

## Bridgewater Bank Privacy Policy

### Introduction

Bridgewater Bank is committed to respecting the privacy rights of all its current, past and prospective customers. This Bridgewater Bank Privacy Policy affirms our commitment to privacy. It describes how the personal information of customers is collected, used and disclosed. Personal information is defined as information about an identifiable individual as set out in the Personal Information Protection and Electronic Documents Act ("PIPEDA"). Personal information can include things such as your name, address, telephone number, email address, date of birth, annual income, credit and transaction history.

### Scope

This privacy policy applies no matter how customers choose to interact with Bridgewater Bank, whether in person, online, by mail or over the telephone.

### The ten principles of privacy

This privacy policy complies with the requirements as set out in PIPEDA. These are the ten principles of privacy as follows:

#### 1. Accountability

Bridgewater Bank is responsible for the personal information under its control and will designate one or more persons to ensure organizational accountability for compliance with the ten principles of privacy. All Bridgewater Bank employees are accountable for the protection of customers' personal information.

#### 2. Identifying purposes

Bridgewater Bank will identify the purposes for which personal information is collected at or before the time the information is collected.

#### 3. Consent

Consent is required for Bridgewater Bank's collection, use or disclosure of personal information, except where required or permitted by PIPEDA or other law. In addition, when customers apply for a product or service offered by Bridgewater Bank, consent is deemed to be granted. Express consent may be obtained verbally, in writing or through electronic means. Alternatively, consent may be implied through the actions of customers or continued use of a product or service following Bridgewater Bank notification of changes.

#### 4. Limiting collection

Personal information collected will be limited to that which is necessary for the purposes identified by Bridgewater Bank.

#### 5. Limiting use, disclosure and retention

Bridgewater Bank will not use or disclose personal information for purposes other than those for which the information was collected, except with the customer's consent or as required by law. Bridgewater Bank will retain personal information only for as long as is necessary to fulfill the purposes for collecting such information and compliance with any legal requirements. Bridgewater Bank employs retention standards that meet these requirements. Bridgewater Bank will destroy personal information when it is no longer required.

#### 6. Accuracy

Personal information will be maintained by Bridgewater Bank in an accurate, complete and up-to-date format as is necessary for the purpose(s) for which the personal information was collected.

#### 7. Safeguards

Bridgewater Bank will protect personal information with security safeguards appropriate to the sensitivity of such information.

## 8. Openness

Bridgewater Bank will make its policies and practices relating to the collection and management of personal information readily available.

## 9. Customer access

Bridgewater Bank will inform customers of the existence, use and disclosure of their personal information and will provide access to their personal information, subject to any legal restrictions. Bridgewater Bank may require written request for access to personal information and in most cases, will respond within 30 days of receipt of such requests. Customers may verify the accuracy and completeness of their personal information, and may request the personal information be corrected or updated, if appropriate.

## 10. Challenging compliance

Customers are welcome to direct any questions or inquiries concerning Bridgewater Bank's compliance with Bridgewater Bank's Privacy Policy to the privacy officer: [privacy@bridgewaterbank.ca](mailto:privacy@bridgewaterbank.ca)

### **Types of personal information may be collected and used**

In providing services to customers, Bridgewater Bank may need to collect personal information. In most cases, consent to do so is granted by the customer when applying for a product or service. Depending on the product or service being requested, the following personal information may be collected from any source.

- Identification information such as name and date of birth;
- Contact information such as name, address and personal home numbers;
- Documents to verify your identity such as a driver's license, passport or utility bill;
- Current financial figures such as annual income, assets, liabilities and credit history;
- Health information if a customer would like to apply for certain insurance products;
- Information on third-parties such as a spouse or children;
- Information about authorized persons when dealing with a legal entity such as a corporation;
- Social Insurance Number ("SIN") when a customer opens an interest bearing account, or if the customer consents to the use of the SIN to verify and report credit information to credit bureaus and credit reporting agencies;

Bridgewater Bank may monitor and record telephone calls between you and our representatives to ensure service quality and security, and to confirm our discussions with you.

### **Why Bridgewater Bank collects personal information**

Bridgewater Bank is committed to providing innovative financial products and services. Customers may request or apply for new products or services, or require these services provided by Bridgewater Bank be maintained (collectively the "services"). Bridgewater Bank collects and uses personal information for the purpose of providing its services.

Bridgewater Bank may review and analyze personal information which is provided by or collected about the customer for the following purposes:

- Verify customer identity;
- Check and verify employment;
- Obtain a credit report and exchange information with a credit bureau;
- Understand customer needs;
- Determine the suitability and eligibility of services to the customer;
- Send customers information about products and services;
- Set up and manage services;

- Provide services on an ongoing basis;
- Meet legal and regulatory requirements;
- Manage and assess our risks and to prevent or detect fraud or criminal activity.

