

ATB Financial | Collection, use, and disclosure statement ("Privacy Statement")

Your privacy. Our priority.

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, 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 personal information.

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, home address, 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).

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

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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.
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, personal information agent, insurance company, other financial 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).

5. **Using and disclosing your personal information**

ATB Financial may use your personal information as follows:

- a. To verify your identity or for client authentication purposes;
- b. To assess your financial behaviour, payment history, and credit worthiness;
- c. To use it to give to, and obtain from, credit-reporting agencies, mortgage insurers, and other financial institutions, or where 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 you request or use;
- 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. 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), investigations pursuant to legislation or law enforcement, or disclosure to government agencies, regulatory authorities,³ public bodies, other entities, or self-regulatory bodies.⁴ The regulatory authorities may use and disclose your personal information for investigation and enforcement purposes;

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.

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- 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 service;
 - j. To understand your needs and to offer other products and services to meet those needs;
 - k. To conduct market research and obtain feedback on existing products and services you hold;
 - l. To report any account irregularities to any credit reporting agency; and
 - m. To provide you with notices that serve the interests of customers of ATB Financial.
6. ATB Financial may occasionally 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. 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. As such, your personal information may be collected, used, or disclosed without your knowledge or consent where required or permitted by law.
7. **Marketing purposes**
ATB Financial may also use your personal information for marketing purposes including:
 - a. To assess your initial and ongoing eligibility for other products and services of ATB Financial;
 - b. To promote ATB Financial or third-party products and services; and
 - c. To use 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.
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.
9. Retention of personal information
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.

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10. Withdrawing consent

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

11. 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 ATB Client Care or an ATB Financial branch for more information.

Accessing your personal information held by ATB Financial

To confirm or update your personal information, please call ATB Client Care, visit any ATB Financial branch or you may write ATB Financial's Privacy Officer. ATB Financial may charge a reasonable fee to process an access request. If a fee is to be charged, 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; 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.

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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 ATB Client Care at 1-800-332-8383 or write to us below.

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

ATB Financial's Privacy Officer

ATB Place, 2100, 10020 - 100 Street
Edmonton, Alberta T5J 0N3

Ph: 1-800-332-8383 (Client Care)

Email: PrivacyOfficer@atb.com