

## HOMEEQUITY BANK: PRIVACY NOTICE

### Revised January 2024

At HomeEquity Bank (“**HomeEquity**”, “**we**”, “**us**”, “**our**”), we value the trust you place in us and are committed to protecting your privacy and the security of your personal information. To ensure we meet this commitment, we describe in this “**Privacy Notice**” how we collect personal information from you, what we use it for, who we share it with and how we protect it. We also explain what your rights are in respect of your personal information and how you may exercise those rights.

When we use the term **personal information**, we mean any information that could be used, either alone or in combination with some other kind of information, to identify you. This includes information like your name, address and date of birth, but could also include information like the amount of money we loan you or your credit score. We describe, in detail, the types of personal information we collect from you in this Privacy Notice.

This Privacy Notice applies to all of your interactions with us. This includes when we provide you with any of our products or services, or even when you call or email us to inquire about our products or services. It also includes your interactions with our websites, [homeequitybank.ca](http://homeequitybank.ca), [chipadvisor.ca](http://chipadvisor.ca) and [chip.ca](http://chip.ca) (the “**Sites**”). This Privacy Notice applies for as long as we hold your personal information, even after the end of our relationship.

We have indicated, at the top of this page, when we last updated this Privacy Notice. We may update it again in the future. In some cases we may notify you when we make those changes, but we otherwise encourage you to occasionally review this Privacy Notice so that you are aware of any changes we make.

#### 1. **What personal information do we collect?**

***We may collect personal information that is necessary to provide you with our products and services, to operate our business or to meet our legal obligations.***

Please review the table below, which describes the different types of personal information that we may collect from you and how we may use that information. We won’t always collect all of these types of personal information, but will do so as necessary depending on the nature of our relationship.

[Learn more about how we use your personal information.](#)

Contact and identification information	<ul style="list-style-type: none"><li>• First and last name</li><li>• Email and mailing address</li><li>• Telephone number</li><li>• Date of birth</li><li>• Gender</li></ul>
Identification and authentication information	<ul style="list-style-type: none"><li>• Passwords and personal identification numbers (PINs)</li><li>• Answers to your security questions</li></ul>

	<ul style="list-style-type: none"> <li>Government identifiers (passport number, driver's license etc.)</li> </ul>
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Information about your communications with us	<ul style="list-style-type: none"> <li>Information about your appointments with our representatives</li> <li>Summaries of your communications with us prepared by our representatives</li> <li>Emails between us</li> <li>Your responses to surveys or other request for feedback</li> <li>Recordings of your calls to our customer service agents</li> </ul>
Financial information	<ul style="list-style-type: none"> <li>Employment and financial history</li> <li>Net worth or source of wealth</li> <li>Credit rating and report</li> <li>Information about your home (value, appraisals etc.)</li> <li>Information about your financial goals</li> </ul>
Information about your HomeEquity products or services	<ul style="list-style-type: none"> <li>Information on balances and deposits</li> <li>Information on your transactions and operations (accounts, contract numbers, dates and amounts, description, etc.)</li> <li>Information on products held (type of product, date obtained, terms, payment methods, etc.)</li> </ul> <p>Authorized account users</p> <ul style="list-style-type: none"> <li></li> </ul>
Information about other people (which may include their name, address, and identification)	<ul style="list-style-type: none"> <li>Beneficiaries, spouses, common-law partners, dependents, and/or influencer/trusted contact named in one of our products or services</li> <li>Names of powers of attorney for property or care</li> </ul>
Information on communication choices and preferences	<ul style="list-style-type: none"> <li>Language and communication preferences</li> <li>Your preferences on how we do business with you, or what types of products or services you might be interested in</li> </ul>
Other information to enable HomeEquity to comply with its legal obligations, including to confirm identity and verify age	<ul style="list-style-type: none"> <li>Driver's licence and/or passport information</li> <li>Government-issued photo identification</li> <li>Social Insurance Number (SIN)</li> <li>Taxpayer Identification Number (TIN)</li> </ul>

	<ul style="list-style-type: none"><li>• Results of anti-money laundering, cybercrime, fraud or other audits</li></ul>
Information about how you use the Sites or other digital channels	<ul style="list-style-type: none"><li>• Please see how we automatically collect your information <a href="#">below</a>.</li></ul>
Security and crime prevention or investigation	<ul style="list-style-type: none"><li>• Images or video collected via our CCTV cameras in our building lobby</li></ul>

2. **How do we collect your personal information?**

***We collect your personal information directly from you, from third parties, or automatically using technological means.***

We collect personal information in three ways: (a) directly from you; (b) from third parties; or (c) automatically using technology when you interact with the Sites or our other digital channels.

