

## **COLLECTION AND TRANSFER OF PERSONAL INFORMATION TO SERVICE PROVIDERS OUTSIDE CANADA (“OUT OF CANADA SERVICE PROVIDERS STATEMENT”)**

### **Our Privacy Commitment**

ATB Financial<sup>1</sup> is committed to making sure that your personal information is protected.<sup>2</sup> You may find this commitment by ATB in our *Privacy Code*, which is available on our website at [www.atb.com](http://www.atb.com), or you may obtain a copy from any of our branches.

This *Out of Canada Service Providers Statement* (the “Statement”) sets out why we provide your personal information to out of Canada third party service providers, and the countries where the service providers are located.

### **What is Personal Information?**

Personal information is any information that identifies you as an individual (“Personal Information”). Examples of your Personal Information include your name, address, date of birth, gender, social insurance number, passport number, birth certificate, driver’s licence number, credit history, and your account information.

Personal Information includes Personal Employee Information. Personal Employee Information is information that may be required to set up, carry on, or bring to an end an employment relationship.

Personal Information excludes an individual’s business contact information such as name, position or title, business telephone number, business address, business e-mail address, business fax number and other business information used to contact an individual concerning the individual’s business.

### ***Collecting and Transferring your Personal Information to Service Providers outside Canada***

As part of our standard business operations, we ensure access to your Personal Information is restricted internally to ATB Financial. Our business requires that we sometimes contract with service providers outside Canada to carry out certain functions on our behalf such as data processing and back-up. In such situations, we enter into contracts with our service providers and they cannot disclose your Personal Information

---

<sup>1</sup> 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 Out of Canada Service Providers Statement as “ATB Financial”.

<sup>2</sup> For the purposes of this *Out of Country Service Providers Statement*, “you” and “your” refer to an individual obtaining products and/or services from ATB Financial, and “us”, “we”, and “our” refer to ATB Financial.

except where authorized to do so by law or by ATB Financial. Currently, we have entered into contracts with service providers outside Canada to provide the following services to ATB Financial:

S/N	Country	Purpose
1)	United States	ATB uses a service provider in the United States to process bill payments by customers and employees. The service provider backs up the processed data in the United States.
2)	United States	A service provider in the United States manages the relocation of ATB employees. The service provider collects, uses and retains Personal Employee Information in the United States for relocation purposes.
3)	United States, Australia and Ireland	A service provider in the United States provides payment processing services, including credit card payments for crowdfunding small business ventures. The credit card information may be processed and stored in the United States, Australia and Ireland.
4)	India	A service provider in India has access to some of our fund holder information. The service provider's access to Personal Information is for the purpose of processing fund holder information.
5)	United States	A service provider in the United States administers a website or platform that offers crowdfunding services. The service provider collects, uses and retains Personal Information in the United States.
6)	United States	ATB uses a service provider to process domestic and international wire transfers. The service provider or correspondent bank may use, transfer or retain Personal Information in the United States required to send and receive wire transfers.

7)	United States	ATB uses a service provider in the United States to process Foreign Exchange, Commodity or Interest Rate Swap trading and settlement.
8)	United States	ATB uses a service provider in the United States for managing ATB team member employment information.
9)	United States	ATB uses a service provider located in the United States to manage ATB team member learning activities.
10)	United States	ATB uses a service provider located in the United States to process time and attendance information for ATB team members.
11)	Germany	ATB uses a service provider located in Germany to process payroll related transactions for ATB team members. The service provider has a secondary data centre/ failover site located in the Netherlands in the event of an emergency situation or disaster recovery.
12)	United States	A service provider in the United States collects and uses customer information required to provide personal financial management services.
13)	United States	ATB uses service providers located in the United States to prepare loan documentation and administer loans including for purchase and refinance of US residential properties.
14)	United States	A service provider stores ATB Financial customers' personal identification document information (gathered online) in the United States for a short period as back-up to customer identity information stored in Canada.
15)	United States	ATB uses a service provider in the United States to order clothing and specialized apparel for team members.
16)	United States	A service provider collects client's personal information for the purpose of adding a payment card to a mobile wallet application.

17)	United Kingdom	ATB uses a service provider in the United Kingdom to process and provide online currency exchange and payment services
18)	United States	A service provider in the United States collects and uses customer information to help ATB better understand customer needs.
19)	Ireland	A service provider collects ATB customer information for research purposes and stores the information in the Ireland as back-up to similar information already stored in Canada.
20)	United States	ATB uses a service provider in the United States to support industry standard identity and access management that will allow a client to seamlessly move between applications with common credentials.
21)	United States	ATB uses a service provider in the United States to analyze and segment data and uses that information to communicate with clients.
22)	United States and United Kingdom	ATB uses a service provider in the United States to provide clients with access to certain airport lounges. The service is a perk of the product offered by us.
23)	United States	ATB uses a service provider in the United States to process and store electronic records and related electronic signatures which allow clients to go paperless.
24)	United States and South Korea	A service provider collects client's personal information for the purpose of adding a payment card to a mobile wallet application.
25)	United States	ATB uses a service provider to manage subscription lists for various publications and send targeted marketing campaigns or notification of account related information to our customers.
26)	United States	A service provider used to facilitate customer wealth management transactions stores backup customer information in the United States.
27)	United Kingdom, United States, Costa Rica	ATB uses service providers which stores data in different locations. The service providers captures

