# Your privacy. Our priority.

Personal information: Collection, Use, and Disclosure Statement ("Privacy Statement")

## Our Privacy Commitment

ATB Financial<sup>1</sup> is committed to protecting your privacy and the confidentiality of your personal information.<sup>2</sup> Our commitment to protecting your privacy is set out in our Privacy Code, which can be retrieved from atb.com, or from an ATB Financial branch. This Privacy Statement is designed to comply with applicable privacy legislation including Alberta's Personal Information Protection Act ("PIPA").

#### We want you to know

- Why we collect your personal information;
- How we use and protect your personal information;
- The circumstances in which your personal information may be disclosed; and
- How you may request access to your own personalinformation.

ATB Financial is committed to protecting the personal information of our customers and has prepared this Privacy Statement to better serve you.

#### What is "Personal Information"?

Personal information is any information that identifies you as an individual. It does not include business contact information used for business purposes. Personal information that we collect, use, and disclose to and from you or other sources may include but is not limited to your name, address, date of birth, gender, other unique identifiers and credit history.

## Your acknowledgement

Your request for or use of ATB Financial products and services is your acknowledgment of the following:

## Collecting Your Personal Information

- 1. ATB Financial will treat your personal information in accordance with applicable privacy legislation and any written agreement between you and ATB Financial.
- 2. All personal information that you have provided to ATB Financial is true, accurate, and complete. This applies to all personal information that you give in the future in connection with any application or agreement for products and services.
- 3. You agree to help keep the personal information held by ATB Financial up-to-date through prompt notification of changes to your telephone number, address, email, or other personal information.
- 4. You consent to ATB Financial, from time to time, collecting personal information about you. You acknowledge receipt of notice that ATB Financial may collect your personal information from you as well as from any third party, including any credit reporting agency, institution, other credit grantor, and your current or former employer or any other person, corporation, organization, society, or other entity from time to time. Where applicable, ATB Financial may also collect your motor vehicle information from Alberta Registries (or any other provincial government department having jurisdiction in that area).

### Using and Disclosing Your Personal Information

- 5. ATB Financial may use or disclose your personal information as follows:
- (a) Toverify your identity;

1 ATB Financial, its agents, and its wholly owned subsidiaries, including ATB Securities Inc., ATB Investment Management Inc., ATB Insurance Advisors Inc., are hereinafter collectively referred to for the purposes of this Privacy Statement as "ATB Financial." 2 For the purposes of this Privacy Statement, "you" and "your" refers to an individual obtaining products and services from ATB Financial, and "us", "we", and "our" refer to ATB Financial."



- (b) To share it with credit reporting agencies, mortgage insurers, and other financial institutions to obtain credit bureau reports on you or to otherwise verify your credit worthiness;
- (c) To such parties as ATB Financial is required or permitted to do so by law;
- (d) To assess your initial and ongoing eligibility for credit and ATB Financial products and services;
- (e) For any purpose related to the provision of services you request from ATB Financial. ATB Financial may also give it to any third party contracted with or for ATB Financial, but only as needed for the provision of those services and provided they comply with PIPA or applicable privacy legislation;
- (f) To comply with legal and regulatory requirements. This may include but is not limited to income tax reporting (which includes your social insurance number where you hold a product that generates income (such as a savings or investment account), investigations pursuant to legislation or law enforcement, or disclosure to government agencies, regulatory authorities,³ public bodies, other entities, or self regulatory bodies.⁴The regulatory authorities may use and disclose your personal information for investigation and enforcement purposes;
- (g) To transfer your personal information to a third party pursuant to an assignment or sale that is permitted by any agreement between you and ATB Financial:
- (h) To confirm ownership or description of any collateral;
- (i) To service, monitor, or maintain your account, product, and services;
- (j) Tounderstand your needs and to offer other products and services to meet those needs;
- (k) To report any account irregularities to any credit reporting agency or other institutions as required or permitted by law;
- (I) Touse your social insurance number to help identify you with credit reporting agencies and other financial institutions to ensure the accuracy of information collected and reported for credit data-matching purposes; and
- (m) To provide you with notices that serve the interests of customers of ATB Financial.