(a) **Directly from you**

When you want to obtain a HomeEquity product or service or when you communicate with us, regardless of the method used (e.g. by telephone, email, mail or in response to a survey) we may ask you to provide information about yourself. The same goes if you contact us to inquire about our products and services.

If you purchase our products or services, we may ask you to provide whatever personal information we need to provide you with the product or service. This may include information required to become a customer, such as your contact and identifying information, as well as financial information. Typically, we will ask you to complete paperwork that includes the necessary information. In these cases, we may also ask you to provide information about another individual, such as your spouse, dependents, or beneficiaries.

If we have an existing business relationship, we may collect personal information in order to identify and authenticate you – for example, by asking you to answer security questions or provide your PIN.

(b) **From third parties**

Depending on the situation, we may need to collect personal information about you from other individuals, organizations or entities. In order to assess your application, verify your identity and your creditworthiness, qualify you for products and services, protect against fraud, money laundering activities and to manage our risks and legal obligations, we may collect information about your current and past credit accounts such as type, amount, payment history, debt collections, legal proceedings, or other information that the credit bureau has collected from your other lenders from credit bureaus, such as your credit score. We may also collect information about the property you wish to borrow against from title search companies and property appraisers, which we use to manage our risk and provide you with our products and services.

To verify your ownership of your property, we may collect information about your property from public registries such as land or property registries.

(c) **Through automatic means**

When you use the Sites, we may automatically collect some types of personal information. We typically collect this kind of information using “cookies” or other similar technologies such as “tracking pixels”. A cookie is a text file or piece of data a website stores on your device when you visit a web page. Cookies can be used to record your internet browsing activity and to personalize your online experience when you search for information. Tracking pixels can also be used to check if you have accessed content, monitor web traffic and provide information similar to cookies. Below, we describe how we use cookies and similar technologies.

(i) **Persistent cookies**

We use persistent cookies to measure site usage, including browsing behaviour. We do this to improve how the Sites works and to measure the effectiveness of the Sites and our communications. For example, we use persistent cookies to track which parts of the Sites you visit, which of our online marketing ads you click and your response rate, and the keywords you searched to find our Sites. If our ad is on a thirdparty site, we may collect the address of the site where you click the ad, but we don't track or create a profile of your activity on third-party sites.

(ii) **Session cookies**

Software applications may create cookies to store configuration information on your computer. These cookies allow you to view videos or other rich media on our Sites. Some of our online tools, such as our reverse mortgage calculators, use cookies to save the information you enter, such as mortgage amount and interest rate, so you don't have to re-enter this information each time you use the tool.

(iii) **IP addresses**

We may collect your IP address, which is the address your device is given by your internet service provider, which we use to determine your general location (such as the city you're in). We use this location information for marketing or to offer our products and services. [You have choices regarding your location information.](#)

3. **How do we use your personal information?**

***We mainly use your personal information in order to provide you with our products and services and communicate with you, but we may also use it to manage our business. We give you the option to opt out of our use of your personal information for our own purposes. We also use your personal information to comply with our regulatory obligations.***

We may use your personal information to:

(i) **Provide you with products or services**

- Establish and confirm your identity and determine if you are eligible for products and services
- Review your financial situation
- Make sure the advice, products and services we offer to you are appropriate for you

- Set up and manage your products and services

**(ii) Communicate with you**

- Send communications to you by mail or email, or to call you, in order to provide you with the products or services or let you know about products, opportunities, products or services that you might be interested in. [You can choose](#) to stop receiving marketing communications from us.

**(iii) Manage our business**

- Perform our everyday business and operations, such as meeting our contractual obligations, record-keeping and internal reporting.
- Understand and better manage our business.
- Conduct business transactions, such as acquisitions, divestitures, partnerships and joint ventures.
- Insure, reinsure or otherwise protect our interests in our product and services portfolio.
- Manage our credit, business and other risks so that HomeEquity operates as an effective, efficient and financially prudent financial institution.
- Meet tax, legal and regulatory obligations.
- Protect you and us from error and criminal activity, including preventing, detecting and investigating fraud, money laundering, cyber threats and other such risks and threats.

**(iv) Provide you value**

- Personalize your experience with us by analyzing data, which includes reviewing and analyzing your products and other information to:
  - Understand who you are, your financial needs and activities, and the products, services, promotions, offers and advice that may be of interest to you
  - Predict or generate insights about your needs and preferences
  - Target or personalize products, services, promotions, offers, advice, tips and articles based on information that we have collected, including information collected through your activities the Sites
  - Use de-identified data such as transaction data and demographics to help personalize ads and offers on third party websites
- Promote and market products and services offered by HomeEquity
  - This includes marketing HomeEquity's products, services or community initiatives on another company's site. For example, if you show interest in a specific HomeEquity

product or service when using our Sites, we may present you with an ad for that product or service on another company's website. This is sometimes called "remarketing."

