

Peoples Group (PG): Customer Personal Information Protection Policy

Introduction

Peoples Trust Company, and its subsidiaries including Peoples Bank of Canada (collectively “Peoples Group”) is committed to protecting the privacy and security of customers’ personal information. This policy explains the types of personal information we collect, how it is used and disclosed, and the steps we take to ensure customer personal information is handled appropriately.

Our policies and practices have been designed to comply with Privacy Law.

Definitions

In this Policy:

“**Online Banking**” means the portions of the Website relating to online banking transactions or account access and/or the Mobile Application Software.

“**Peoples Group**”, “**We**”, “**we**”, “**Our**”, “**our**” and “**us**” means Peoples Trust Company and all of its subsidiaries and business operations, including Peoples Bank of Canada (Peoples Bank).

“**Personal Information**” means any information, recorded or unrecorded, which, either on its own or in combination with other information, could be used to identify, contact or locate a specific individual. Personal Information includes, but is not limited to, an individual’s name, residential address, age, income, date of birth, gender, ethnic origin, credit history, employment information, social insurance number (SIN), where applicable, payment records, credit card number, financial information, device geolocation (geographical location), unique identifiers such as user name, account number or password or any other identifying number assigned to the individual, and product or service preferences. The following types of information about individuals are not considered Personal Information:

- Business contact information (except in Quebec)
- Public telephone directory information, where the subscriber can refuse to be listed
- Professional and business directories available to the public
- Certain public registries and court records
- Certain other publicly available printed and electronic publications

“**PIPEDA**” means *Personal Information Protection and Electronic Documents Act*

“**Privacy Law(s)**” means PIPEDA and any applicable provincial personal information protection act

“**Website**” means the Peoples Group website, including the content, information and services provided on or through the website and by e-mail, including all on-line tools, applications, calculators and e-mail alerts

Privacy Principles

Our commitment to protecting Personal Information is governed by the following privacy principles:

1. Accountability

Peoples Group is responsible for all Personal Information in its possession or control, including any Personal Information that is provided to us by our agents or transferred to third parties for processing, storage or other purposes. We have a designated Privacy Officer who is accountable for ensuring compliance with the principles described in this policy.

2. Identifying Purposes

Peoples Group identifies and explains the purpose(s) for which your Personal Information is collected at the time of collection. We do this explicitly or by implication where the purpose of using such information is reasonably apparent to you by virtue of its nature or the context in which it is being collected.

3. Consent

Peoples Group obtains your consent prior to collecting, using or disclosing your Personal Information. The method of obtaining consent will be appropriate to the type of Personal Information being collected, used and disclosed.

Peoples Group will make reasonable efforts to ensure that you understand what Personal Information is being collected and how your Personal Information will be used and disclosed.

Peoples Group will obtain your express consent (verbal, written or electronic) when the Personal Information is sensitive or its collection, use or disclosure is outside of the reasonable expectations of you providing it, or that creates a meaningful risk of significant harm that is not otherwise mitigated.

Peoples Group will rely on implied consent to collect, use or disclose your Personal Information where one or more of the following apply:

- a customer relationship already exists;
- express consent has previously been given for the same or similar use of the Personal Information; and
- where the intended use of the information is reasonably obvious from the context in which it is obtained and you provide the information voluntarily.

In some limited circumstances, we will collect, use and disclose your Personal Information without your consent, including:

- when such collection, use or disclosure is permitted or required by law;
- when use of the Personal Information is for acting in an emergency that threatens an individual's life, health or personal security;
- when there is reason to suspect that you may be a victim of fraud or financial abuse and Peoples Group needs to disclose the Personal Information to a government institution or authorized representative for investigation and/or follow up;
- when Peoples Group needs to collect a debt from you;

- in connection with an investigation or proceeding by Peoples Group or a law enforcement agency; and
- when certain information is publicly available.

You can withdraw your consent to any collection, use or disclosure of your Personal Information at any time on reasonable written notice, subject to permitted or required exceptions under Privacy Laws (e.g. where withdrawal of consent would frustrate a legal obligation such as collecting on a loan). While Peoples Group will make reasonable attempts to provide alternative arrangements, in some situations, withdrawal of consent may also deprive you of a benefit or service. To change your consent to collection, use or disclosure of Personal Information about you, refer to the “How to Contact Us” section below.

