



# Privacy Policy

December 2019

The bottom half of the page is decorated with large, overlapping geometric shapes in shades of yellow, green, and blue. A vertical line of diagonal hatching is visible on the right side of the page.

## AT CAMBRIAN, YOUR PRIVACY IS OUR POLICY

At Cambrian Credit Union, we know our members are concerned about the confidentiality and security of their personal information. This Policy ensures our employees comply with our policies, procedures, practices and security measures, and helps inform you of your rights and responsibilities. We're committed to protecting your personal information and privacy while still providing the reliable financial services you know and trust.

Regardless of how you deal with us – on the phone, online, or in person – we have strict security measures and procedures in place. These measures and procedures help us protect your transactions and personal information from disclosure, misuse, alteration and unauthorized access.

In order to ensure the continued security and responsible collection of your personal information, we've appointed a Privacy Officer to be accountable for this security and collection. Protecting your information and your privacy is our priority, and we've established policies and procedures around this protection.

Our staff know and understand the importance of these policies and procedures, and follow them carefully.

### WE WILL ALWAYS:

- Use your information legally and fairly
- Respect your wishes in terms of your privacy
- Maintain an open dialogue about our usage and protection of your personal and financial information

### WE WILL NEVER:

- Gather, use or share your personal information without your consent, except where required by law
- Sell, trade or rent your personal and/or financial information to third parties

## HOW CAMBRIAN USES YOUR PERSONAL INFORMATION

Be assured Cambrian will only gather the information essential to the product or service you've requested from us. We only collect your personal information fairly and legally, and you'll be fully informed. We'll only use the gathered information for its dedicated purpose, and no other.

Cambrian doesn't rent, trade or sell your information to third parties.

To learn how Cambrian uses the information we gather from you, please see below:

### NAME, CONTACT INFORMATION, OCCUPATION

We require this information to establish your identity and to communicate all future account information and available services. This information is frequently queried and updated to meet the minimum industry and regulatory requirements necessary for all members.

### AGE, GENDER, DATE OF BIRTH

This information helps us confirm your identity, detect and prevent error, identity theft, and fraud, and helps safeguard your financial interest. We may also use this information to ascertain the suitability of, or your eligibility for, certain products or services we offer.

### IDENTIFICATION NUMBERS, SOCIAL INSURANCE NUMBER (SIN)

If there are tax consequences to your transactions, we're legally require to acquire your social insurance number. We'll also use your SIN to conduct personal investigations, such as credit bureaus, and in conducting identity verifications as required.

### PERSONAL FINANCIAL RECORDS

We may examine your financial information to identify appropriate products and services, or to determine your eligibility if applying for new credit or account services.

### INTERNAL AUDIT

Your personal information may be accessed during an internal audit. These audits help us protect you from illegal or fraudulent activity.

### MEETING YOUR NEEDS

To best serve your future needs, we'll often reexamine the products and services you have with us in an effort to promote other services that may be of value to you. You can opt to stop receiving promotional offers at any time. We may also aggregate this information to help us forecast future business needs.

### LEGAL, SECURITY, REGULATORY REQUIREMENTS

If required by law, or for security or regulatory reasons, we may disclose your information to a third party, like our insurance provider if a claim is made. We'll disclose only the specific information required, and nothing more.

# OUR TEN PRIVACY PRINCIPLES

## 1. ACCOUNTABILITY

We're responsible for protecting personal information that is in our control or is transferred to third parties your consent. Our Privacy Officer is accountable for ensuring our compliance with the principles described in this Policy.

## 2. IDENTIFYING PURPOSES

The purpose(s) for which personal information is being collected will be identified, explained, and documented at the time of collection.

## 3. CONSENT

We'll obtain your consent before we collect, use or disclose your personal information. Informed consent (express or implied) is required for the collection, use or disclosure of personal information (except where permitted or mandated by law).

## 4. LIMITED COLLECTION

We'll only collect personal information required for the specific purposes we've explained to you.

