Privacy

Agreement

This document provides you with information about how we protect your privacy, why we ask for certain information, and what we do with it.

Please take the time to read about the agreements, consider the content, learn what you can expect from us and understand your responsibilities as a member of Assiniboine Credit Union.

Should you have any questions, please do not hesitate to contact us.

Assiniboine™ CREDIT UNION

REVISED SEPTEMBER 2012

Protecting Your Privacy

Protecting the personal information we collect and maintain is as important to us as it is to you. Like any organization, we require a certain amount of personal information to conduct business and provide you with the products and services you want and need. At the same time, you have a right to know that your privacy is being respected and that your personal information is collected, used and protected appropriately. For that reason, we have policies and practices in place to safeguard and maintain the accuracy and security of your personal information (in this Privacy Agreement, when we use the term "personal information", we mean information about an identifiable individual).

Our Privacy Agreement

Our Privacy Agreement is a key part of our commitment to treat you fairly, provide you with superior member service, and maintain the accuracy and security of your personal information. The Agreement is guided by the following ten principles:

Principle 1. Accountability

We are responsible for maintaining and protecting all member personal information under our control and have designated a Privacy Officer who is accountable for our compliance with the ten principles that comprise this Privacy Agreement.

Principle 2. Identifying Purposes

When we ask for your personal information, we identify what it will be used for.

Principle 3. Consent

We require your knowledge and consent for the collection, use or disclosure of your personal information, except where it is required or permitted by law.

Principle 4. Limiting Collection

We collect personal information by fair and lawful means and limit our collection to those details necessary for identified purposes.

Principle 5. Limiting Use, Disclosure and Retention

We use or disclose your personal information only for the purpose for which it was collected, unless you consent otherwise, or when it is required or permitted by law. We retain personal information only for the time required to fulfill the purpose for which it was collected.

Principle 6. Accuracy

We maintain and update your personal information as accurately and completely as necessary to fulfill the purposes for which it is used.

Principle 7. Safeguarding Member Information

We protect your personal information with security safeguards appropriate to the sensitivity level of the personal information.

Principle 8. Openness

We make information available to you concerning the policies and practices that apply to the management of your personal information.

Principle 9. Member Access

At your request, and subject to applicable law, you will be informed of the existence, use and disclosure of your personal information, and be given access to it. You may verify the accuracy and completeness of your personal information provided, and may request that it be amended.

Principle 10. Handling member complaints and suggestions

Our Privacy Officer will answer any questions or enquiries you have about this Privacy Agreement or our privacy practices.

Safeguarding Your Personal Information

We have comprehensive security safeguards and standards in place to protect our systems and your personal information against unauthorized access and use.

All ACU employees are familiar with procedures that safeguard member personal information. The protection of your personal information is specified in our employment agreements and regularly confirmed in writing.

We audit our procedures and security measures regularly to ensure that they are properly administered and remain effective and appropriate.

We retain your personal information only as long as it is required for the reasons it was collected, or as is required by law. Depending on the product or service and the nature of the personal information, this period may extend beyond your relationship with us but only as long as it is legally necessary.

When your personal information is no longer needed, we have procedures in place to securely destroy, delete, erase or convert it to an anonymous form.

Our systems ensure your Personal Identification Number (PIN), password and other access codes are kept private and confidential. For example, when you use your PIN at an automated teller machine, the code is scrambled after you enter it. In addition, only you know your access codes. Our employees can't find out what they are and will not ask you to reveal them.

When you enroll in online services such as CU@HOME Internet banking, the passwords you use are encrypted to ensure data security.

As part of their contracts with us, our suppliers and agents have confidentiality agreements in place and may not use your personal information for unauthorized purposes.

We ensure all legal enquiries or orders are valid and disclose only the personal information required or permitted by law to be disclosed.

What We Collect and Why We Need It

You look to us to offer responsible, reliable financial services and value-added advice. Collecting current, accurate personal information allows us to provide you with the best possible financial advice, as well as products and services you may find valuable.

To this end, ACU, our affiliates and partners in the Canadian Credit Union system collect, use or disclose your personal information for the following purposes:

- To verify your identity
- To provide you with the products and services you request
- To determine what products or services may benefit you
- To develop, offer, manage and provide products and services that meet your needs
- To determine your eligibility for products and services
- To detect and prevent fraud, and to help safeguard your and our financial interests
- To meet those purposes we may indicate on our website
- To carry out any other purpose that you authorize or that is required or permitted by law.

The information we request depends on the product or service you want. Much of the personal information we ask for is either mandatory by law or vital for us to be able to do business with you. Here are a few examples where you must provide us with specific personal information in order to obtain the product or service you want.