### Out of Canada Service Provider Policy

6. ATB Financial may share your personal information with third parties or agents within or outside the Province of Alberta or Canada with whom we contract for the purposes of managing your relationship with us, and the products or services you request. Such personal information in the custody and control of a third party or agent in another province or country is subject to the laws of that jurisdiction. Your personal information may be collected, used, or disclosed by such third parties or agents without your knowledge or consent where required or permitted by law. You can access ATB's Out of Canada Service Providers Statement online at <a href="https://www.atb.com">www.atb.com</a> (under heading *Privacy and Security*) for details of where we may store your personal information outside of Canada. If you have questions about the collection, use or disclosure of your personal information outside of Canada, you may contact ATB's Chief Privacy Officer by email at PrivacyOfficer@atb.com.

#### Marketing

- 7. ATB Financial may also use or disclose your personal information for marketing purposes including:
- (a) To assess your initial and ongoing eligibility for other products and services of ATB Financial;
- (b) Topromote ATB Financial or third-party products and services;
- (c) To give it to third parties so they can promote products and services of ATB Financial or the third parties; and
- (d) To give to third parties contracted with or for ATB Financial so they can promote additional products and services to you.
- 8. Where your relationship with us is governed by securities law or regulatory requirements, your express consent (meaning your written or verbal consent) may be required for marketing purposes identified in section 7. Where applicable, ATB Financial will obtain your express consent.

3 Regulatory authorities include but are not limited to the Alberta Securities Commission and the Alberta Insurance Council. 4 Self-regulatory bodies include but are not limited to the Mutual Fund Dealers Association and the Investment Dealers Association.



## Withdrawing Consent

- 9. You may request that ATB Financial not use your personal information for marketing purposes at any time as long as:
- (a) There are no legal requirements for ATB Financial to use your personal information;
- (b) Withdrawing your consent does not result in our inability to fulfill any agreement you have with us; and
- (c) You give ATB Financial notice by:
  - i) Calling the Customer Care Centre at 1-800-332-8383; or
  - ii) Visiting any ATB Financial branch.

#### Online Advertising

- 10. We may use third party cookies to serve ATB Financial advertisements on other websites. In serving our ads, third party companies may use cookies and commonly used technology to collect certain information about your visits (such as browser type, IP address, which page was visited, and time of day). No personal information is collected for our online advertising. Any information collected is used to tailor promotions or special offers to you based on your interests.
- 11. We use Google AdWords and analytics remarketing to advertise ATB Financial across the Internet. AdWords remarketing will display relevant ads tailored to you based on what parts of our website you have viewed by placing a cookie on your machine. This allows us to tailor our marketing to better suit your needs and only display ads that are relevant to you.

## How to Opt Out of Online Advertising

12. Please refer to the Help instructions in your browser to learn more about cookies and how to manage their use. You may elect to refuse cookies. If you do not wish to participate in our Google AdWords remarketing, you can opt out by visiting <a href="Google's Ads">Google's Ads</a>
<a href="Preferences Manager">Preferences Manager</a>. You may also opt out of personalized marketing on third party websites by visiting <a href="www.networkadvertising.org/choices/">www.networkadvertising.org/choices/</a>.

#### Retention of Personal Information

13. If you are no longer a customer of ATB Financial, ATB Financial may keep your personal information in its records for as long as it is required for the described purposes and to meet any and all legal, legislative, and regulatory requirements.

#### **Amendment**

ATB Financial will review this Privacy Statement and our Privacy Code regularly to ensure that they continue to meet our obligations to you. ATB Financial reserves the right from time to time to modify the Privacy Statement and Privacy Code. ATB Financial will inform you of any changes as required by law. You may obtain the most current version of these documents at any time by visiting atb.com.

## Complaints

ATB Financial has a complaint resolution process if you are concerned about the collection, use, and disclosure of your personal information. Please contact an ATB Financial branch directly or call our Customer Care Centre at 1-800-332-8383 for more information.

## Accessing Your Personal Information

You may consult our Privacy Code for assistance on how to request access to your own personal information, or you may write ATB Financial's Privacy Officer.



## Keeping Your Personal Information Accurate

We are committed to maintaining the accuracy of your personal information. To keep your personal information current and complete, we encourage you to notify us of any changes, including to your name, address, telephone, or email information. If upon review of your personal information you discover any inaccuracies, please contact our Customer Care Centre at 1-800-332-8383 or visit any ATB Financial location.

You may contact ATB Financial regarding privacy matters:

ATB Financial Privacy Officer #2100, 10020 – 100 Street Edmonton, Alberta T5J 0N3

Email: PrivacyOfficer@atb.com

Or by calling our Customer Care Centre: 1-800-332-8383