## 5. LIMITING USE, DISCLOSURE & RETENTION

We'll use and disclose personal information only for the purposes we've identified to you, or when it's required or permitted by law. We retain personal information only for as long as is necessary.

## 6. ACCURACY

We keep personal information accurate, complete and up-to-date as is reasonably possible.

## 7. SAFEGUARDS

We safeguard your personal information with appropriate protective and security measures.

## 8. OPENNESS

After receiving a written request, we'll provide specific, easily understandable information on our personal information management policies and procedures within a reasonable timeframe.

## 9. ACCESS

You have the right to review any and all personal information we have about you, except where Cambrian Credit Union is required or permitted by law to deny access for a specific reason. We encourage you to verify the accuracy of the information we have and inform us of any corrections that need to be made.

## 10. CHALLENGING OUR COMPLIANCE

If you have any concerns, you may request that our Privacy Officer investigate the matter.

## WORKING WITH YOU TO PROTECT YOUR PRIVACY

At Cambrian, we want to ensure our members know what we do – and what they can do – to keep their personal and financial information safe and private.

This is a responsibility we take seriously. It's also a responsibility that requires us to work together with you, as we do in every other way for your banking needs. We need your help to make sure that the privacy and security protection we have in place is effective, day in and day out.

### WE PROTECT YOUR PERSONAL ACCESS INFORMATION

As a Cambrian member, you have access to certain systems in order to conveniently conduct your financial transactions, be it in branch, at an ATM, online or over the telephone.

Your Personal Identification Number (PIN) and any passwords aren't known to Cambrian. It's up to you to protect this information and prevent misuse. It's important to safeguard the personal or banking information you choose to hold, be it account statements, PINs/passwords, or unused cheques.

### USE CAMBRIAN ONLINE BANKING SECURE MESSAGING TO PROTECT YOUR PERSONAL ACCOUNT INFORMATION

It's important you understand the risk of sending personal information via email. Most emails aren't secure or encrypted, and your information can easily be stolen. We recommend that you don't send personal, confidential information to us or anyone else by unencrypted email.

For your own safety, whenever you email Cambrian, always use Secure Messaging, available through Online Banking, which provides secure, encrypted transmissions of personal information.

### WE HAVE ENHANCED ONLINE SECURITY MEASURES TO PROTECT YOUR FINANCIAL INFORMATION

To protect you from online threats like phishing (attempting to acquire personal information by masquerading as a trustworthy entity), our Online Banking log-in process includes challenge questions and customizable images for additional security.

### WE WILL NEVER USE EMAIL TO COMMUNICATE YOUR FINANCIAL MATTERS

Rest assured, if a security concern or other important matter arises, we'll never inform you by email.

We'll also never request sensitive information from you by email. If you receive a communication of that type, please contact us immediately.

## MAKE USE OF CAMBRIAN'S EMAIL OR TEXT TRANSACTION NOTIFICATIONS

You can set up email or text notifications for different types of transactions or activities.

*You can be notified:*

- That your monthly statement is ready for viewing
- When a transaction is performed on the account of your choice.
- When a transaction is performed using a specific Member Debit Card at ATMs or Direct Payment.
- When a future dated or recurring bill payment that you set up for payment failed.
- When you have a term maturing.

With Cambrian's privacy safeguards, your own security practices and by working together, you can always be assured that you're safely signing onto Cambrian's site.

## YOUR PRIVACY, ONLINE

We'll never collect any specific personal information without your knowledge and consent while you're visiting our website. We may gather anonymous information like the pages visited, the time and date of a visit, IP addresses (the Internet address of a browser's computer), the browsers used, any online ads you may have clicked to get to our site, and the website you came from. By gathering this anonymous statistical data, we can better understand how you use our website (i.e. which pages our members visit most, what time of day is most popular), and therefore plan improvements to better meet your needs. This information can't in any way be used to personally identify you.