Social Insurance Number (SIN)

In order to comply with the Canada Revenue Agency's income reporting requirements, we must collect your SIN when you open a savings account or apply for an RRSP or other product that earns investment income.

Financial Information

Your financial information is also necessary to assess your eligibility for credit products you request, such as a line of credit, loan or mortgage. At the same time, it helps us give you the most appropriate financial planning advice about investments and other products and services.

Health Information

Information about your health may be required to determine your eligibility for some of the insurance products you request.

Date of Birth

Knowing your birth date helps us identify you and reduces the risk if someone is trying to impersonate you.

Transfer of Personal Information to Service Providers Outside Canada

We may engage service providers to assist us in fulfilling the purposes that are set out on this page, and, in some instances, these service providers may be located outside Canada. We only select service providers that protect personal information in a manner that is comparable to the protection we provide under our own privacy policies. Please be advised that personal information may be subject to, and accessed under, the laws of the countries in which our service providers operate. If you have any questions about our transfer of personal information to our service providers outside Canada, or if you would like to learn more about our privacy policies in that regard, please contact our Privacy Officer.

Why We May Ask Others for Personal Information About You

We obtain most personal information about you directly from you. However, with your consent, we may ask for personal information about you from a third party. For example, if you are applying for a loan or other credit, we may contact other lenders or credit bureaus for personal information about your credit history and we may also contact your employer or other sources to verify personal information you provide to us.

When We Share Personal Information

We are not in the business of selling member lists or personal information about you to others but, under certain circumstances, we may release your personal information to outside parties:

To Provide You with Service

We give the minimum amount of personal information necessary for our suppliers and agents to produce goods and services provided to you through us. For example, we must provide a cheque production company with the personal information you want printed on your ACU cheques. As well, at times we exchange member personal information with our Credit Union System affiliates regarding products and services offered countrywide. Examples include Credit Union Electronic Transaction Services (CUETS) regarding MasterCard, Credit Union Member Insurance Services (CUMIS) regarding insurance products and Credential Group regarding mutual funds. Also, as part of our commitment to continuous improvement, we sometimes employ the services of professional research companies to conduct independent member satisfaction surveys. If you do not want to participate in these surveys, please contact our Privacy Officer. In addition, we regularly refer ACU members to Assiniboine Financial Group, our affiliated wealth management division.

For Credit Granting Purposes

Just as we may request personal information from a third party when you apply to ACU for credit, with your consent, we may disclose your ACU credit history to other lenders or credit bureaus if you apply for credit at another financial institution. In these cases, we release only the information required to identify you and credit records about your repayment history.

When Required or Permitted by Law

We are obligated to provide personal information in response to a valid demand, search warrant or other legal enquiry or order. We may also disclose personal information to help us collect a debt owed to us and in the case of a breach of agreement or contravention of law.

What We Will Do if Your Information is Compromised

We are proud of the policies and practices we use to protect your personal information. We also believe that you have the right to know how your personal information is being collected, used and disclosed. That is why we have developed procedures to restore the integrity of your personal information if the policies and practices we use to safeguard your personal information are breached.

It is also why our procedures to respond to security breaches include breach notification. While we are not required by law to notify you of security breaches, we think you have the right to know what may have happened to your personal information, and what it might mean to you.

First, we will consider the sensitivity of the personal information that is involved and the probability that the personal information has been, is being or will be misused. If the breach creates a real risk of significant harm to you, such as the potential for financial loss, identity theft or negative effects on your credit, we will notify you of the breach as soon as we can. We will ensure that you have enough information to take whatever steps are possible to reduce the risk of the harm that could result from the breach.

Second, if there has been a material breach of the security of your personal information (determined by a number of factors, including the sensitivity of the personal information and the number of individuals whose personal information was involved), we will also notify the Office of the Privacy Commissioner of Canada (OPC). As an advocate for the privacy rights of Canadians, the OPC will help us respond to the breach and protect your privacy.

Third, we will investigate whether any other government institutions may be able to help us reduce the risk of harm from the breach. If so, we may notify those institutions, so that they can help us respond to the breach.

In all cases, we will strive to make our notifications as soon as we confirm the breach has occurred, and that notification is required.

The Choice is Yours

As an Assiniboine Credit Union member, you must provide required information for a product or service you request. However, you can opt out of receiving promotional information sent to you by us and/or our Credit Union system affiliates (excluding promotional material sent with your statements). If you wish to opt out of receiving promotional materials, or to learn more about our policies, contact our Privacy Office by:

mail:
Privacy Office
Assiniboine Credit Union
6th Flr, 200 Main Street
Box 2, Station Main
Winnipeg, MB R3C 2G1

email:
PrivacyOfficer@assiniboine.mb.ca
Note: For your protection, do not send sensitive financial or personal information by email.

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