

YOUR PRIVACY. OUR PRIORITY.

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

Our privacy commitment

ATB Financial¹ is committed to protecting your privacy and the confidentiality of your personal information.² Our commitment to protecting your privacy is set out in our *Privacy Code*, which can be retrieved from atb.com. 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 personal information.

ATB Financial is committed to protecting the personal information of our clients 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 may include but is not limited to your name, home address or telephone number, email, date of birth, gender, personal references, employment records, unique identification numbers (including social insurance number, driver's license, birth certificate, passport), biometrics, and personal financial records, including your credit history. Biometrics means information derived from an individual's personal characteristics (such as retina or iris scan, fingerprint, voiceprint, and scan of hand or face geometry).

Your Acknowledgement

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

1. **Collecting your personal information**
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.

¹ ATB Financial, its agents, and its wholly owned subsidiaries, including ATB Securities Inc., ATB Investment Management Inc., ATB Insurance Advisors Inc, and BCV Asset Management 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.



4. You consent to ATB Financial collecting personal information about you to provide you with our products and services. You acknowledge receipt of notice that ATB Financial may collect your personal information from you as well as from a third party, including any credit-reporting agency, insurance company, other financial institution, and your current or former employer or any other person, corporation, organization, or other entity from time to time where required or permitted by law. 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).

5. Using and disclosing your personal information

ATB Financial may use or disclose your personal Information as follows:

- a. To verify your identity or to authenticate you when you contact us or visit an ATB branch or agency;
- b. To assess your financial behaviour, payment history, and initial and ongoing eligibility for credit and ATB Financial products and services you request or use;
- c. To share with your joint account holders, authorized representatives, executors and beneficiaries;
- d. To detect and prevent fraud, cyber threats, and prevent or suppress financial abuse;
- e. For any purpose related to the provision of services you request or obtain 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 legislation;
- f. To comply with legal and regulatory requirements including anti-money laundering, income tax reporting (which includes your social insurance number where you hold a product that generates income), investigations pursuant to legislation or law enforcement, or disclosure to government agencies, regulatory authorities,³ public bodies, other entities including financial institutions, or self-regulatory bodies.⁴ The regulatory authorities may use and disclose your personal information for investigation and enforcement purposes;
- g. To confirm ownership or description of any collateral;
- h. To communicate product features, updates and other information about our products and services;
- i. To service, monitor, or maintain your account, product, and services;
- j. To understand your needs and to offer other relevant products and services to meet those needs;
- k. For use in Artificial Intelligence (AI)/machine learning models that will generate insights and personalized recommendations about products and services that may be of interest to you;
- l. To enhance security and fraud mitigation, provide product, market, and client updates, or otherwise improve client service through the use of AI programs;
- m. To conduct training on in-house AI programs to better serve our clients;
- n. To conduct market research and obtain feedback to improve our products and services;
- o. To transfer your personal information to a third party pursuant to an assignment or sale of ATB Financial assets (note: ATB will NEVER sell your personal information to a third party);
- p. To manage and assess our risks and operations, in accordance with applicable privacy laws; and
- q. To provide important notices or relevant updates to ATB Financial clients.

6. Holding data outside of Canada

ATB Financial may contract with third parties or agents within or outside the Province of Alberta or Canada for the purposes of managing your relationship with us, and the products or services you request or use. Personal information in the custody and control of a third party or agent in another

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.



province or country is subject to the laws of that jurisdiction. As such, your personal information may be collected, used, or disclosed without your knowledge or consent where required or permitted by law. You may access our Out of Canada Service Providers Statement for details on where we may store your personal information outside of Canada at atb.com/company/privacy-and-security.

7. Marketing purposes

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; and
- b. To promote ATB Financial or third-party products and services.

8. Marketing consent requirements

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.

9. Retention and deletion of personal information

If you are no longer a client of ATB Financial, we may keep your personal information for as long as it is required for the described purposes and to meet any and all legal, legislative, and regulatory requirements. Once personal information is no longer required for any reasonable business purpose or legal requirement, it will be securely destroyed or rendered anonymous (de-identified).

10. Withdrawing consent

You may request that ATB Financial not use or disclose your personal information for marketing purposes at any time as long as:

- a. There are no legal requirements for ATB Financial to use or disclose 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 ATB Client Care at 1-800-332-8383; or
 - ii. Contacting or visiting an ATB Financial branch directly.

In addition to withdrawing your consent for standard marketing under PIPA, you may also revoke your consent for ATB Financial to send you electronic marketing or promotional material per *Canada's Anti-Spam Legislation (CASL)*. To unsubscribe under CASL, please visit the [ATB Financial CASL page](#), call Client Care, or visit an ATB branch for assistance.

11. Amendment

ATB Financial will review this *Privacy Statement* regularly or as needed 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 material 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 escalation process if you are concerned about the collection, use, and disclosure of your personal information. Please contact ATB Client Care or you may email ATB Privacy Officer:

PrivacyOfficer@atb.com



Accessing your personal information held by ATB Financial

PIPA allows you to request access to your personal information held by ATB Financial. Depending on the scope and complexity of your request, ATB Financial may charge a reasonable fee to process an access request. If there's a cost associated with your request, you will be provided with a written fee estimate in advance.

Certain privacy legislation, including the [Alberta Personal Information Protection Act](#) ("PIPA"), outlines that we may not be able to provide you with some of the personal information requested. Such situations include but are not limited to cases in which the information:

- mentions other persons or includes third party personal information;
- is subject to solicitor-client privilege;
- is no longer retained by ATB Financial or the records do not exist; and/or
- cannot be disclosed for legal, enforcement, or investigative reasons.

If we cannot give you access to such personal information, we will explain why.

Keeping your personal information accurate

We are committed to maintaining the accuracy of your personal information. To keep your personal information up to date, please notify ATB Financial promptly of any changes, including to your name, address, telephone, or email. If upon review of your personal information you discover any inaccuracies, please contact ATB Client Care at 1-800-332-8383.

You may contact ATB Financial regarding privacy matters by writing or calling:

ATB Financial's Privacy Officer
By phone: 1-800-332-8383 (Client Care)
By email: PrivacyOfficer@atb.com

ATB Place, 2100, 10020 - 100 Street (Transit #115)
Edmonton, Alberta T5J 0N3

