

Privacy Statement



Do more. Be more. Achieve more.

Privacy Statement

Revised July 2023

DUCA Financial Credit Union Ltd. (“DUCA”, “we”, “us” or “our”) is committed to protecting the privacy and confidentiality of your personal, business, and financial information and operates in strict accordance with Canada’s Personal Information Protection and Electronic Documents Act (PIPEDA). This Privacy Statement applies to the collection, use, or sharing of any personal information collected by DUCA in the course of conducting its business and will continue to apply for so long as we may hold your information (including for a reasonable time after the termination of your relationship with us, or as required by regulation.) DUCA will not collect, use, or disclose your personal information without your consent, except where required by law, or sell your personal information to third parties. By providing us with information, you are consenting to the collection, use or sharing of your information as set out in this Privacy Statement.

Important terms

To help you understand our Privacy Statement, here are some important terms you should know.

“**DUCA affiliates or subsidiaries**” means DUCA’s, affiliates and , subsidiaries such as Continental Currency Exchange Canada Ltd.(CCE) and DUCA Impact Lab (DIL)

“**Program partners**” means companies we have carefully selected to provide benefits, products or services under, or to participate in, a DUCA partner program.

Compliance with Privacy Legislation

In developing this statement, DUCA has adopted the Canadian Credit Union Code for the Protection of Personal Information (the “Code”) which is based on the principles set out in Schedule 1 of the Personal Information Protection and Electronic Documents Act (PIPEDA).

Accountability

Each and every one of our employees is responsible for maintaining and protecting the Personal Information to which they have access and for compliance to these principles. DUCA has designated a Privacy Officer who is accountable for overseeing privacy governance.

For any privacy-related inquiries or concerns, please feel free to reach out to the Privacy Officer at privacy@duca.com.

Identifying Purposes

Before or at the time we ask you for personal information, we will identify the purposes for which it will be used or disclosed. We may ask for information about your identity, credit, transactions, your application, financial behavior, or other details particular to the product or service. We only collect the Personal Information that is necessary for us to serve you as a Member, to administer our business, and to comply with application laws and regulatory requirements. If a new purpose for using or disclosing your Personal Information develops, we will ask you for your consent. We will only use or disclose your Personal Information for the reason(s) it was collected.

For more details on the types of information collected and the purposes for collecting such information, please see the FAQ section below.

Consent

We require your knowledge and consent for the collection, use or disclosure of Personal Information, except where permitted or required by law. We will not, as a condition of the supply of a product or service, require an individual to consent to the collection, use, or disclosure of information beyond that required to fulfil the explicitly specified, and legitimate purposes.

For more information on the methods of obtaining consent and how you may refuse/withdraw consent, please see the FAQ below.

Limiting Collection

We will only collect personal information that is necessary to carry out the purposes identified within in this Privacy Statement or any other purpose that may arise, provided that your consent has been obtained or it is required by law.

Limiting Use, Disclosure, and Retention

We will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the Member or as required by law. Personal information will be retained only as long as necessary for the fulfilment of those purposes. DUCA has procedures governing the secure destruction of personal information that is no longer required.

Accuracy

We will take reasonable measures to ensure that personal information is as accurate, complete, and up to date as is necessary for the purposes for which it is used. If there are any changes to your personal information that DUCA should be made aware of (e.g., changes to address and contact information), it is your obligation to notify DUCA as we do not routinely update personal information unless necessary for the specified purposes.

Safeguards

DUCA will protect personal information with security safeguards that are appropriate to the sensitivity of the information, guarding against loss, theft and unauthorized access, disclosure, copying, use, or modification.

For more information on specific security measures, please see the FAQ below.

Openness

This Privacy Statement which outlines DUCA's management of personal information will always be made readily available to Members and the public either through the DUCA website or in physical branch locations.

Individual Access

Upon request, you will be given access to information relating to the existence, use, and disclosure of your personal information except where this is not possible, such as situations where the information is, contains references to other individuals, cannot be disclosed for legal, security, or commercial proprietary reasons, or is subject to solicitor-client or litigation privilege.