### **Disclosure of your personal information**

While providing services, Bridgewater Bank may:

- Disclose to credit bureaus or financial services industry databases, credit and other information about customers in order to determine the customer's eligibility for services.
- Contract with certain service providers and investors approved by Bridgewater Bank and allow them to access personal information. All third-parties who may have access to personal information are bound by strict contractual obligations designed to protect the privacy and security of your personal information.
- Share personal information with Bridgewater Bank's sole parent company and its affiliates who may use such personal information as permitted by law and their privacy policies.
- Disclose your personal information to the Canada Revenue Agency or other authority as required by statute or by court order, or as may be permitted by PIPEDA.

### **Transfer of personal information outside Canada**

While Bridgewater Bank endeavors to keep, store and handle customer data within locations in Canada, the Bank may use agents or service providers located in the United States (U.S.) to collect, use, retain and process personal information as part of providing services to you. While the Bank uses all reasonable efforts to ensure that personal information receives the same level of security in the U.S. as it would in Canada, please be aware that privacy protections under U.S. laws may not be the same.

### **Your personal information is used for proper purposes only**

Bridgewater Bank will safeguard your personal information and use it only for the purpose(s) it was collected or as permitted under applicable laws and this privacy policy. Bridgewater Bank will not sell, lease or give away your personal information.

### **Website cookies**

When you visit Bridgewater Bank's website, your personal information is not recorded. However, Bridgewater Bank does track depersonalized usage of its website using tools such as Google Analytics, Hotjar and visitor location features. These tools use third-party cookies to better track user data and identify you as a return visitor.

Our email interactions with our customers are compliant with Canadian Anti-Spam Legislation. Bridgewater Bank does not send unsolicited email to persons with whom we have no relationship.

Bridgewater Bank will not sell personal information, such as email addresses, to unrelated third-parties. On occasion, your personal information may be provided to our third-party partners to administer the products and services you request from Bridgewater Bank.

When you leave Bridgewater Bank's website by linking to another website, you are subject to the privacy and security policies of the new website. Bridgewater Bank encourages you to read the privacy policies of all websites you visit, especially if you shared any personal information with them.

### **Refusing or withdrawing consent**

Subject to some restrictions, customers can at anytime refuse to consent, or continue to consent to the collection, use or disclosure of their personal information by notifying Bridgewater Bank. Withdrawal of consent may impact Bridgewater Bank's ability to provide or continue to provide services. Customers cannot refuse collection, use and disclosure of their personal information if such information is required to:

- Fulfill the terms of any contractual agreement made by the customer;
- Be collected, used or disclosed as required by any law or
- Be collected, used or disclosed as required by any regulators, including self regulatory organizations.

### Questions, complaints and access

If you need to update or correct your address, phone number or payment information **please contact the Bridgewater Bank Customer Experience Department at 1.866.243.4301**. If you wish to make an access to information request to view your personal information, or if you have questions, concerns or complaints, please contact the following in writing:

#### Privacy Officer:

Bridgewater Bank  
Suite 150, 926 – 5th Ave SW  
Calgary, AB T2P 0N7  
Tel: 403.410.1358 or 1.866.243.4308  
Fax: 403.410.1374  
Email: [privacy@bridgewaterbank.ca](mailto:privacy@bridgewaterbank.ca)

#### If your concern or complaint is not resolved to your satisfaction, please contact the Bridgewater Bank Ombudsman:

P.O. Box 8180, 10310 GA MacDonald Ave  
Edmonton, AB T6H 5X9  
Toll Free: 1.855.330.5580  
Email: [ombudsman@bridgewaterbank.ca](mailto:ombudsman@bridgewaterbank.ca)

#### If the above steps fail to resolve your concern, you may also contact the Office of the Privacy Commissioner of Canada:

Place de Ville  
112 Kent Street, 3rd Floor  
Ottawa, ON K1A 1H2  
Call toll free at 1.800.282.1376  
[www.privcom.gc.ca](http://www.privcom.gc.ca)

#### Fees

Bridgewater Bank may charge, in accordance with applicable laws, a reasonable fee for access to personal information and for providing copies of personal information requested.

#### Amendments

You acknowledge that we may amend this agreement on occasion to take into consideration changes in legislation or other issues that may arise. We will post the revised agreement at [www.bridgewaterbank.ca](http://www.bridgewaterbank.ca) and may make printed copies available.