



Customer Privacy Policy

Audience

All employees; all customers

Key Messages

1. Coast Capital is committed to maintaining the security, confidentiality and privacy of personal information.
2. Coast Capital collects, uses or discloses the personal information of customers in accordance with this Policy or otherwise with the consent of the customer or in compliance with the law.
3. Coast Capital has a Privacy Office dedicated to dealing with privacy issues.
4. The collection, use and disclosure of personal information by Coast Capital are governed by the *Personal Information Protection and Electronic Documents Act (Canada)*.

Coast Capital's Policy & Governance Philosophy

We look after people's money. Bottom line. And, we provide an engaging and respectful workplace. Our policies are in place to help protect our customers, our members, our employees and our company. Coast Capital's purpose is to change the way Canadians feel about banking, forever – consistent with high ethical standards and upholding our reputation, regulatory requirements and the law.

Effective date: January 3, 2018

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1. Our Commitment to You

Introduction

When you become a customer of Coast Capital Savings Group of Companies¹, you trust us with sensitive information about yourself. We believe that maintaining your trust is the single most important thing that we do. We want you to know that we respect your privacy and that we are transparent about what we do with your personal information.

2 About This Policy

(a) Rationale

We are committed to maintaining the security, confidentiality and privacy of your personal information. We developed this Policy in accordance with privacy laws² and we also tried to keep it simple. We want everyone to fully understand our privacy practices.

(b) Definition of Information

This Policy applies to the Information of individuals. When we say “Information” we are talking about information that is about you that applicable law classifies as personal information, such as your contact information. This generally excludes your business contact information.

In addition to this Policy, individual products or services may come with their own privacy terms and conditions. Please be sure to refer to any specific agreements you have with us, as these also impact what we do with your information.

(c) Amendments to Policy

From time to time, we may amend this Policy. When we do so, we will put up a notice on our website, and we may also notify you directly by mail or email or through signage at our branches.

¹ The Coast Capital Savings' Group of Companies is comprised of Coast Capital Savings Federal Credit Union and each of its subsidiaries, affiliates, divisions, and other associated companies. For clarity, this includes Coast Capital Financial Management Ltd., Coast Capital Wealth Management Ltd., Coast Capital Equipment Finance Ltd., Travelers Finance Ltd. and Travelers Leasing Ltd.

² Coast Capital Savings is primarily governed by the *Personal Information Protection and Electronic Documents Act*(Canada) <https://www.priv.gc.ca/en> but there may be times when other provincial privacy legislation applies.

3. How Do We Obtain Your Consent?

(a) Obtaining Consent

Before we collect, use or disclose your Information, we will obtain your consent, except in accordance with privacy laws. We will only make your consent a condition of obtaining a product or service when it is reasonably required for us to provide that product or service.

Consent can be obtained verbally, electronically or in writing and may also, in some circumstances, be implied, such as when you leave a telephone number and request that we call you. You can also give express consent through an authorized representative such as a lawyer, agent or broker.

(b) Exceptions

There are certain times when we do not need your consent or when we are legally prevented from asking for your consent to collect, use or disclose your Information. Here are some examples:

- when we are collecting or paying a debt
 - when we are obtaining legal advice
 - when obtaining your consent would interfere with an investigation or legal proceeding
 - when we are obeying a court order or similar demand, or
 - when there is a medical emergency.
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(c) Refusing or Withdrawing Your Consent

Subject to legal or contractual requirements, you may refuse or withdraw your consent to the collection, use or disclosure of your Information at any time, as described further under the heading “What Are Your Options?”.

4. What Are Your Options?

We use your Information to provide you with the best products and services possible. However, we understand that you may not want us to use your Information in certain ways. That’s why we give you the choice to opt-out in circumstances where we are able to do so.

(a) Credit Checks and Credit Reporting

You may ask us not to use your Social Insurance Number (“SIN”) to conduct a credit check for the purpose of assessing an application for credit. We will respect your choice but this may result in credit being denied because we cannot complete our credit approval process.

- (b) Social Insurance Number** We are required to collect and use your SIN for the purpose of reporting interest to the government. In circumstances that we are not required to collect and use your SIN, such as to identify you, to ensure the accuracy of your Information or to conduct credit checks, you may instruct us not to do so. Please be aware that if a SIN is not used for a credit check, the credit report may contain inaccuracies, particularly where individuals have common names.
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- (c) Promotions and Customer Surveys** We send Information by phone, mail and email about special offers and promotions and to conduct customer research and surveys. If you do not wish to be contacted for promotional or survey purposes, we will make it convenient for you to opt-out. Your choice to opt-out may not immediately take effect if a marketing or survey campaign is already underway when you opt-out.
- Opting-out of promotions and surveys does not apply to material associated with your written or electronic account statements, or that we happen to discuss if you call or visit us. It also does not apply with respect to information about special offers and promotions that do not utilize your Information, such as advertisements of a general nature.
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- (d) Sharing within Coast Capital Savings** We share Information between each of the entities that make up Coast Capital Savings so that we can manage our business risks and comply with legal requirements. You may not withdraw your consent for this sharing. However, we also share Information within Coast Capital Savings to conduct research and to offer products and services to you. If you do not consent to the sharing of your Information for these purposes, you may opt-out.
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- (e) How to Opt-Out** If you want to withdraw your consent from any of the optional purposes mentioned above, please let us know that you want to opt-out by visiting a Coast Capital Savings branch or call the Contact Centre at 604-517-7000 (Lower Mainland) 250-483-7000 (Vancouver Island). This is necessary so we can properly verify that it is you making the request. We will require a reasonable period of time in order to implement your request.
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5. How and Why Do We Collect, Use and Disclose Your Information?