4. Limiting Collection

Peoples Group will only collect Personal Information that is required to provide you with the products and services you request. We will collect Personal Information only by reasonable and lawful means and will explain to you the specific purpose for collection.

5. Limiting Use and Disclosure

Peoples Group uses and discloses your Personal Information only for the purposes for which it was collected unless permitted by Privacy Laws. We will not use Personal Information for any additional purpose unless we seek your express consent to do so. We do not sell or rent Personal Information to any organization or person for any reason.

6. Retention

Peoples Group retains your Personal Information only as long as it is required for our business relationship or as required by applicable laws. Subject to any requirements to retain information, Peoples Group will ensure that Personal Information that is no longer required will be destroyed, erased or made anonymous in a secure manner.

7. Accuracy

Peoples Group endeavours to keep your Personal Information up to date, accurate and relevant for its intended use for as long as it is required to fulfill the purpose for which it was collected. In order to achieve this, you can assist us by updating your Personal Information (e.g. change of address or telephone number) with us.

8. Safeguards

Peoples Group is committed to protecting the Personal Information in our possession or control from loss, theft, alteration and misuse.

Peoples Group uses a variety of security measures to protect your Personal Information including:

- physical security measures such as restricted access facilities and locked filing cabinets;
- shredding of documents containing Personal Information;
- electronic security measures for computerized Personal Information such as password protection, database encryption and personal identification numbers;
- organizational processes such as limiting access to your Personal Information to a selected group of individuals; and

- requiring third parties given access to your Personal Information to protect and secure your Personal Information

The safeguards employed by us to protect your Personal Information depend on the sensitivity, amount, distribution, format and storage of the Personal Information.

In addition to the steps we take to safeguard your Personal Information, we believe there are measures you should take to protect yourself as well.

We advise you to not share any personal or financial information with others unless you clearly understand the purpose of them requesting the information and that you have confirmed you are dealing with a legitimate contact. We also recommend that you not share any significant personal or financial information via email or voicemail.

Although technologies can make it easier for fraud to occur, we employ around the clock monitoring systems and controls to detect and prevent fraudulent activity. We also build fraud prevention measures into our due diligence processes and regularly update our fraud detection/prevention methods.

While we take precautions to protect your Personal Information from loss, theft, alteration, or misuse, no system or security measure is completely secure. Any transmission of your personal data is at your own risk and we expect that you will use appropriate measures to protect your Personal Information as well.

9. Openness

Peoples Group will make its policies and procedures about how we manage Personal Information readily available to you and in a form that is understandable in plain, simple language. Some information on privacy is available on our Website. You can also obtain a copy of our Personal Information Protection Policy from any of our office locations or by contacting us directly.

10. Individual Access

You can request access to your Personal Information kept by Peoples Group by making a request at any time. Customers who wish to contact us should refer to the "How to contact us" section below. You may request any of the following:

- what types of Personal Information we have on record or in our control, how it is used and to whom it may have been disclosed;
- reasonable access to your Personal Information so you can review and verify its accuracy and completeness and request changes to the information. Peoples Group reserves the right to decline to make a requested correction but will append a notation to the record of your requested alternative information; and
- updates to your Personal Information.

Subject to applicable exceptions under Privacy Laws, such as where:

- your request would divulge confidential competitive business information of Peoples Group;
- the information is not readily retrievable and the burden or cost of providing access is disproportionate to the nature of the request; and

- access could interfere with or prejudice an investigation or proceeding by Peoples Group or law enforcement agencies.

Your request must be made in writing and provide us with sufficient detail to enable us, with reasonable effort, to identify you and your Personal Information. We will inform you within thirty days what Personal Information we have, how we collected it, how we used it, and to whom it has been disclosed. If we need to extend the time, or we must refuse your request, we will tell you why, subject to any legal restrictions, and will notify you of the new deadline, reason for the extension and of your right to contact the federal or provincial privacy commissioner applicable in your jurisdiction.

