



Bridgewater Bank Privacy Policy

Introduction

Bridgewater Bank is committed to respecting the privacy rights of its current, past and prospective customers. The 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 your name, address, telephone number, email address, date of birth, annual income, and credit and transaction history.

Scope

This privacy policy applies to in person, online, mail, and telephone interactions:

The ten principles of privacy

This privacy policy complies with the ten principles of privacy set out in PIPEDA:

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 protecting 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 laws. In addition, when customers apply for a product or service offered by Bridgewater Bank, consent is deemed granted. Express consent may be obtained verbally, in writing, or electronically. Alternatively, consent may be implied through customers' actions or continued use of a product or service following Bridgewater Bank's notification of changes.

4. Limiting collection

Bridgewater Bank will only collect personal information necessary for the purposes identified by Bridgewater Bank or as permitted by law.

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 only retain personal information for as long as is necessary to fulfill the purposes for which it was collected and/or to comply with any legal requirements. Bridgewater Bank's retention standards meet these requirements. Bridgewater Bank will destroy personal information when it is no longer reasonably required.

6. Accuracy

Bridgewater Bank will keep personal information as accurate, complete, and up-to-date as necessary for the purpose(s) for which it was collected.

7. Safeguards

Bridgewater Bank will protect personal information with security safeguards appropriate to its sensitivity.

8. Openness

Bridgewater Bank will make its policies and practices relating to collecting and managing personal information readily available.





9. Individual access

Upon request, Bridgewater Bank will inform customers of the existence, use and disclosure of their personal information, and (subject to any legal restrictions) will provide customers with access to their personal information. Bridgewater Bank may require customers to send a written request for access to personal information. In most cases, it will respond to a written request within 30 days of receiving them. Customers may verify the accuracy and completeness of their personal information, and may request that their personal information be corrected or updated if necessary.

10. Challenging compliance

Customers are welcome to direct any questions or inquiries concerning Bridgewater Bank's compliance with its Privacy Policy to the privacy officer at privacy@bridgewaterbank.ca

Types of personal information that may be collected and used:

Bridgewater Bank may need to collect personal information to provide service to customers. In most cases, the Bank will obtain consent to gather personal information when the customer applies 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 telephone numbers
- Documents to verify a customer's identity, such as a driver's license, passport, or utility bill
- Current financial information 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 (if dealing with a legal entity such as a corporation)
- Social Insurance Number ("SIN") (if a customer opens an interest-bearing account, or if the customer consents to the use of their SIN to verify and report credit information to credit bureaus and credit reporting agencies)

Bridgewater Bank may monitor and record telephone calls between customers and its representatives to ensure service quality and security and to confirm the content of these conversations.

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 to provide its services.

Bridgewater Bank may review and analyze personal information provided by, or collected about, the customer to:

1. Verify customer identity
2. Check and verify employment
3. Obtain a credit report, and exchange information with a credit bureau
4. Understand a customer's needs
5. Determine if a customer is eligible for services and if those services are suitable for the customer
6. Send customers information about products and services
7. Set up and manage services





8. Provide services on an ongoing basis
9. Meet legal and regulatory requirements
10. Manage and assess risk, and prevent or detect fraud or criminal activity

Disclosure of personal information

While providing services, Bridgewater Bank may:

- Disclose to credit bureaus or financial services industry databases credit and other information about customers 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 endeavours to keep, store, and handle customer data within locations in Canada, the Bank may use agents or service providers located outside of Canada to collect, use, retain, and process personal information as part of providing services to you. While the Bank makes all reasonable efforts to ensure that your personal information receives the same level of security in other countries as it would in Canada, please be aware that data protection rules and privacy laws in other jurisdictions may differ. As a result, personal information stored or accessed outside of Canada may be subject to the laws of those countries; and may be shared with law enforcement officials, government authorities, and courts in that country.

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 personal information, such as email addresses, to unrelated third parties. Occasionally, your personal information may be provided to our third-party partners to administer the products and services you request from Bridgewater Bank.

Website cookies

Bridgewater Bank uses cookies on our website. By visiting our website, you consent to the use of cookies. "Cookie" is a generic term that refers to a text file containing small amounts of information which is downloaded to your hard disk or to your browser's memory when you visit a website. A cookie file often allows the website to recognize you, make your next visit easier, and make the services provided by the website owner more useful to you.

