

# Privacy — How we protect you (Effective until August 31, 2017)

CWB Financial Group is committed to the protection of your privacy. This commitment includes treating you fairly and with respect, and complying with the principles set out in the CWB Privacy Code.

The details of how and why we work to protect your privacy are below. If you have any questions or concerns about our Privacy Code or practices, please contact the branch or office where you do business. You can also contact CWB's Chief Privacy Officer at:

Canadian Western Bank  
3000, 10303 Jasper Avenue NW  
Edmonton AB T5J 3X6  
Phone: 780.423.8888  
Fax: 780.423.8897  
Email: concerns@cwbank.com

\*In the Privacy Code below, Canadian Western Bank and its partner companies are referred to collectively as "CWB."

## Personal Information

Personal information is information that identifies you. It includes your:

- Name and address.
- Age and gender.
- Personal financial records.
- Identification numbers such as your Social Insurance Number.
- Picture.
- Personal references.
- Employment records.

Personal information should be accurate, complete and up to date and will be protected by security safeguards appropriate to the sensitivity of the information.

## Collection of information

We only collect personal information from you by fair and lawful means and for legitimate and necessary reasons, such as:

- Identifying you.
- Protecting you and us from fraud and error.
- Complying with legal requirements.
- Understanding your needs.
- Determining your eligibility for our products and services.
- Helping us match our products and services to your needs.

The Income Tax Act requires that we ask you for your Social Insurance Number in connection with interest bearing and registered accounts. We will not collect more information than we need and we will tell you why we need it.

## Consent

We will, under normal circumstances, obtain your consent to collect, use or disclose your personal information. Your personal information may be shared, to the extent permitted by law, within CWB. With this more comprehensive understanding, we are better able to meet your needs as they grow and change. We will only release your information to outside parties with your consent, when required or permitted by law, for the promotion of our products or services, or for servicing purposes, for example cheque printers, marketing surveys and third-party processors. These outside parties may be located in other jurisdictions or countries. Personal information shall be retained only as long as necessary for the purposes identified by CWB.

By providing your personal information to us, we will assume, unless we hear from you to the contrary, that you have consented and are consenting to this use and disclosure. You may withdraw all or part of your consent for us to use your personal information within certain legal restrictions. If consent is withdrawn, we may be limited in the products and services we can provide to you.

We may tell you about CWB products or services through direct mail, email, by phone or by other means. If you do not wish us to do so, contact the branch or office where you do business. This would not limit information you may receive with your statement or during conversations with our staff. If you do not wish to receive information with your statement, contact the branch or office where you do business and they will note your preference.

## CWB Privacy Code

### Accountability

CWB is responsible for personal information under our control including information that has been transferred to a third party for processing. CWB has designated its Chief Privacy Officer to be accountable for our compliance with the CWB Privacy Code. However, all employees are responsible for privacy compliance.

### Identifying purposes

The purposes for which personal information is collected shall be identified at or before the time the information is collected.

### Consent

The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except where inappropriate (e.g., for legal requirements, medical emergencies or security reasons). An individual can withdraw consent at any time by contacting the branch or office where the individual does business, subject to legal or contractual restrictions and reasonable notice.

### Limiting collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by CWB. Information shall be collected by fair and lawful means.

### Limiting use, disclosure and retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

### Accuracy

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

### Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

### Openness

CWB shall make readily available to individuals, specific information about its policies relating to the management of personal information.

### Individual access

Upon written request to the branch or office where an individual does business, the individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information except where inappropriate. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate. Access will be given no later than 30 calendar days after receipt of the request. Costs to comply with the request are at the requestor's expense. The individual will be informed of the approximate costs in advance. Refusal to provide access for valid reasons will be explained in writing to the individual. Some possible reasons for refusal include the following:

- Access would reveal information about a third party.
- Information is protected (e.g., solicitor-client privilege).
- Access threatens life or security of another individual.
- Access reveals confidential commercial information.
- Access reveals information generated in the course of a formal dispute resolution process.
- Access reveals information gathered for reporting a breach of an agreement or contravention of a law.

### Challenging compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for CWB's compliance (refer to Principle 1 Accountability above).