- We may tailor our marketing and promotions using information such as your browsing behaviour on the Sites or third-party sites with HomeEquity ads, your HomeEquity products and services, and the information you have given us.
- For information on how to manage your marketing preferences, "[What are your privacy choices?](#)"

**(v) Automated Decision Making**

In some instances, we may use technology that automatically makes decisions about you using your personal information. For example, we may use automated credit adjudication tools to make a real-time decision on whether to approve your application, making the application process faster. [You may have rights regarding our use of this kind of technology.](#)

**4. Who do we share your personal information with?**

***We may share your personal information with third-party service providers who help us provide you with products and services and communicate with you. We may, in some cases, also disclose your personal information to third-parties with whom we do not have any contractual relationship, primarily to ensure that you qualify for our products and services and to discharge our regulatory obligations.***

We may share your personal information in the following ways:

**(a) With service providers**

In some cases, we may use third-party service providers to help us to provide you with our products and services, and may share some of your personal information with them as follows:

<b>Service Providers</b>	<b>Types of Transferred Information</b>	<b>Purpose for Transfer</b>
Printers	Information about your accounts with us, including your identification and contact information  If you are not already a customer, we may provide your contact information so we can send you marketing materials.	To mail you statements, letters and cheques  To mail you marketing materials and offers.

Information technology, cloud and web-hosting services	Any information that we store in digital format	To help us store, compile, and organize your information and provide you with access to the Sites  To help facilitate electronic documents and signatures
Providers of insurance services and other property services	Information about your accounts with us, including your identification and contact information	To provide or confirm title insurance on properties, or to protect our loan portfolio
Providers of legal services	Information about your accounts with us, including your identification and contact information	To provide anti-money laundering and fraud screening services  To obtain legal advice  To protect our interests in the event of default
Payment processors	Your financial information, specifically amounts paid to or by you	To facilitate sending and collecting funds
Advertising and marketing agencies	Contact information, information about your preferences	To facilitate marketing and promotional activities

**(b) With analytics and advertising partners**

We may share information with analytics and advertising partners to better understand how our clients use our products and services and to personalize advertising based on your preferences and interests. These partners also measure how well our marketing and ad campaigns are working and help us improve them. These partners may use web technologies, such as cookies, to collect information about your activities on the Sites and on third-party sites. [You can manage your marketing preferences.](#)

We may collect and use information about your relationship with us to help decide which ads or offers to present to you and to identify other people with similar interests on the websites of companies who help us advertise. For example, we may match your masked contact information with social media or other sites and, if you are a member of that site, use it to show you or others with similar interests our ads. Those sites may track how you interact with our ads. We won't do this if you have opted out of receiving marketing from us or have opted out of relationship-based ads with your social media or webmail sites. You can go to those sites to review your settings.

**(c) With other third parties**

Depending on the circumstances and the products and services you hold, we may disclose your personal information to third parties for the following purposes:

- Credit reporting agencies – we may share your credit and financial information with credit bureaus to help maintain the accuracy and integrity of the credit reporting system, who will incorporate the information into their consumer reporting databases in compliance with applicable law; and
- Governments, regulators, self-regulatory bodies – for the purpose of complying with our regulatory obligations as a regulated financial institution.

When we disclose your personal information to these third parties, the information we provide to them is then handled by them in accordance with their own privacy policy. If you have concerns about their handling of your personal information, you should contact them directly. You may contact us for a list of specific entities to which we have disclosed personal information.

**(i) Representatives and beneficiaries**

We may share information with and take instructions from someone who has proper authorization to act as a representative for you, such as a legal guardian, person with power of attorney, estate representative, lawyer or accountant. If representatives are jointly appointed, we share information as instructed by either representative.

Following your death, we may share your information with your beneficiaries or estate representatives where necessary to help administer your registered plans or insurance products, or your estate's financial affairs.

**(ii) Disclosure without your consent**

In certain narrow circumstances, the law permits us to disclose your personal information without your consent. For instance, we may disclose your personal information to government, regulatory or law enforcement agencies as requested by these agencies, if we have a good faith belief that the disclosure is required or permitted by law.

Further, we may disclose your personal information:

- To protect the rights, property and interests of HomeEquity, including intellectual property rights;
- To prevent, detect or suppress financial abuse, fraud, and criminal activity;
- To investigate potentially illegal or suspicious activity; or
- To manage, defend or settle any actual or potential loss.