You can challenge the accuracy and completeness of the information and it will be amended as appropriate.

Challenging Compliance

If you would like to challenge DUCA's compliance with PIPEDA and any of the 10 fair information principles, you are able to do so by contacting DUCA's Privacy Officer at privacy@duca.com.

For more information on inquiries, complaints, and challenging compliance, please see the FAQ below.

Frequently Asked Questions (FAQ)

Who does this Privacy Statement apply to?

This Privacy Statement applies to any person who requests, subscribes, or offers to provide a guarantee for any of our products or services. This includes individuals carrying on business alone or in partnership with other individuals and signing officers of our business customers. It is intended to help you better understand the following:

- Why we collect Member information,
- What information we collect from Members,
- Who we disclose Member information to,
- How we protect Member information,
- Accessing, updating, and removing your Personal Information, and
- Providing or withdrawing your consent to our collection and the use or disclosure of your Personal Information in accordance with this Privacy Statement.

What types of Personal Information does DUCA collect?

Personal Information that we may collect from you includes:

- a. **Information you provide.** When you enquire about or use our products and services, we may need you to provide us with Personal Information including:
 - i. **Identification information.** At the beginning of and during the course of our relationship, we will collect your name, address, phone number, email address, date of birth, citizenship, and employment information such as occupation and employer.
 - ii. **Social Insurance Number.** If you request products or services that may generate interest or other investment income, we will ask for your Social Insurance Number for revenue reporting purposes in order to comply with the Income Tax Act (Canada). We may also ask for your Social Insurance Number to aid in identifying you. In such cases the provision of your Social Insurance Number to us is optional. If you would prefer not to provide your Social Insurance Number for identity verification purposes, please visit a branch for account opening rather than using the online account opening application, which uses the Social Insurance Number to identify you. Note that the use of your Social Insurance Number is the best way to verify that information received from credit bureaus pertains to you. The wrong information could lead us to draw incorrect conclusions about you.
 - iii. **Credit information.** If you apply for a credit card, line of credit, loan, mortgage, or other credit facility, or a deposit account with overdraft protection, hold, and/or withdrawal or transaction limits, we will obtain information and reports

about you from credit reporting agencies and other lenders at the time of and during the application process, and on an ongoing basis, to review and verify your creditworthiness and/or to establish credit and hold limits.