Collection, Use and Disclosure of your Personal Information

1. What Personal Information do we collect

The type of Personal Information we collect will depend on the type of product or service that you have requested. We may collect financial and other Personal Information from you such as:

- information establishing your identity (for example, name, residential address, phone number, email address, date of birth, gender, SIN (for identification and/or tax reporting purposes) and if applicable, account numbers);
- employment information including information about your previous and current employers;
- income information;
- information related to transactions arising from your relationship with and through us, and from other financial institutions; and
- information about financial behaviour such as your payment history and credit worthiness.

2. How we obtain your Personal Information

Most of the information we collect about you is received from you directly. We may also collect information from third parties outside Peoples Group, including:

- other lenders and financial institutions holding your external account(s);
- credit bureaus, credit reporting agencies, and credit insurers;
- persons authorized to act on your behalf under a power of attorney or other legal authority;
- service providers, agents and other organizations with whom you or we conduct business; or
- government agencies and public registries.

The decision to provide us with your Personal Information always rests with you. We may however, be limited in our ability to provide you with certain products and services, if you decline to provide us with information essential to fulfill your request.

3. *How we use your Personal Information*

Peoples Group collects your Personal Information to manage our relationship with you and to consistently deliver high quality products and services. Examples of why we collect Personal Information include:

- to verify your identity;
- to evaluate and process your application for an account or credit;
- to obtain your credit report;
- to communicate with you about your loans, securities or deposits;
- to accept deposits;
- to process and keeping track of transactions and report back to you;
- to protect you and us against theft, fraud and error;
- to analyze information to determine that relevant services are offered to you;
- to provide you with products and services requested by you and that Peoples Group believes may be of interest to you and provide value to you;
- to inform you about new business initiatives including contacting you to obtain your views and to encourage you to express your views about them;
- to offer you the opportunity to participate in contests, giveaways or other promotions;
- to conduct research and generate statistics related to our business, products and services;
- for business purposes, such as data analysis, audits, developing new products, enhancing, improving or modifying our services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities;
- to help manage and assess our risks, operations and relationship with you;
- to comply with legal and governmental requirements; and
- to fulfill any other purpose for which you provide it or with your consent.

If we have your SIN, we may use it for tax reporting purposes if you hold a product generating income and share it with the Canada Revenue Agency. We may also use your SIN to ensure an accurate match between your Personal Information and your credit bureau information, or as an internal identification number to accurately identify customers having same or similar names;

4. *Who We Share Your Personal Information with*

With other Peoples Group Companies

To assist us with offering the best services to you, we may share your Personal Information with our other companies and respective affiliates.

With our Employees

In the course of performing their duties, authorized employees may have access to personal, confidential information. Employees may only access information strictly necessary to perform their duties.

All employees that are likely to have access to Personal Information must sign a Code of Ethics under which they commit to maintaining the confidentiality of such information.

With Third Party Product and Service Providers

With your consent we may disclose Personal Information to certain third-party product and service providers retained by us to assist in providing you with services or to perform certain specialized

services to assist us in our business. Third Party product and service providers can include: deposit taking agents, credit reporting agencies, marketing partners, debt collection agents, account statement providers and secured data storage. Before we release any Personal Information, we require third party providers to respect the confidentiality of Personal Information and all legal requirements under applicable Privacy Law, and to agree to contractual requirements that are consistent with our Personal Information Protection Policy.

In these cases, we only disclose the specific information required to perform the services. Each of our suppliers must undertake to use customer information solely for the purpose of carrying out the services it has been retained to provide and must agree to safeguard the information.

As Required by Law

In certain instances, we may be compelled to disclose Information in response to a legally valid demand, enquiry, proceeding or other order. We reserve the right to comply with any third party demand such as Requirements to Pay and Requests for Information which have been issued under federal or provincial legislation, or any court order we receive, in request of your accounts. You agree that we will not be liable to you in any way for complying with any such third party demands or court orders issued on or against your accounts or products. In these cases, we take steps to ensure the request is valid and we only disclose the specific information necessary to satisfy the enquiry or order.

Transfers of Business

As we continue to grow, we may expand or sell our businesses. The law permits us to disclose your Personal Information in such a business transaction. The receiving party must collect, use and disclose the information only for the purposes of our Privacy Policy and the relevant legislation providing your privacy. Such party will also be subject to the principles of our Privacy Policy and the relevant legislation protecting your privacy.