We use cookies on our websites. Cookies help us track which areas of the site are most popular and to gauge usage patterns. A cookie is a piece of data stored by a website within a browser, and then subsequently sent back to the same website by the browser. Cookies were designed to be a reliable mechanism for websites to remember things that a browser had done there in the past. Cookies don't keep any personal information, like your name, address or other contact information. Additionally, cookies are site-specific. In other words, a cookie created by Site A can't be read by Site B and vice versa.

As you browse Cambrian's website, advertising cookies will be placed on your computer so that we can understand what you are interested in. Our display advertising partners\* then enable us to present you with retargeting advertising on other sites based on your previous interaction with cambrian.mb.ca. The cookies our partners employ do not collect personal information such as your name, email address, postal address, or telephone number.

You can visit [www.networkadvertising.org/choices](http://www.networkadvertising.org/choices) to opt out of targeted advertising.

Depending what area of our website you visit, you may be asked to share information in order to improve your visit or answer a question you may have in regards to our products or services. These information requests are always optional.

For instance, we'll ask you for information when you:

- Take part in an online survey
- Subscribe to our newsletter
- Email us an inquiry
- Participate in an online promotion or contest

Typically, emails aren't secure or encrypted, and your information can easily be stolen. We recommend that you don't send personal, confidential information to us or anyone else by unencrypted email. For your own safety, whenever you email Cambrian, always use Secure Messaging, available through Online Banking, which provides secure, encrypted transmissions of personal information.

You may notice that our site contains links to external websites. We aren't responsible for the content or privacy policies of these other websites.

Use caution when you send personal information online. Any unprotected email communication, as with any other communication (i.e., cellular phones, lettermail), isn't confidential, and can possibly be lost, changed, stolen, or intercepted.

\*Cambrian display advertising partners include Ad Roll, Facebook and Google.

## ACCESSING YOUR PERSONAL INFORMATION

You can submit a written request at any time to find out what personal information of yours we have. Your written request must provide enough detail for us to establish your identity and verify your personal information.

We'll advise you, in detail, what personal information we have and will provide details of our collection methods, our usage and to whom we have disclosed it. We ask your understanding, as in some instances we'll be unable to provide you with information considered commercially proprietary, protected by solicitor-client privilege, restricted/permitted to be withheld by law, or could compromise the confidentiality of another's personal information (this includes a family member or a current or former spouse.) We'll endeavour to provide you with the information you've requested as soon as possible. If for some reason we're unable to meet your request, we'll give you a detailed explanation. If you're unsatisfied for any reason, please contact Cambrian's Privacy Officer, using the information at the end of this document.

## KEEPING YOUR INFORMATION UPDATED

Please contact your branch if your personal information has changed (i.e. – new address, phone number) or if you notice an error in the information we have on file. We'll update your file as soon as possible with the correct and complete information, and we'll notify you once we've made the required changes. We'll also ensure any third parties that have received your information from us are advised of the changes. We rely on you to provide us with updated information.

## WITHDRAWING YOUR CONSENT

If at any time you decide you don't want your information used as outlined in this document and want to withdraw your consent, please contact your branch. There may be legal issues or service implications as a consequence to withdrawing your consent. Our staff can explain the consequences of withdrawing consent and help with your decision.

## POLICY UPDATES

We reserve the right to modify or delete all or portions of this Privacy Policy. Any alterations to the Policy will be communicated to our membership.

Please see the bottom of the page for the date of the most recent changes.



## CONTACT CAMBRIAN'S PRIVACY OFFICER

In order to ensure the continued security and responsible collection of your personal information, we've appointed a Privacy Officer to be accountable for this security and collection. Our Privacy Officer will also answer any questions you may have about how Cambrian collects and uses your information.

Here's how to contact our Privacy Officer:

### **By Mail:**

Cambrian Credit Union  
Attn: Privacy Officer  
225 Broadway  
Winnipeg MB, R3C 5R4

### **By Phone:**

(204) 925-2600

### **By Fax:**

(204) 231-1306

### **By Email:**

[privacyofficer@cambrian.mb.ca](mailto:privacyofficer@cambrian.mb.ca)