- iv. **Financial information.** We may ask you to provide us with financial information about yourself in order to ensure the advice we give is appropriate for you and/or the investments you purchase are suitable for your circumstances.
 - v. **Health information.** If you apply for, request pre-screening for, or make a claim under an insurance product that we insure, reinsure, administer, or sell, we may, if necessary, collect, use, disclose, and retain health-related Personal Information about you. We may collect this information from you or any health care professional, medical-related facility, insurance company, or other person who has knowledge of your Information. We may also obtain a personal investigation report. We may use this information to ensure that you are eligible for insurance coverage, to administer your insurance, to investigate and adjudicate your claims, and to help manage and assess our risks.
 - vi. **Marketing information.** We may contact you to better understand your financial needs and activities so that we may tell you about other products and services that may be of interest to you; to determine your eligibility to participate in contests, surveys, and promotions; to conduct research and surveys to assess your satisfaction with us as a Member; and to develop products and services to meet your needs.
 - vii. **Your relationship with us.** We will collect information arising from your relationship with and through us and your use of our products and services. For example, we will maintain a record of your account balance(s), transaction history, and payment history. As well, when you send us an e-mail, speak with one of our telephone service representatives, communicate with us in person or through any other means, we may monitor, record, and retain those communications for our mutual protection and in order to process your inquiries, respond to your requests, and improve our services. We may also use video recording in and around our physical premises and ATMs to ensure your safety and ours and to prevent against fraud and other illegal activity.
- b. **Information collected via cookies.** When you visit our website, we may use a cookie to track information about your browser's activities and to provide you with better services and features on our website. The types of cookies that we may use are "session cookies" and "persistent cookies".
- i. **Session cookies.** Session cookies store information only for the length of time that you are connected to a website – they are not written onto your hard drive. Once you leave the website, they expire and are no longer active. We use session cookies to record certain information from your browser including your Internet Protocol (IP) address, browser type, internet service provider (ISP), referring or exit pages, operating system, and the dates and times that you visit our website. Additionally, we may record certain information regarding your use of features on our website. Session cookies allow us to gather statistical data which provides insight into how we may improve our products and services and to identify your current session to our web server.
 - ii. **Persistent cookies.** Persistent cookies store information on your hard drive and can be re-read when you return to the site that placed them on your hard drive. We use persistent cookies to help us verify you as our client, to remember your preferences, and to help block unauthorized attempts to access your Personal Information.
- Rejecting cookie.** You may adjust your browser settings to notify you when a cookie is about to be sent or you may configure your browser to refuse cookies automatically. Please review your web browser's "Help" file to learn the proper way to modify your cookie settings. However, without cookies you will not have access to certain services and features on our website that rely on cookies for their functionality.
- Location information.** We may collect and store information about your location if you enable your computer or mobile device to send us location information. You may be able to change the settings on your computer or mobile device to prevent it from providing us with such information.
- c. **Information from other sources.** When necessary, we may collect Personal Information about you from third parties, including:
- i. Government agencies and registries, law enforcement authorities, and public records,
 - ii. Credit reporting agencies,
 - iii. Other financial institutions,
 - iv. Other service providers, agents, and other organizations with whom you make arrangements,
 - v. Employers and personal references you provided, and
 - vi. Persons authorized to act on your behalf under a power of attorney or other legal authority.

When we obtain Personal Information from a third party, we will record the source of that information.

For what purposes does DUCA collect, use and, disclosure Personal Information?

DUCA may collect, use, or disclose personal information in order to verify your identity; evaluate and process your applications, claims, accounts, transactions, and reports; provide you with ongoing service; analyze your financial needs and activities; improve and develop products and services to meet your needs; recommend products and services to you from DUCA or DUCA partners; contact you regarding your

subscribed products and service, manage and assess our risks, operations and relationship with you; help protect you and us against fraud, error, and other illegal or unauthorized activities; and comply with applicable laws and regulatory requirements.

If we need to collect Personal Information for any other reason, we will identify that purpose.

How does DUCA obtain consent related to my Personal Information?

Depending on the situation and the sensitivity of the information, we may obtain your consent for the collection, use, or disclosure of your Personal Information in different ways. Express consent may be obtained verbally, electronically, or in writing from you or your authorized representative (such as a legal guardian or attorney appointed pursuant to a power of attorney). Implied consent may be obtained through your use or continued use of a product or service or when you approach us to obtain information or inquire about or apply for products or services from us.

Are there any exceptions to the requirement to obtain consent?

There may be exceptions to general consent requirements in certain limited circumstances, such as the following:

- Legal, medical, or security reasons make it impossible or impractical to seek consent.
- Seeking consent when information is being collected for the detection or prevention of fraud or for law enforcement may defeat the purpose of collecting the information.
- Seeking consent when the individual is a minor seriously ill, or mentally incapacitated may be impossible or inappropriate. In these situations, consent may have to be obtained from a legal guardian (in the case of minors), an attorney acting on behalf of the individual (under a Power of Attorney arrangement), or from the Office of the Public Guardian and Trustee.

Further exceptions surrounding the collection, use, and disclosure of information without consent are outlined in s.7(1)-7(5) of the Personal Information Protection and Electronic Documents Act.

What do I need to know about refusing or withdrawing my consent?

In most cases, you may refuse to provide your consent to our collection, use, and/or disclosure of your Personal Information in accordance with this Privacy Statement. However, if you refuse to provide your consent or withdraw your consent, this may affect our ability to provide products and services or fulfil our commitment to you.