In these cases, we may disclose your information, individually or pooled with other people's information, to any person or organization, investigative body, fraud prevention agency, regulatory or government body, person who operates a database or registry used to check or verify your information, insurance companies or financial or lending institutions

We may also disclose your personal information:

- During emergency situations or where we reasonably believe it is necessary to protect the safety, health or security of a person or group; or
- Where the personal information is publicly available as determined by law.

**(iii) Business Transactions**

We may also transfer or assign your personal information to third parties because of, or in connection with a sale, merger, consolidation, change in control, transfer of assets, reorganization, or liquidation. This includes when we are contemplating such a transaction for due diligence purposes.

**5. How do we keep your personal information safe?**

***Our Privacy Officer has established an information security program designed to protect your personal information in accordance with industry standards.***

We have established and implemented governance policies and practices regarding the protection of personal information. These policies and practices are proportionate to the nature and scope of our activities and are approved by our Privacy Officer. For instance, we have policies and procedures to:

- prevent unauthorized access to your personal information;
- define the roles and responsibilities of the members of its personnel throughout the life cycle of the personal information;
- respond to privacy questions, complaints, or breaches (see below);
- limit the use of your personal information to the purposes communicated to you;
- honour the choices you made about your personal information;
- retain your personal information for the period we need it to serve you and manage our business and legal obligations;
- securely destroy your personal information or convert it to an anonymous form after the time we don't need it; and
- help make sure that any service providers or agents who handle your information on our behalf, in Canada or elsewhere, protect that personal information.

We review our procedures and security measures on a regular basis. We do this to help make sure that they remain effective and appropriate.

**6. Where is your personal information stored and for how long?**

***We only retain your personal information for as long as necessary to provide you with our products or services, or as otherwise required to meet our regulatory obligations. We securely dispose of your personal information after no longer needed.***

How long we keep your personal information depends on the type of information and the product or service it relates to. We keep your information for as long as we reasonably need it for customer service, legal, regulatory, and business purposes. For these reasons, we keep your information beyond the end of your relationship with us. When we no longer need your information, we securely destroy it or make it anonymous, following all applicable laws, so the information can no longer reasonably be used to identify you. We have record retention policies and schedules that set out retention periods depending on the type of information, and the process that must be followed when a retention period expires.

We may store your personal information at our head office, in computer systems, or in the record storage facilities of HomeEquity or our service providers.

We may store and process information in any country or province within Canada we have service providers, including countries outside of Canada, such as the United States, which may have different privacy regulations rules. If you are a resident of Quebec, this means your personal information may be stored outside of Quebec. As a result, your information may be subject to the laws of the specific province and/or country in which it is being stored and may be accessible to the governmental authorities of those jurisdictions.

## **7. What are your privacy rights?**

***You have the right to correct and access your personal information, or to withdraw your consent for use to collect, use or disclose your personal information.***

### **(a) Right to update or correct your personal information**

You have the right to update or correct personal information we hold about you if it is inaccurate, incomplete or outdated. We make every reasonable effort to keep the information in our records as accurate, complete, and up to date as necessary. However, we also rely on you to tell us when your information changes. Keeping your information accurate and up-to-date allows us to continue to offer you the highest quality service.

### **(b) Right to access your information**

You have the right to access personal information we hold about you. Much of your information is available to you on your paper or electronic account statements or by calling us on the phone.

If you want access to additional personal information we may hold about you, [please put your request in writing](#) and give us enough details to help us understand the information that you want to access. We must verify your identity before we start our search, or before we give you access to your information. We'll tell you if there is a fee to access your information. We may also ask you for more information to confirm the scope of your request, such as the time period or a more specific description of the information you want to access.

After we receive your written request, verify your identity and understand the scope of your request, we'll give you a written response to your access request within the timeframe set by applicable privacy law.

If you have a sensory disability, you may ask for your information in an alternative format. If we already have this format, we will provide it. Otherwise, we'll convert the information to the requested format if it is reasonable and in accordance with applicable privacy law.

There may be limits to your right to access your information. For example, if the information is subject to legal privilege, contains confidential commercial information, relates to an investigation of a breach of an agreement or law, or contains information about other individuals that cannot be separated.

If we have information about you that we got from others, you can ask us for the source of that information, subject to certain restrictions under applicable law. If you ask for it, and if legally permitted and required, we also give you certain details about how we handle your personal information, such as the types of third parties to whom we have, or may have, disclosed your information. However, this does not include service providers we have used to do work for us, reports to the Canada Revenue Agency, or information that has been provided for legal and regulatory obligations, except to the extent required by law.

