

Privacy Code

DirectCash Bank knows the importance of keeping your personal information confidential. We have developed a Privacy Code that describes the principles the Bank will adhere to in order to protect the privacy of your personal information. Our Privacy Code is based on the Personal Information Protection and Electronic Documents Act (PIPEDA), the Canadian Bankers Association Model Privacy Code and the Canadian Standards Association Model Code for the Protection of Personal Information.

Personal information is information that identifies you as an individual. It includes not only such things as your age and gender, but also your personal financial records and identification numbers, such as your social insurance number. Personal information does not include the name, title or business address or telephone number of an employee of an organization, nor publicly available information, as defined in PIPEDA. While the Privacy Code does not apply to information about business customers carrying on business as corporations, partnerships or in other forms of association, the Bank protects the confidentiality of such information in accordance with the Bank's policies and the law. The Privacy Code does apply to information about business customers carrying on business as sole proprietors.

Personal information is collected from you only when it is needed; for example, to identify you, understand your financial needs, determine your credit worthiness, determine which of our past and future products and services are suitable for you, provide ongoing services, and to meet legal requirements. Also, having this information protects you and us from error and fraud. Your social insurance number is required for products which earn investment income, in order to comply with the Canada Revenue Agency's reporting requirements. It is optional for other purposes. If you provide your SIN, we may use it for administrative purposes or to obtain information from credit bureau. We will not sell any of your personal information to others.

The Bank is committed to adhering to the following principles of privacy.

- 1. Accountability**

We are accountable for all personal information in our control. We have procedures in place to comply with this Code and have designated our Vice President and General Counsel as our "Privacy Officer".

- 2. Collecting Personal Information**

We will identify the purposes of collecting personal information from you before or when such information is provided.

- 3. Consent**

We will make a reasonable effort to make sure that you understand how your personal information will be used and disclosed. We will get your consent before or when we collect, use or disclose personal information.

We will not deceive you into giving consent. You can withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. We may collect, use or disclose personal information without your consent for legal, security or certain processing reasons.

4. Limits on Collection

We will limit the amount and type of personal information we collect from you to that which is necessary for the purposes identified. We will collect personal information using procedures which are fair and lawful.

5. Limits on Use, Disclosure and Retention

We will use or disclose personal information only for the reasons it was collected unless you give consent to use or disclose it for another reason, or as required by law. Under certain exceptional circumstances, we will have a duty or right to collect, use or disclose personal information to protect our interest or the public's interest, without your consent. For example, we must give information in response to a valid demand, search warrant or other legal enquiry or order. We may also disclose information to an investigative body in the case of a contravention of law as this helps prevent money laundering, fraud or other criminal activity. We will keep personal information only as long as necessary for the identified purposes.

6. Accuracy

We will keep personal information as accurate, complete and up-to-date as necessary for the identified purposes. You must play an active role in helping us do this by providing prompt notification of any changes, for example, to addresses or telephone numbers.

7. Safeguarding Personal Information

We will protect personal information with safeguards and security measures appropriate to the sensitivity of the information.

8. Openness

We will make readily available to individuals specific information about our policies and practices relating to the management of personal information; a copy of our Privacy Policy will be provided upon request and is available on our website.

9. Access

When requested in writing, we will tell you what personal information of yours we have, what it is being used for and to whom it has been disclosed. When requested, we will give you access to your personal information. There may be a charge for us providing this information to you, however, you will be notified of the approximate costs in advance. In certain situations we may not be able to give you access to all of your personal information; for example, when it is prohibitively costly to provide the information, when access would reveal information about a third party (ie: joint account), when information is protected (ie: solicitor-client privilege), when access would reveal confidential commercial information, when access would threaten the life or security of another individual, when access would reveal information generated in the course of a formal dispute resolution process, or when access would reveal information

gathered for purposes related to investigating a breach of an agreement or a contravention of the law. We will explain the reasons for this lack of access when asked. You may challenge the accuracy and completeness of your personal information and have it amended, as appropriate.

10. **Complaints and Questions**

You may challenge our compliance with our own Privacy Code by contacting the Bank's Privacy Officer. We will investigate the complaint and try to resolve it. If you are not satisfied with how the complaint has been handled, you may follow the Bank's [dispute resolution](#) process. You may also contact The Office of the Privacy Commissioner of Canada at Place de Ville, 112 Kent Street, 3rd floor, Ottawa, Ontario K1A 1H3, or call that office toll-free at 1-800-282-1376. 🌞