You may withdraw your consent provided that: you provide reasonable notice; we are not legally required to collect, use, or disclose your information; withdrawing your consent does not impede our ability to fulfill your contract with us; and your consent does not relate to a credit or insurance product we have granted you where we are required to collect and exchange your Personal Information on an ongoing basis after credit has been granted, an application has been underwritten, or a claim has been adjudicated.

You may withdraw your consent by contacting the branch or office where your account is held or by calling us on 1 (866) 900-DUCA (3822). Our staff will be pleased to explain your options and any consequences of refusing or withdrawing your consent and will record your choices.

Withdrawal of consent must ultimately be provided by you in writing.

How does DUCA protect my Personal Information?

DUCA takes the protection of Personal Information very seriously. Below are some of the measures in place to safeguard your information:

- Physical and technological security safeguards.** We make commercially reasonable efforts to safeguard your Personal Information from loss or theft, unauthorized access, disclosure, duplication, use or modification through security measures appropriate to the sensitivity of the information. These measures include internal reviews of our data collection, storage, and processing practices and security measures which include appropriate encryption and physical security measures to guard against unauthorized access to systems where we store Personal Information.
- Password.** Your account and Personal Information are protected by a password for your privacy and security. Your password and other access codes are private and confidential – our employees cannot gain access to them and will not ask you to reveal them. It is your responsibility to use your best efforts to prevent unauthorized access to your account and Personal Information by selecting your password appropriately and limiting unauthorized access to your computer, browser, and mobile platform.
- Confidentiality obligations.** We restrict access to your Personal Information to our employees, contractors, and vendors and service providers who need to know that information in order to process it on our behalf or to provide our products and services to you. Our employees, contractors, and suppliers are bound by confidentiality obligations and may not use the information for any unauthorized purpose. Our employees may be subject to discipline, including termination and criminal prosecution, if they fail to meet their obligations described in this Privacy Statement. Our suppliers are required to protect your Personal Information in a manner that is consistent with this Privacy Statement.

To whom might my Personal Information be shared and when?

We will only use or disclose your Personal Information for the reason(s) it was collected. Parties who may receive your information include:

- a. **DUCA's subsidiaries or affiliates.** We may share your Personal Information, other than your health information (which may be collected in conjunction with or as part of your purchase of insurance products), with **DUCA's subsidiaries or affiliates** for legal and regulatory purposes, to manage credit risk and other business risks, to perform analytics, to ensure we have correct and up to date information about you, and to the extent necessary if you have requested a product or service that is jointly offered by more than one Member of the DUCA Group.
- b. **Vendors and service providers.** We may use other companies to provide services on our behalf. These companies will be given only the information needed to perform those services. We have contracts in place holding these companies to the same standards of confidentiality by which we are governed. Our suppliers may perform activities outside of Canada. As a result, your information may be securely used, stored, or accessed in other countries and may be subject to the laws of those countries. These companies may be required to disclose your Personal Information in response to valid demands or requests from governments, regulators, courts, and law enforcement authorities in those jurisdictions or countries.
- c. **DUCA Partners.** We may share your information with a limited list of approved partners with whom DUCA works to provide Members with a full range of financial services. This includes but is not limited to CUMIS Services Inc., with which DUCA has partnered to offer home and auto insurance and Collabria Financial Services Inc. which provides credit card services to the central credit union that DUCA is a part of.
- d. **Other third parties.** We may share your Personal Information with third parties in order to allow us to evaluate and process your applications and to allow such third parties to properly answer questions when providing us with information about you. Depending on the product or service that you request or subscribe for, we may share your Personal Information with government agencies and registries, law enforcement authorities and public records, health-care professionals, medical-related facilities, insurance companies, real estate appraisers, your past or present employers, credit reporting agencies, or other financial institutions or persons who have knowledge of your Personal Information. We may also share your Personal Information with any parties involved in the securitization, assignment, or pledge of a loan or mortgage that is obtained through us.