If you ask for access to a credit report we got about you from a credit bureau, we'll give you a copy if we still have it on file. We also give you the name and address of the credit bureau we used, as they have the most current information and can explain how to read the report. You have the right to access and correct the credit bureau report directly with the credit bureau.

**(c) Right to withdraw your consent**

You can withdraw your consent (where you have provided it) to our collection, use and sharing of information at any time by giving us reasonable notice, subject to legal, business, or contract requirements. However, withdrawing your consent may limit or prevent us from providing you with specific products and services. For example, if you don't permit us to disclose your personal information to a title search company we will not be able to provide you with a secured loan.

**(d) For Quebec residents only**

If you are a resident of Quebec, you also have the right to request that we delete your personal information. We will fulfill your request, subject to any contractual or regulatory obligations that require us to retain the personal information.

You also have the right to ask for more information about our use of automated decision-making technology, which includes the personal information we used to render the decision, the reasons behind the decision, and the right to have any erroneous personal information used in that process corrected.

To exercise any of your rights over your personal information, please contact us at 1-866-313-2447 or [privacyofficer@heb.ca](mailto:privacyofficer@heb.ca).

**8. What are your privacy choices?**

***You have the choice to limit our use and disclosure of personal information that is not absolutely necessary to provide you with our products and services.***

During our relationship with you, we provide you with the following choices:

(a) **Social Insurance Number (SIN)**

Including your SIN in a credit bureau request is the best way to make sure we get accurate information about you from credit bureaus. This use of your SIN is optional and, if you choose not to give your permission, this by itself does not stop you from qualifying for products and services. We only use your SIN as part of credit bureau requests when qualifying you for products and services or reporting information to the credit bureaus. We don't use your SIN during ongoing exchanges with credit bureaus.

(b) **Marketing**

We may offer you products and services that may interest you, including special promotions. Your consent to receive marketing communications is optional and you can decide to withdraw it at any time.

Withdrawing your consent to receive marketing communications does not limit the information you receive through discussions with one of our representatives. We'll also continue to send you information related to your existing products or services, and as permitted or required by law. From time to time, we may also ask if you wish to update your marketing preferences to help ensure that our records are up-to-date and reflect your current preferences.

Please contact us at 1-866-313-2447 or [privacyofficer@heb.ca](mailto:privacyofficer@heb.ca) to update your marketing preferences.

(c) **Interest-based advertising**

Interest-based advertising uses information collected from your browsing behaviour to help predict what will interest you, and to present you with HomeEquity-related advertisements that are more relevant to you.

If you opt out of interest-based advertising, you may still get HomeEquity online advertising, but it won't be tailored to your preferences. The following are ways in which you can manage your preferences for interest-based advertising:

**Google Advertising**

We work with Google Advertising to provide interest-based advertisements. To opt out of interest-based Google advertisements, set your preferences using [Google Ad Settings](#). You can also opt out of Google Analytics with [Google Analytics Opt-out Browser Add-on](#).

**Facebook**

Your ad preferences page lets you adjust the ads you see while on Facebook and gives you the ability to update your ad settings to control information Facebook can use to show you ads. View and adjust your ad preferences: Facebook: <https://www.facebook.com/help/247395082112892>

**Microsoft**

Microsoft use your searches, past purchases of Microsoft products, and other online activity associated with both your Microsoft account and this browser to show you ads that are more personalized. You can opt out: Microsoft:

<https://account.microsoft.com/privacy/adsettings/signedout?ru=https%3A%2F%2Faccount.microsoft.com%2Fprivacy%2Fad-settings> **Taboola**

Taboola is a web-based platform that uses your browsing and other information to recommend content you may like. You can opt out: Taboola: <https://www.taboola.com/policies/privacy-policy#userchoicesand-opting-out>

(d) **Cookies**

You can block or disable third-party cookies in your browser settings so that your browser accepts only first party cookies, which are those cookies belonging to the site you are currently browsing, including cookies from HomeEquity when you're on the Sites.

9. **What if you have a privacy concern?**

***You may contact our Privacy Officer with any questions or concerns you may have about our handling of your personal information.***

If you have any questions, concerns or complaints about the information in this Privacy Notice or our privacy practices, let us know right away. You can contact us at:

Chief Privacy Officer  
HomeEquity Bank  
Royal Bank Plaza, South Tower  
200 Bay Street, Suite 3500  
Toronto, ON, M5J 2J1

Tel: 1-866-313-2447

E-mail: [privacyofficer@heb.ca](mailto:privacyofficer@heb.ca)