		information about ATB to complete an organizational study to determine industry best practices.
28)	United States	ATB uses a service provider in the United States to manage lists and send targeted marketing campaigns.
29)	United States, Chile, Belgium, Ireland, Finland, Netherlands, Denmark, Singapore, Taiwan, Germany, United Kingdom, India, Brazil, Australia, Japan	ATB uses service providers for computing infrastructure services that provide online services for ATB communication, collaboration, email, data analytics, data storage and document storage.
30)	United States	ATB uses a service provider in the United States that provides online chat and support for customers and team members.
31)	United States	ATB uses a service provider in the United States that use artificial intelligence applications to provide personal banking services to ATB customers and access, transmit and store personal information using third party messenger services.
32)	United States	ATB uses a service provider in the United States to assist with predictive modelling to determine client banking needs.
33)	United States	ATB uses service providers for computing infrastructure services that provide online services for ATB communication, email, data analytics, data storage and document storage.
34)	United States	ATB uses a service provider that store information in the United States. The service provider's tool is used by ATB to approve expenses submitted by expense cardholders; reconcile expense cardholders transactions, gather and generate reports relating to expenses submitted by team members within ATB.
35)	United States and Ireland	ATB uses a service provider that is a cloud-based video intelligence platform for discovering, hiring,

		and developing talent.
36)	United Kingdom	ATB uses a service provider which stores call center and enterprise telephony system information in the United Kingdom.
37)	Ireland	ATB uses a service provider which provides enterprise content management services who stores customer information in Ireland.
38)	United States	A service provider in the United States provides a CRM platform to manage ATB customer and account investment related details. The service provider allows the tracking, management and maintenance of current and historical customer and account information with a focus on improving customer service relationships.
39)	United States	ATB uses a service provider that stores customer information in the United States for Night Deposit and ABM processing
40)	United States, India, Bangladesh, and Romania.	ATB uses a service provider to screen customer information to ensure compliance with AML requirements.
41)	Ireland	ATB uses a service provider to aid in registration, notification, alerts, newsletters, new discussion invites, password reset
42)	Germany and Ireland	ATB uses a service provider that stores data in Germany and Ireland for some recruitment purposes and to receive and process some job applications.
43)	United States	ATB uses a service provider in the United States to create new web-based applications, solutions, tools and storage for client information at ATB.
44)	United States	ATB uses a service provider to manage some of the HR services including recruitment, onboarding, time management and payroll.
45)	Australia	ATB's Digital offering uses a service provider to aid in customer onboarding by performing identity verification and all data is processed in Australia.
46)	United States	ATB's Digital offering uses a service provider in the United States to validate users via SMS

		during onboarding and for fraud prevention.
47)	United States, Ireland	ATB's Digital offering uses service provider to maintain, manage, and track FAQ, Articles, and online chat support for customers. All data is securely stored in the United States.
48)	United States	ATB's Digital offering uses a service in the United States to provide fraud monitoring, detection, and prevention.
49)	United States	ATB's Digital offering uses a service provider to manage subscription, email notifications and targeted marketing campaigns. All data is stored in the United States.
50)	United States	ATB's Digital offering uses a service provider for core banking platform to manage, maintain, and track customer information, transaction, and account details. All data is securely stored in the United States.
51)	United States	ATB's Digital offering uses a third party service provider to verify customer identification. All data is securely stored in the United States.
52)	United States	ATB's Digital offering uses a third party service provider to verify customer identification. All data is securely stored in the United States.
53)	United States	ATB uses a service provider in the United States for secure data storage and restoration services for physical tapes.
54)	United States	ATB Financial uses a third party application to monitor customer transaction activity for fraud monitoring and compliance with regulatory requirements.
55)	United States	ATB uses a service provider with data stored in the United States for event management, logging, monitoring and alerting.
56)	United States	ATB uses a service provider to measure and understand team member engagement.
57)	United States	ATB uses a service provider in the United States for Data Loss Prevention (DLP) and internet access security.

58)	Ireland	ATB uses a service provider in Ireland that will process delivery reports containing Personal Information that can be used to determine sanctioned email services and identify misconfigurations to ensure email services are in full compliance.
59)	United States	ATB uses a service provider for analytic purposes including usage of various ATB applications and platforms to better understand which products our customers want.
60)	Ireland	ATB uses a service provider to manage emails that are flagged as phishing/spam and automated reporting.
61)	United States, Germany, Australia, UK, Japan, Singapore, Ireland, India	ATB uses a service provider for team member authentication to ensure secure access to its network and authorized devices.

We ensure that the above service providers meet our privacy standards before we enter into contracts with them. We also require them to secure and maintain confidentiality over your Personal Information. We only provide the personal information that is required to perform the services requested by us.

We have in place different security measures such as organizational, contractual, and technological measures to protect your Personal Information from loss, unauthorized access, or disclosure.

ATB Financial is committed to making sure that your Personal Information is kept confidential and has prepared this Statement to serve you better. Should you require more information about the collection or transfer of your Personal Information to service providers outside Canada, you may write ATB Financial's Privacy Officer at:

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

By e-mail: [PrivacyOfficer@atb.com](mailto:PrivacyOfficer@atb.com)

You may also contact ATB Financial's Customer Care Centre at: 1-800-332-8383.

Last updated: June 2022