

# Vancity Privacy Code



When you interact with Vancity, you entrust us to keep sensitive personal information about you private and safe. While ensuring the safety and security of your personal information is a shared responsibility, the Vancity Privacy Code outlines the principles and commitments we make to protect your privacy and personal information.

Vancity develops privacy policies and procedures, receives and responds to privacy complaints and questions, and trains staff regarding privacy policies and procedures. Vancity senior management and the Chief Privacy Officer are accountable for the operation of our privacy program and compliance with this Code.

To Contact the Corporate Privacy Office, please see the contact information at the end of this document.

## **Your Consent:**

Vancity needs your consent to open a membership and provide you with products and services. We will ask for consent to collect, use, disclose, or retain your personal information. The exceptions to when we will ask for consent are outlined in this Privacy Code, or when we are authorized or required by law. Consent can be express, implied, or given through an authorized representative such as a lawyer, agent, or broker. Express consent may be given orally, in writing, or electronically. Implied consent is when Vancity can reasonably infer consent based on your circumstances.

Vancity needs your consent to collect personal information about you in a marketing context, such as: conducting a survey, general member acquisition activities, while attending a community event, or during an online interaction.

### **Refusing consent**

Members may withdraw or refuse consent to collect, use, disclose, or retain certain personal information. This withdrawal or refusal may prevent Vancity from providing a product or service to the member. If the information is required by law or necessary to operate banking systems, Vancity may decline or discontinue membership.

### **When your consent is not required**

In limited circumstances, Vancity may collect, use, disclose, or retain personal information without your knowledge or consent. For instance:

- When it is permitted or required by law.
- During an emergency that threatens an individual's life, health, or personal security.
- When there is reason to suspect that a member may be the victim of abuse and Vancity is disclosing the information to a government institution or an authorized representative.
- When Vancity needs to collect a debt from you.
- When Vancity needs to deal with an anticipated breach of law.

### **Opting out of marketing**

At any time, you may opt out of receiving marketing offers from Vancity. To do so, you may visit a Vancity community branch, call us at 604-877-7000, or complete an online Opt-Out Form.

## **Your Personal Information:**

Vancity collects personal information about you through our interactions with you, from products and services you have with Vancity, from credit bureaus and other financial institutions, and from any references you have provided.

Your personal information will be collected, used, disclosed, and retained for the purpose for which it was obtained or for purposes authorized or required by law. Vancity will not collect, use, disclose, or retain personal information for any other purposes unless your consent to do so is obtained.

Vancity does not collect your biometric data. Touch ID & Face ID data used for authentication via our mobile app is stored on your device and is not accessible by Vancity.

**Vancity collects your personal information to:**

- Verify your identity. For example: in branch, over the telephone, via online banking including multi-factor authentication by text/SMS or voice call.
- Provide the best advice/financial services to you and determine your eligibility for different products and services.
- Understand the retail, financial, and banking needs of Vancity's members and develop/manage products and services to meet your needs.
- Periodically conduct surveys and contact you directly for products and services that may be of interest
- Use the information for study and/or research while preserving your privacy and confidentiality to improve Vancity products, services, and operations or for Vancity-approved third party research purposes.
- Meet regulatory requirements, obtain legal advice, or bring or defend against legal proceedings.
- Help protect Vancity and you against fraud and error.

**Using your personal information**

- Vancity may share your information with its employees and business partners, credit reporting agencies, other financial institutions, Canada Revenue Agency, financial industry regulators, and your legal representatives. Information will be shared only as needed to provide the products and services requested, for the purposes described in this Code, or when authorized or required by law.
- For a credit card, overdraft protection, line of credit, loan, mortgage, other credit product, or hold/withdrawal/transaction limits, Vancity may collect information and reports about you from credit reporting agencies, financial institutions, and other lending institutions during the application process, and on an ongoing basis to review and verify your creditworthiness and/or establish credit and hold limits.

**Disclosing your personal information**

- Vancity will not sell member personal information to third parties.
- Vancity will not share your health or medical information within Vancity, unless necessary to administer an insurance product.
- Our business partners will be provided the information necessary to perform the services by them or by their service providers. Vancity works with our business partners to ensure that they protect, use, disclose, and retain personal information in a manner consistent with our privacy policies and security practices.
- Our business partners may be located in other jurisdictions and subject to the laws and regulations of other jurisdictions or countries, such that other countries' governments, courts, or law enforcement agencies may access your personal information.
- Vancity may have personal information about you disclosed to us by our business partners to provide you with services, as described in the section 'Vancity collects your personal information to', and per our contractual agreements.
- Subject to the law, Vancity may share your information with subsidiaries and affiliates in order to manage your relationship with Vancity, administer Vancity's banking operations, adjudicate credit, detect fraud and money laundering, service credit/loans, collect debts owed to Vancity, and market products and services that may be of interest to you.
- Vancity may disclose personal information related to a financial asset or liability of Vancity along with transfer of the financial asset or liability.

-If a member has a product or service where ownership or liability is shared with others, Vancity may share the member's information with such other persons in connection with the product or service.

-Vancity may acquire new businesses, sell some parts of its businesses, merge or amalgamate part or all of its businesses with other entities. As personal information associated with any accounts, products or services of the business being purchased/sold/merged will typically be included in such transactions, Vancity may disclose such information to such other entities as part of the transaction or review prior to the transaction. Any such disclosure will be subject to appropriate privacy and security safeguards and compliant with any applicable law.

