to learn more about its specific control features.

## **20. Memorized Accounts Feature**

We may use a persistent cookie to store information to help you personalize your online accounts and to make it easier to use. For example, we allow you to make the Online Banking login easier by remembering your Customer Number and Branch within our Memorized Accounts feature. Since the Memorized Accounts feature is optional, this cookie only contains information that you have entered into it.

## **21. Logout Button**

To ensure that someone cannot access your personal information, always exit your online account using the logout button located at the top of every page. When you exit using the logout button, we delete your session cookie so that your session cannot be resumed unless your customer number and password are re-entered.

## **22. Online Banking Enhanced Security Feature**

On the login screen, our Enhanced Security feature provides you even greater control over your privacy.

When you click on the Enhanced Security checkbox, the Online Banking site will prevent your browser from caching (storing in the computer's memory) those pages that you have viewed. Should you click on the Back button to view a previous page during a session, the page will be recalled directly from our server. Therefore, when you logout, no one will be able to view your information by clicking on the Back button, or by viewing the browser's History.

Use this function if you are accessing your accounts from a publicly available computer such as in a library or airport. You may also want to consider using the feature if you are using a computer at work, or a friend's computer, to access your accounts.

Once again, it is important to remind you to always logout of the Online Banking site using the logout button.

## **23. Online Banking Automatic Session Time-outs**

In the event that you leave your computer without logging out, the Online Banking site has been designed to end your session automatically if our system detects that you haven't provided any instructions or used the browser buttons to navigate for several minutes. To restart the session, you will need to provide your password again.

## **24. Email**

If you choose to communicate with us electronically, we strongly recommend that you use our Contact Us feature. This feature provides a secure channel for sending us comments, questions or instructions.

General email is not secure since it passes through many points on its route from you to us. If you are using general email to communicate with us, we strongly recommend that you do not include personal financial information (such as account numbers) within the email as we cannot guarantee its confidentiality en route to us.

When you email us your comments, questions or instructions, you provide us your email address and we use it to correspond with you.

We will not provide your email address to anyone outside of Peoples Group. We may use your email address to send you information about financial products or services that we think may be of interest to you. If you do not want us to contact you with product information by email, you may tell us so at any time by using the Contact Us feature. We will discontinue the practice.

If you have asked us to provide you with information on a regular basis, or if we email you information about our products or services, you may ask us to remove you from the list at any time. We intend to include

instructions to unsubscribe from the list in every mailing, and on the site where you originally subscribed to the list.

## **25. Service Partners**

Peoples Group often uses external service partners and suppliers to assist us. In performing their duties, these service partners may handle components of your personal information on our behalf. We ensure through our contracts with these partners that they handle your information with the same standard of care that you have come to expect from us. Our suppliers, like our employees, are bound to maintain your confidentiality and may not use the information for unauthorized purposes.

Some of our partners require that you first register with their service to permit us to tie their functionality into the services provided by Peoples Group. Registration for these external services will always be at your discretion. We may append personally identifiable data to this registration for the partner to use to compare and validate the registration. You will always be notified of such an action during the registration process.

In the event our service provider is located in a foreign jurisdiction they are bound by the laws of the jurisdiction in which they are located and may disclose personal information in accordance with those laws.

## **26. Links to Other Sites**

Peoples Group websites, including the Online Banking site, may also contain links to other websites or internet resources. As an example, from time-to-time we may provide links to Microsoft or Netscape to assist you in upgrading your internet browser. However, Peoples Group has no responsibility or liability for or control over these other websites or internet resources or their collection, use and disclosure of your personal information. Always review the Privacy Statements of the sites that you are viewing.

You should be aware that off-site pages or other sites might be available only in English or in other languages. Sachez que les pages qui ne figurent pas sur le site Web du Groupe Peoples ou certains autres sites pourraient n'être disponibles qu'en anglais ou dans d'autres langues.

## **27. Protecting Your Privacy – We're in it together**

This policy is subject to change. Please review it from time to time. If we make changes, we will amend the "revised" date at the bottom. Any changes will become effective when we publish the revised Policy. If we make any material changes, we will notify you by mail, email or by means of a notice on the Website commensurate with or prior to the change becoming effective.