- (a) Collecting and Using Your Information** We want you to understand how and why we collect, use and disclose your Information. Except in accordance with privacy laws, we will always explain to you the purposes for collecting, using or disclosing your Information either orally or in writing, including through this Policy.

Background

The Information that we collect from you depends on the specific products and services you request. Most of the Information we collect about you is received from you directly. For example, to provide you with products and services, we generally need your name, address, date of birth, and occupation. We also need to ask you for identification and contact information, such as your phone number or email address.

When you apply for credit we may ask you to provide Information about your employment and finances. When you conduct business with us, we keep track of your transactions and activity.

Information Collected from Other Sources

We also collect Information from other persons or organizations, including the following:

- 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.
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Using Your Information

We collect and use Information to manage our relationship and to consistently deliver high quality products and services. This includes collecting and using your Information for the following purposes:

- to determine your eligibility for products and services
 - to process your accounts, transactions and statements
 - to provide products and services at the time of request and on an ongoing basis
 - to provide you with information and materials related to membership
 - 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 manage and assess our operations and risks
 - to improve and develop products and services
 - to conduct research and generate statistics related to our business, products, services and membership
 - to comply with applicable laws and the requirements of regulators
 - to investigate and protect you, other customers, and ourselves from error, risk, fraud and criminal activity
 - to contact you for purposes related to your account, membership and other services, and
 - to offer you products and services that may benefit you.
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(b) Disclosing Your Information

There are times when we disclose your Information to other persons or organizations, but under no circumstances do we sell or give customer lists to other companies. Here are some examples of when, in our discretion, we disclose Information:

- at your request
 - with your consent
 - to a person sharing a joint membership with you in relation to the membership
 - 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.
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Third Party Suppliers

We work with third parties who help us with our business or with providing you products and services. Your additional consent is not required, but when we disclose your Information to third parties, we only give them what is necessary and we take steps to ensure they handle your Information just as carefully as we do.

Information may be stored and processed outside of Canada or provided to suppliers and other third parties that perform their activities in other jurisdictions. Accordingly, your Information may be subject to valid information requests made by the government agencies in these jurisdictions.

(c) Call Recording and Video Surveillance

When you speak to our representatives on the telephone, your conversations may be monitored or recorded for quality assurance, record keeping, investigational or training purposes. In order to protect our customers and ourselves from criminal activity, we use security cameras at our branches and ATMs. If you prefer not to be recorded by audio and/or video, many but not all transactions can be conducted using our Coast Online® internet banking system or Coast Mobile Banking™ services.

(d) Contests and Promotions

From time to time, we may offer you the opportunity to participate in contests, giveaways or other promotions. Any Information that you provide to us in these circumstances will be treated in accordance with this Policy, subject to the applicable rules and agreements.

(e) Health Information

We collect, use, disclose and retain Information about your health in order to provide you with requested insurance products, such as life insurance. We do not use this Information for any purpose unrelated to these insurance products and we do not share it between Coast Capital Savings entities.

6. How Can You Access Your Information?

(a) Background

You have a right to request access to Information that we have about you. In the case of credit related decisions, we will gladly provide you with the contact information of any credit reporting agencies that produced a report that was relevant to making a decision.

(b) Access to Information Form

Much of the Information we have about you is available on your account statements and through Coast Online® or Coast Mobile Banking™. Individuals can request access to their Information in-branch or by calling our Contact Centre where staff will complete the Access to Information Request Form and forward it to the Privacy Office on your behalf. Individuals can also write directly to the Privacy Office to request their Information (contact information is below). In response to your request, we can provide you with the Information that we have under our control, details about how we have used it and to whom we may have disclosed it. Our regular practice is to respond to your request within 30 business days or as permitted by privacy laws.

(c) Fulfilling Your Request

There may be a reasonable charge for Information you request in accordance with privacy laws. We will let you know in advance what the estimated cost will be. Remember to bring identification when you come to pick up your Information, otherwise we cannot give it to you.

(d) Limitations on Access

There are circumstances where we cannot provide you with certain Information. For example, we cannot grant access to records that contain the Information of other persons, proprietary information, or where we are prohibited by law. If we do not provide you with certain information, we will tell you the reason why in compliance with privacy law.

7. How Do We Stay Up-To-Date?

Inform Us of Changes to Your Information

We take reasonable steps to ensure that your Information is accurate and current, but we can always use your help. Please keep us informed by telling us when the Information in our control is not current or contains an error. We will notify anyone that we have misinformed as a result of an error in your Information.

8. How Do We Keep Your Information Safe?

We are committed to ensuring that your Information is protected.

(a) Security Measures

We protect your Information against unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks using thorough and reasonable safeguards, training, and security measures.

(b) Retention of Information

We will only retain your Information for as long as we reasonably require it for legal or business purposes. We will then take care that your Information is destroyed or made unidentifiable to prevent unauthorized access to the Information.

(c) Notice about Email Fraud

Criminals have been known to send emails, claiming to be a financial institution, where they ask customers to send them passwords or other personal banking Information. We recommend that you do not send sensitive or confidential information by email. We will not be responsible for any damage caused if you send us, or request that we send you, confidential Information by email.

9. How Are We Accountable?

(a) Our Privacy Office

Our Privacy Office oversees our compliance with this Policy and privacy laws. One of the Privacy Office's duties is to respond to your inquiries. If you have questions about your privacy or this Policy, or if you have a complaint about our collection, use or disclosure of your Information, please contact our Privacy Office.

**(b) Contact
Information**

Privacy Office
Coast Capital Savings
#800 – 9900 King George Blvd
Surrey, BC V3T 0K7

Email: centralprivacyoffice@coastcapitalsavings.com
Toll-free: 1.888.517.7000 (please ask for our privacy office)
Fax: 604.517.7415