-If and when you choose to enroll in third-party finance software, for instance for budgeting or accounting, you disclose your online login information at your own risk.

#### **Retaining your personal information**

-Vancity will retain your personal information for as long as necessary for the identified purposes and for legal and business purposes.

#### **Your Social Insurance Number (SIN)**

-We are required to collect your Social Insurance Number for tax residency self-certification and for any products that earn investment income (including membership shares) to comply with the Canada Revenue Agency's reporting requirements.

-Providing a SIN for credit products is optional. By not providing us with your SIN, you may limit the credit options available to you.

-You may advise Vancity not to use your SIN as an aid to identify you with credit reporting agencies by contacting the Vancity Corporate Privacy Office. If you opt out, Vancity will use alternative methods to identify you with credit reporting agencies.

#### **When you call us**

-Vancity may monitor and/or record your telephone calls with Vancity representatives. The purpose of this is for mutual protection in cases of miscommunication or dispute, to improve member service, and to improve or develop Vancity products and services.

#### **When you connect with us online**

-When you access Vancity's website, online banking, mobile app, or apply for products and services online, Vancity may collect information from you, your computer, or your mobile device. For more information, see our website.

-Vancity.com uses cookies and similar technologies to help provide our members with the best experience we can. For more information, see our website.

### **Accuracy and Safeguarding:**

Vancity is committed to keeping your personal information accurate, complete, current, and safe.

Vancity will update your personal information if it is necessary to fulfill the purposes for which it was collected or if it is required to maintain a product.

Members should proactively update Vancity to ensure the accuracy of their personal information. In many cases, Vancity relies on you to ensure that certain personal information, such as your address, telephone number, and tax residency, is accurate. Keeping your personal information accurate lowers your fraud risk, avoids your statements being mailed to an incorrect address, and ensures accurate reporting on Vancity's part.

If a request to update personal information refers to disputed information, Vancity will note the member's request.

### **Accessing Your Information:**

You have a right to access your personal information held by Vancity. Upon request, Vancity will tell you within 30 business days what personal information it has, what it has been used for and with whom it has been shared.

If you would like access to your personal information held by Vancity, please submit a written request to your local community branch or directly to the Corporate Privacy Office.

**Access requests:**

- Vancity will require you to verify your identity to ensure that the access request is legitimate.
- Vancity may request that you specify the type of information you would like to access.
- If Vancity is unable to fulfill the access request within 30 business days, a written notice of a time extension will be provided within 30 days of the request. The notice of extension will advise of the new time frame, the reason(s) for extending the time frame, and of your right to make a complaint to the Information and Privacy Commissioner for British Columbia regarding the extension.
- There may be a cost to fulfilling an access request, depending on the type and amount of information requested. When there is a cost, Vancity will inform you of the estimated cost and ask you whether Vancity should proceed with the request.
- If an access request is refused, in whole or in part, Vancity will provide written notification to the member of its refusal, reasons for refusal, and what other options the member has.
- The information provided will be made available in a way that is accessible to you.

**Reasons why an access request may be denied:**

- The personal information is unreasonably costly to provide.
- The disclosure of the personal information to the member would threaten the life, health, or security of another individual.
- The personal information cannot be disclosed without disclosing the personal information of other individuals.
- The personal information was generated in a formal dispute resolution process or is subject to solicitor client or litigation privilege.
- The personal information cannot be disclosed for legal, security, or commercial proprietary reasons, including being subject to an investigation by law enforcement.
- If the information provided is inaccurate or incomplete, Vancity will amend the information as requested by the member and, where appropriate, share the amended information with relevant third parties.

**About this Privacy Code:**

The Vancity Privacy Code is based on British Columbia’s *Personal Information Protection Act* (PIPA). Vancity will notify you via [vancity.com](http://vancity.com) of any substantial changes to this Code before the changes come into effect.

This Code applies to the personal information of individual Vancity members and prospects, including sole proprietors and signing officers on business accounts, as well as non members who have interacted with Vancity. This Code does not apply to business members, corporate/commercial entities, or Vancity Community Investment Bank (VCIB). For the VCIB Privacy Statement, visit [vancitycommunityinvestmentbank.ca/privacy](http://vancitycommunityinvestmentbank.ca/privacy).

**Questions and Complaints:**

Members should direct any questions, concerns, or complaints regarding their privacy or this Code to the Corporate Privacy Office. Our Privacy Office will acknowledge, document, and investigate each privacy complaint it receives, and members will receive a response within a reasonable time period.

<b>Mail</b> Vancouver City Savings Credit Union Corporate Privacy Office	<b>Email</b> <a href="mailto:privacy@vancity.com">privacy@vancity.com</a>
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183 Terminal Avenue Vancouver, B.C. V6A 4G2 ATTN: Chief Privacy Officer	<b>Phone</b> 604-877-8479
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If the Corporate Privacy Office is unable to address your concern, the issue may be referred to the office of the CEO. Members may also contact the Office of the Information and Privacy Commissioner for British Columbia at [oipc.bc.ca](http://oipc.bc.ca)

Privacy Code updated: September 30<sup>th</sup>, 2021

Make Good Money (TM) is a trademark of Vancouver City Savings Credit Union