Additional Disclosures

- with your consent;
- to a person sharing a joint account with you in relation to the account;
- to help us collect a debt or enforce an obligation owed to us by you; and
- to credit reporting agencies and other lenders.

We will not disclose Personal Information for purposes other than those for which it was collected, except with your consent or as required or permitted by law.

5. *Collection, Use and Disclosure of Non-Personal Information*

Non-personal information is any information, other than Personal Information, that does not reveal your identity or directly relates to you as a person. Some examples of non-personal information we may collect from you are demographic information, such as occupation, language, interests, the first three digits of your postal code, unique device identifier, and transactional data. Non-personal information may also include Personal Information we have de-identified or aggregated to the point where it no longer identifies a particular individual. Information relating to business customers may also include your business name, address, phone number, email address, industry type, financial status and details on the owners, operators and directors.

At times, Peoples Group may make certain aggregated non-personal information available to strategic partners and third party service providers that work with Peoples Group, to provide or

support our or their products and services or that help Peoples Group or its strategic partners and third party service providers to conduct data analysis, to develop and improve products and services, and determine the effectiveness of promotional campaigns. We reserve the right to use and share any such non-personal information with third parties for any lawful purpose.

If we ever combine non-personal information with any Personal Information, we will obtain your consent and treat it as Personal Information is treated under this Policy.

6. *General Data Protection Regulation (GDPR)*

The GDPR is a new data protection regulation that affects European Economic Area (EEA) residents only.

As per the GDPR, EEA residents, have certain data protection rights. As an EEA resident, you have:

- the right to access your Personal Information that we hold;
- the right to request the rectification of your Personal Information that we hold;
- the right to request the erasure of your Personal Information that we hold;
- the right to request to restrict processing of your Personal Information;
- the right to object to processing of your Personal Information by us;
- the right to request to transfer your Personal Information that we hold (e., data portability);
- the right to file a complaint to a supervisory authority in your jurisdiction; and
- the right to withdraw consent.

Peoples Group takes reasonable steps to allow you to correct, amend, delete or limit the use of your Personal Information. We have appointed an internal privacy officer to handle any data questions or concerns.

If you wish to be informed about what Personal Information we hold about you or if you want it to be removed from our systems, please contact us at privacyofficer@peoplestrust.com or refer to the "How to contact us" section below.

Peoples Group Online Privacy Policy

While the internet is revolutionizing the way that we do business – providing convenient access to financial services from your home or office – we also recognize that it may bring legitimate concerns about privacy and security.

This Online Privacy Policy describes how your Personal Information is collected, used and disclosed when using or visiting any Peoples Group Website, including the Online Banking site or utilizing any of the online services offered by Peoples Group. Access to your online account, including the Online Banking site, requires you to use your personal customer number and password to enter.

1. *Controlled Access to your Information*

To ensure that you are the only person accessing your Personal Information, we restrict access to your online account by requiring that you enter your customer number and password to login. Only you know your password. Our employees do not have access to your password, and they will not ask you to reveal it. If someone does ask you to provide your password to them, we ask that you refuse to do so and contact us immediately.

2. Online Banking Transactional Services

By nature, our Online Banking site has many transactional functions, such as transfers between accounts. These transactions are all logged to ensure that your accounts are debited or credited appropriately, and a history of each transaction is available to verify your account. We store and use your transactional information in the same fashion as if you performed the transaction at a branch or any other service channel.

3. Online Banking Security

To create a secure channel between your browser and our server, we use 128-bit Secure Socket Layer (SSL) encryption, the highest level available. To learn more about 128-bit SSL encryption, and our security policies, please review our security information.

To provide you with a convenient method for purchasing financial services products, we provide secure online application forms. By nature, these forms capture personally identifiable information that we use to provide you with the products and services that you have requested. This information is processed in a fashion similar to that of application forms received through our other channels. The information contained in the application may be archived or stored, as governed by existing law or policy.