Credit bureaus: Where you hold a credit product such as credit card, loan, line of credit or mortgage with DUCA we will exchange information about you with credit bureaus at the time of application and on an ongoing basis for as long as you hold the product and for a reasonable time afterwards, or as required by regulation. We may collect, use and share this information to assess your application for credit, verify your creditworthiness, assess and manage our credit risks and improve products and services, establish credit and hold limits, qualify you for other products and services, and detect and prevent fraud, or other illegal activities. Additionally, DUCA may disclose your information to third parties under the following circumstances:

- a. **Merger or sale.** In the event we are acquired by or merged with a third-party entity, or if we sell a part of our business, we reserve the right to transfer or assign the Personal Information we collected from you as part of such merger, sale, or change of control. . As personal information associated with any accounts, products or services of the business being purchased/sold/merged will typically be included in such transactions, DUCA 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.
- b. **Where required by law.** We may disclose your Personal Information if we have a good faith belief that access, use, preservation, or disclosure of such information is reasonably necessary to satisfy any applicable law, regulation, self-regulation, legal process, or enforceable governmental request. When we provide information in response to a legal inquiry or order that we believe to be valid, we disclose only the information that is legally required. Note that we may process your Personal Information on our servers in Ontario, Canada and in other countries as may be necessary. In such cases, your Personal Information may be disclosed in response to valid demands or requests from governments, regulators, courts, or law enforcement authorities in those jurisdictions or countries.
- c. **Protection of our interests.** We may also disclose your Personal Information if we believe, in good faith, that it is appropriate or necessary to take precautions against liability; to help us collect a debt or enforce an obligation owed to us by you; to protect against fraudulent, abusive, or unlawful uses; to investigate and defend ourselves against any third-party claims or allegations; to assist government enforcement agencies; to protect the security or integrity of our products and services; or to protect the rights, property, or personal safety of our customers, employees, or others.

- d. **Consent is provided.** We may disclose your Personal Information where you have authorized us to do so. For example, we may share your information with those that you share ownership or liability of a product or service and, if you authorize us, we may provide your information to your lawyer, accountant, or other people or entities you identified.

If we disclose Personal Information for a non-routine purpose other than those specified above, we will keep a record of what, when, why, and to whom such information was released.

What are my options when it comes to privacy preferences?

There are several privacy preferences available to you, subject to legal, business or contractual requirements, including:

- a. **Direct marketing.** During the registration process for our products or services, you will be asked to indicate whether you consent to receiving information that may be of interest to you through various channels including direct mail, telephone, electronic, or other means. You may opt out of receiving such communications from us at any time by clicking on the "unsubscribe" link in any such electronic messages, by making a modification on your account settings page, or by contacting us. Your request will be given effect within 10 days; however, any marketing campaigns that are already underway may not immediately take your preferences into account.
- b. **Sharing with DUCA's subsidiaries or affiliates.** We may share your Personal Information with **DUCA's subsidiaries or affiliates** for: fraud or crime prevention, suppression or detection; to meet regulatory, legal, or reporting requirements; to manage credit risk and other business risks; to perform analytics; to ensure that we have correct and up to date information about you; and to the extent necessary if you have requested a product or service that is jointly offered by more than one member of the DUCA Group. You may not withdraw consent for disclosure of information for fraud or crime prevention, suppression, or detection, or where the disclosure is required by law. We may also share your information to better manage your total relationship with **DUCA's subsidiaries or affiliates** and enable other members of **DUCA's subsidiaries or affiliates** to bring suitable products and services to your attention. We may share your information within **DUCA's subsidiaries or affiliates** for these purposes unless prohibited by law or you tell us not to.
- c. **Credit bureaus.** In order to provide a credit product or service to you, we must obtain your consent to exchange information about you with credit bureaus. Once you have a credit product with us, we will share your credit experience on an ongoing basis with other lenders and credit reporting agencies. You cannot withdraw your consent for this sharing of information as it is necessary to support the credit process and helps maintaining the accuracy and integrity of the credit reporting system.
- d. **Insurance Services Bureau and Medical Information Bureau.** In order to provide an insurance product or service to you, we must obtain your consent to exchange information about you with the Insurance Services Bureau and the Medical Information Bureau. Once you have an insurance product with us, we will share your claims and insurance history with the Insurance Services Bureau and Medical Information Bureau. You cannot withdraw your consent for this sharing of information as it is necessary to support the data integrity of the insurance industry and the underwriting record.
- e. **Program partners.** We may share Personal Information with program partners and our suppliers, agents, and other organizations that perform services for us or on our behalf to the extent necessary to provide and administer the products and services that you have with us. If you withdraw your consent for this sharing, we may not be able to provide you with the relevant product or service.