Bridgewater Bank tracks depersonalized usage of its website using analytics tools, such as Google Analytics, Hotjar.com, and visitor location features to help us understand how our website visitors navigate and use our website. These tools use third-party cookies to track user data better and identify you as a return visitor. Most web browsers will allow you to see what cookies you have, and you can manually delete them individually or block all cookies by adjusting the settings on your browser.

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 share any personal information with them.

Refusing or withdrawing consent

Our email interactions with our customers comply with Canadian Anti-Spam Legislation.

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.

Updating Personal Information

Bridgewater Bank must maintain accurate and up-to-date information about its customers. To update or correct contact information (e.g., mailing address, phone number, email address) or to verify the accuracy of contact information, customers should contact the Bridgewater Bank Customer Experience Department.

Customer Experience Specialists are available by email and telephone between 7 a.m. to 5 p.m. (MST), Monday – Friday.

Phone: 1.866.243.4301

Email: customer.experience@bridgewaterbank.ca

Access to Information Requests

To view or receive copies of personal information, customers may submit a written request to Bridgewater Bank's Privacy Officer. The written request can be submitted by mail, fax, or email. Bridgewater Bank may (in accordance with applicable laws) charge a minimal fee for access to personal information and for providing copies of personal information.

Bridgewater Bank will respond to requests for personal information within 30 calendar days of receiving the written request. Please note, there may be instances where access is restricted, such as where information is subject to legal privilege, is confidential commercial information, or is information relating to a third party. When possible, Bridgewater Bank will notify customers of the reasons for restricting access in writing.

The estimated fee for access (if any) will be assessed by the Bridgewater Bank Privacy Office, who will provide the customer with a written estimate of the costs if applicable. Customers must respond to the Privacy Office to confirm acceptance of the estimated fees. If the customer does not respond within 30 days of receiving the fee estimate the Privacy Office will deem the access request withdrawn.

Bridgewater Bank Privacy Office

P.O. Box 8180

Edmonton, AB T6H 5X9

Fax: 1.780.430.5751

Email: privacy@bridgewaterbank.ca

Privacy-Related Concerns & Questions

1. Contact Bridgewater Bank

If customers have questions about Bridgewater Bank's Privacy Policy they may contact Bridgewater Bank Customer Experience Specialists. In most cases, Customer Experience Specialists can answer privacy-related questions or address concerns immediately. Customers should gather pertinent information (account numbers, transaction dates and details, etc.) before contacting the Customer Experience Department.

Customer Experience Specialists are available by email and telephone between 7 a.m. to 5 p.m. (MST), Monday – Friday.

Phone: 1.866.243.4301

Email: customer.experience@bridgewaterbank.ca



2. Escalate to the Bridgewater Bank Privacy Officer

If a privacy-related concern remains unresolved after speaking to a Customer Experience Specialist, the customer may escalate the matter to Bridgewater Bank's Privacy Office.

Bridgewater Bank Privacy Officer

P.O. Box 8180
Edmonton, AB T6H 5X9
Fax: 1.780.430.5751
Email: privacy@bridgewaterbank.ca

3. Escalate to the Bridgewater Bank Chief Privacy Officer

If a customer's concern has not been resolved after following steps one and two they may contact Bridgewater Bank's Chief Privacy Officer. The customer will receive a written response once the review is complete.

Bridgewater Bank Chief Privacy Officer

P.O. Box 8180
Edmonton, AB T6H 5X9
Fax: 1.780.430.5751
Email: chiefresolution@bridgewaterbank.ca

4. Contact the Office of the Privacy Commissioner of Canada (OPC)

If, after consulting with the Bridgewater Bank Chief Privacy Officer, a customer is unsatisfied or feels the above steps have not adequately addressed their concern, they may contact the Office of the Privacy Commissioner of Canada (OPC).

Office of the Privacy Commissioner of Canada

30 Victoria Street
Gatineau, Québec K1A 1H3
Toll-free: 1.800.282.1376
Phone: 1.819.994.5444
Fax: 1.819.994.5424
Website: priv.gc.ca/en/

Amendments

Bridgewater Bank reviews this Privacy Policy annually to ensure it is doing all it can to protect your privacy. It may amend this Privacy Policy on occasion due to changes in legislation, regulations, industry standards, or other issues that may arise. Changes to the Privacy Policy will be posted on the Bridgewater Bank website at www.bridgewaterbank.ca/privacy, and printed copies will be made available upon request.