However, despite these measures, our systems could be compromised by parties seeking unauthorized access to our data or users' data, by a technological malfunction or in error by an employee, vendor or contractor. In addition, the transmission of information via the Internet or mobile data networks could be intercepted by third parties. As a result, our efforts to protect our data and users' data from unauthorized access may be unsuccessful and we cannot assure you that the security measures we have adopted will provide absolute certainty. Any transmission by you is at your own risk. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the "How to Contact Us" section below. If we learn of a security systems breach, we will inform you and the appropriate authorities of the occurrence of the breach in accordance with applicable law.

4. Website and Online Banking Usage Statistics

To continually improve our Website and Online Banking site, we often collect information about how our customers are using it. These usage statistics are only viewed in the aggregate – and are never tied to an individual.

We use this information for purposes such as improving the pages where our customers are having difficulties and ensuring that we have the appropriate infrastructure in place to service future needs.

The information collected may include your location, your IP address, your browser type and your operating system, as well as data that is passively generated as you browse, such as the number and types of pages visited, and the length of time spent per page and on the Website or Online Banking site overall.

5. Our use of Cookies

We also use a key web technology called cookies. A cookie is a small information token that sits on your computer or mobile device. As you use any financial services offered through Peoples Group Website, including the Online Banking site, cookies are passed back and forth between our server and your browser. While cookies can be used for a variety of reasons, we only use cookies where they are of benefit to our customers.

Specifically, we use two kinds of cookies – session cookies and persistent cookies. A session cookie exists only for the length of your browsing session and is deleted when you close your browser. A persistent cookie is a cookie that stays on your computer or mobile device after you close your browser. A persistent cookie may or may not expire on a given date. We use a session cookie to maintain the integrity of your internet session. With each page that you visit, the cookie is passed back and forth between our server and your browser. We use the cookie to distinguish your session from the many others that may be happening at the same time. Our session cookies never store any Personal Information, such as your name, or date of birth, or financial information, such as your accounts and balances.

Most recent browser versions allow the user to set some level of control over which cookies are accepted and how your browser uses them. Many browsers will allow you to accept cookies from only known, reliable sites that you select such as the Peoples Group Website or the Online Banking site. If you are concerned about cookies, we encourage you to upgrade your browser to a recent version and review the Help section of your browser to learn more about its specific control features.

6. *Memorized Accounts Feature*

We may use a persistent cookie to store information to help you personalize your online accounts and to make it easier to use. For example, we allow you to make the Online Banking login easier by remembering your Customer Number and Branch within our Memorized Accounts feature. Since the Memorized Accounts feature is optional, this cookie only contains information that you have entered into it.

7. *Logout Button*

To ensure that someone cannot access your Personal Information, always exit your online account using the logout button located at the top of every page. When you exit using the logout button, we delete your session cookie so that your session cannot be resumed unless your customer number and password are re-entered.

8. *Online Banking Enhanced Security Feature*

On the login screen, our Enhanced Security feature provides you even greater control over your privacy.

When you click on the Enhanced Security checkbox, the Online Banking site will prevent your browser from caching (storing in the computer's memory) those pages that you have viewed. Should you click on the Back button to view a previous page during a session, the page will be recalled directly from our server. Therefore, when you logout, no one will be able to view your information by clicking on the Back button, or by viewing the browser's History.

Use this function if you are accessing your accounts from a publicly available computer such as in a library or airport. You may also want to consider using the feature if you are using a computer at work, or a friend's computer, to access your accounts.

Once again, it is important to remind you to always logout of the Online Banking site using the logout button.

9. Online Banking Automatic Session Time-outs

In the event that you leave your computer without logging out, the Online Banking site has been designed to end your session automatically if our system detects that you haven't provided any instructions or used the browser buttons to navigate for several minutes. To restart the session, you will need to provide your password again.

10. Email

If you choose to communicate with us electronically, we strongly recommend that you use our Contact Us feature. This feature provides a secure channel for sending us comments, questions or instructions.

General email is not secure since it passes through many points on its route from you to us. If you are using general email to communicate with us, we strongly recommend that you do not include personal financial information (such as account numbers) within the email as we cannot guarantee its confidentiality en route to us.

When you email us your comments, questions or instructions, you provide us your email address and we use it to correspond with you.

