

HomeEquity Bank Privacy Principles in Brief

Your Privacy Matters to Us

At HomeEquity Bank, we're committed to protecting your privacy and any information you entrust to us. Personal information includes your name, address, date of birth and other personally identifiable information. We only ask you for personal information that is needed for the immediate purpose at hand, with your consent. For example we may need to collect information from you to process your application and determine if a product is suitable for you. HomeEquity Bank may be required by law to collect personal information, such as to verify your identity. We do not sell or rent lists of personal information, but we may need to disclose your information to third parties such as a lawyer, or obtain it from third parties such as a credit bureau, with your consent.

The word "information" means personal information about you or your property that you or your representatives provide to us, or that we collect from sources such as your financial institution, property appraisers, insurers or credit reporting agencies.

We abide by the Ten Fair Information Principles as outlined under Canada's federal privacy legislation, the *Personal Information Protection and Electronic Documents Act* (PIPEDA), which establishes rules for handling personal information. HomeEquity Bank's privacy policies reflect these principles as follows:

- 1. Accountability: HomeEquity Bank takes full responsibility for information under our control and has designated a Chief Privacy Officer who oversees our privacy program.
- 2. **Identifying Purposes:** The purposes for which your information is collected are identified by HomeEquity Bank at or before the time it is collected.
- 3. **Consent:** Informed consent is sought by HomeEquity Bank before collecting, using or disclosing information, except when inappropriate or prohibited by law. You may withdraw your consent at any time, subject to legal or contractual restrictions.
- 4. **Limiting Collection:** HomeEquity Bank limits the information collected to what we need for the purposes we identify.
- 5. Limiting Use, Disclosure, and Retention: Your information is never used or disclosed by HomeEquity Bank for purposes other than those for which it was collected, except with your consent or as required by law. Information is only retained as long as necessary for fulfillment of those purposes. We may transfer your Personal Information to third party service providers who assist us in serving you, such as vendors, suppliers and agents; however, we require them to protect your information in a manner consistent with our privacy standards. Our service providers may be located outside of Canada and may be required to disclose personal information under the laws of their jurisdiction.

- 6. Accuracy: HomeEquity Bank makes every reasonable effort to keep your information as accurate, complete and up-to- date as is necessary for the purposes for which it is to be used.
- 7. **Safeguards:** HomeEquity Bank protects your information with safeguards that are appropriate to the sensitivity of the information. This includes physical, organizational and technical security measures.
- 8. **Openness:** HomeEquity Bank makes readily available specific information about our policies and practices relating to the management of information.
- 9. Individual Access: You have the right to access the information that we have about you in our files. If you identify information that is not correct, we will make the necessary changes. To request access to your information held by HomeEquity Bank, you can do so by filling out this form. You can also contact our Privacy Officer by:
 Toll-free Telephone: 1-866-698-2447
 Email: privacyofficer@heb.ca
 Or writing to us at:
 Privacy Officer HomeEquity Bank
 Royal Bank Plaza, South Tower,
 200 Bay Street, Suite 3500,
 Toronto, ON M5J 2J1
- 10. **Privacy Concerns:** If you were to ever have any concerns about HomeEquity Bank's privacy policy you can contact us by using our Complaint Handling Procedure which can be found on all of our websites. We will investigate and respond to your concerns about any aspect of our handling of your information.