How can I access, update, or remove my Personal Information?

- a. **Accessing your Personal Information.** We make good faith efforts to provide you with access to your Personal Information. You may review or verify your Personal Information by reviewing your account statements or passbook updates, by visiting the branch or office where your account is held, or by accessing your account through our online or mobile banking platform. If you would like to find out to whom we have disclosed your Personal Information, you may contact the branch or office where your account is held. We may be unable to provide information about you from our records which contains references to other persons, is subject to legal privilege, contains confidential information proprietary to us, relates to an investigation of a breach of agreement or contravention of laws, or cannot be disclosed for other legal reasons. If we are unable to provide some of the Personal Information we hold about you, we will let you know the reason(s) why, subject to any legal or regulatory restrictions.
- b. **Updating your Personal Information.** We take care to keep your Personal Information as accurate, complete, and up to date as is necessary for the purposes for which it was collected. We do, however, rely on you to tell us when your Personal Information changes including your residential address. Most of your Personal Information may be updated by visiting the branch or office where your account is held or by accessing your account through our online or mobile banking platform. If you find any errors in our information about you, please let us know. If we do not agree with your request to change your Personal Information, we will make a record of your request and, if necessary, disclose it to third parties who also possess your Personal Information. If we agree with your request, we will make the correction(s) as soon as reasonably possible and make sure they are conveyed to anyone we may have misinformed.

- c. **Retention of your Personal Information.** We retain your Personal Information only as long as it is required for the reason(s) that it was collected. This length of time will vary depending on the product or service and the nature of the information and may extend beyond the end of your relationship with us. When your information is no longer needed for the purpose for which it was collected, we will destroy, delete, erase, or convert it to an anonymous form,
- d. **Fees for access and correction.** In any case where we provide information access and correction, we perform this service free of charge, except if doing so would require a disproportionate effort. We will advise you of any applicable fee prior to proceeding with your request.

What happens when there are changes to the Privacy Statement?

We may amend this Privacy Statement from time to time to reflect changes in legislation or other issues that may arise. We will post the revised Privacy Statement here on our website at <https://www.duca.com/security-privacy>. We may also make our Privacy Statement available at our branches or other premises or send it to you by mail. If you are concerned about how your personal information is used, you should check our website periodically to obtain a current copy of this Privacy Statement. Your continued provision of personal information or use of our services following any changes to this Privacy Statement constitutes your acceptance of any such changes.

Who do I contact if I have an inquiry or complaint?

If you have any questions or comments about this Privacy Statement, please feel free to contact the branch or office where your account is held, or you may call us at 1 (866) 900-DUCA (3822).

You may also contact our Privacy Officer:

Mail: DUCA Financial Services Credit Union Ltd., ATTN: Privacy Officer
5255 Yonge Street, 4th Floor,
Toronto, Ontario M2N 6P4

Email: privacy@duca.com

We will investigate and respond to any questions, concerns, and comments you may have in respect of any aspect of our handling of your Personal Information.

If you are not satisfied with our response to your inquiries, you may contact the Office of the Privacy Commissioner of Canada:

Mail: The Office of the Privacy Commissioner of Canada
30 Victoria Street
Gatineau, Quebec K1A 1H3
Telephone: 1-800-282-1376 / 819-994-5444
TTY: (819) 994-6591
Website: www.priv.gc.ca