We will not provide your email address to anyone outside of Peoples Group. We may use your email address to send you information about financial products or services that we think may be of interest to you. If you do not want us to contact you with product information by email, you may tell us so at any time by using the Contact Us feature. We will discontinue the practice.

If you have asked us to provide you with information on a regular basis, or if we email you information about our products or services, you may ask us to remove you from the list at any time. We intend to include instructions to unsubscribe from the list in every mailing, and on the site where you originally subscribed to the list.

11. Links to Other Sites

Peoples Group websites, including the Online Banking site, may also contain links to other websites or internet resources. As an example, from time-to-time we may provide links to Microsoft or Netscape to assist you in upgrading your internet browser. However, Peoples Group has no responsibility or liability for or control over these other websites or internet resources or their collection, use and disclosure of your Personal Information. Always review the Privacy Statements of the sites that you are viewing.

You should be aware that off-site pages or other sites might be available only in English or in other languages. Sachez que les pages qui ne figurent pas sur le site Web du Groupe Peoples ou certains autres sites pourraient n'être disponibles qu'en anglais ou dans d'autres langues.

Where we store your Personal Information

The Personal Information you provide to us is primarily stored on servers in Canada. However, we maintain secondary disaster data back-up on computer systems that may be located outside of Canada. Personal

information collected by us pursuant to our Privacy Policy may be stored, whether as part of our secondary disaster data back-up or otherwise, on out-of-country computer systems, and therefore may be subject to disclosure pursuant to the laws of the jurisdictions where such Personal Information data is stored. Peoples Group will disclose Personal Information as required by law.

Canada's Anti-Spam Legislation ("CASL")

Peoples Group complies with CASL and we are committed to making sure you only receive the email communications that you want from us. Peoples Group will never send you unsolicited emails in connection with the marketing of Peoples Group, its services or products.

We may send you emails if you signed up to join our email list at a trade show or conference. We occasionally send emails to members of mailing lists shared with us from other organizations who have received your opt-in consent. Usually, this is from industry related advisory groups. We may occasionally contact you to notify you about updates to the Website or new products or services offered by us, or to deliver targeted information that may be of interest to you.

No matter how you join our list or provide us with your consent to receive communications, at the bottom of all our emails, you will find a clear, easy way to unsubscribe.

For more information about our Anti-Spam Policy or if you have questions or a complaint related to CASL, you may contact our CASL Compliance Officer immediately by phone at 1-855-683-2881, by e-mail to caslofficer@peoplesgroup.com, or by mail to: CASL Compliance Officer, Peoples Group at 1400 – 888 Dunsmuir Street, Vancouver, BC, V6C 3K4.

Monitoring of telephone calls

Peoples Group may monitor and/or record in-bound and out-bound telephone calls as permitted by law for training and quality assurance purposes, to detect and prevent fraud or other losses, and to enforce our contracts. Any recording obtained from monitoring telephone calls is treated as confidential.

How to contact us

If you have any questions, concerns or complaints about our privacy policies or are uncomfortable about any information or requests you receive from Peoples Group via phone, fax or email, we encourage you to contact us immediately at 1-855-683-2881. In most cases, any questions or concerns that you have can be resolved by discussing it with us or our Privacy Officer.

You may contact our Privacy Officer:

- By phone: (604) 683 - 2881
- By e-mail: privacyofficer@peoplesgroup.com
- By mail to:

ATTN: Privacy Officer
Peoples Group
#1400, 888 Dunsmuir Street
Vancouver, British Columbia
V6C 3K4

If you are not satisfied with how we have attempted to resolve your questions, concerns or complaints, please consult the federal or provincial privacy commissioner in your jurisdiction whose information can be found online at the below sites.

Canada www.priv.gc.ca

British Columbia www.oipc.bc.ca

Ontario www.ipc.on.ca

Alberta www.oipc.ab.ca

Protecting your privacy – we’re in it together

This policy is subject to change. Please review it from time to time. If we make changes, we will amend the “revised” date at the bottom. Any changes will become effective when we publish the revised Policy. If we make any material changes, we will notify you by mail, email or by means of a notice on the Website commensurate with or prior to the change becoming effective.