

## **Rogers Bank Privacy Notice**

Rogers Bank is committed to protecting your privacy and ensuring the security of your personal information.

The following principles apply to all of our dealings with you and explain how Rogers Bank uses, shares, and safeguards your personal information.

We strongly encourage you to refer to this privacy notice often for the latest information about our privacy practices.

### **We ask our customers for no more personal information than necessary.**

Rogers Bank needs to collect personal information from our clients and prospective clients to provide services to you and fulfill our legal obligations. We limit our collection of personal information to only what is necessary.

We, either directly or through our agents, representatives, service providers or other third parties, may collect various types of personal information about you over the course of our relationship with you, such as:

- identity information, such as your name and birth date;
- contact information, such as your email address, mailing address, and phone number;
- details about transactions you make through us or others;
- application information, such as your annual income, place of employment, and financial obligations;
- financial behaviour, such as information about your payment history and credit worthiness;
- products or services you receive from the Rogers Communications Inc. Organization; or
- other information obtained with your consent, or collected as permitted or required by law.

### **We limit the use of personal information.**

Rogers Bank may collect your personal information for a number of reasons, including:

- verifying your identity and other information you have provided to us;
- evaluating your application and assessing your eligibility for our products or services;
- opening and servicing your account;

- managing credit risk, undertaking debt collection activities, or providing information about your credit behaviour to credit reporting agencies or other parties collecting outstanding debt;
- marketing products, services or offers to you, including those offered by our agents or dealers, members of the Rogers Communications Inc. Organization, or other companies;
- managing business risks;
- monitoring your compliance with any of your agreements with us;
- facilitating our communications with you, including to provide you with newsletters, surveys, electronic messages or information you may request from us;
- detecting and preventing fraud and other unauthorized or illegal activities;
- evaluating an application for employment or other work with Rogers Bank;
- meeting legal and regulatory requirements; or
- as otherwise required or permitted by applicable law.

Your personal information may also be anonymized or aggregated with that of others, to enable us to manage our business, identify trends, develop statistical information, understand how we are performing, or develop relevant products, services or offers. Any anonymized or aggregated information will not personally identify you.

### **We are transparent about how we collect personal information.**

Rogers Bank obtains most of your personal information directly from you and will only do so with your implied or express consent, or as otherwise permitted or required by law.

On occasion, we may collect personal information about you from third parties, such as from those who are authorized by you to disclose your personal information to us, from credit bureaus, from references you provide, from members of the Rogers Communications Inc. Organization, from government or financial institutions, or from public sources or records.

Communications between you and our representatives may be monitored or recorded to maintain quality service, to protect you and Rogers Bank, to confirm our discussions with you, or for training purposes. We may also use surveillance, such as videotaping, for in-person interactions with you for the safety of our customers, employees and others, to protect against illegal activity, such as theft, vandalism and fraud, or to ensure we are providing you with quality service.

If you believe that a third party has inappropriately disclosed your personal information to us, please contact that third party directly. If the third party does not sufficiently respond to your inquiries, please contact the Rogers Bank Privacy Officer (see below for contact details).

Rogers Bank may use certain web technologies, such as web beacons and cookies, to enhance your experience on Rogersbank.com, to assess the value of our communications to you, or to deliver content that is specific to your interests.

Web beacons are tiny graphic images that we may embed on website pages or in emails to allow us to measure response rates to our communications and ascertain whether content has been accessed. We use the information discovered by web beacons to improve our web pages and promotions.

Cookies are small files created by a web server and stored on a user's computer to help websites remember certain information about the user. Cookies collect, encrypt and store information to record user preferences and enhance the user experience. For example, Rogers Bank uses cookies on RogersBank.com to record language preferences and to let users avoid logging-in repeatedly while they are visiting our webpages. Please consult your browser's online help function for information on how to tailor your cookie settings to suit your needs.

When you submit an application or transaction at RogersBank.com, we may collect, use and disclose your IP address or device attributes for validation purposes, to log requests to the server, or to detect, manage, investigate or prevent fraud, money laundering, or other unauthorized or illegal activities.

### **We restrict disclosure of personal information**

Rogers Bank will share your personal information as follows:

- a) To provide you with products or services

In order to evaluate an application for our products or services, or over the course of our relationship, we may disclose your personal information to credit bureaus, credit reporting agencies, or to your current or future creditors to determine your credit worthiness, to determine or maintain your credit history, or to obtain credit references. From time to time, we may disclose your credit history with us to other lenders or credit reporting agencies to support the credit process.

We may also disclose your personal information to third party agents, contractors, or services providers performing certain services on our behalf, including:

- website maintenance;
- marketing;
- mail distribution;
- account statement production;
- customer service;

- provisioning of additional services, such as optional balance insurance or protection services; or
- data processing.

We provide these parties only with the limited information that is necessary to perform the services, and we contractually hold them to privacy standards that are consistent with our privacy principles and applicable legal requirements.

b) To comply with the law

Your personal information may be disclosed in situations where we are legally required to disclose it, such as in relation to a criminal investigation or government reporting requirements. In some instances, we may also be required to disclose your personal information to authorities, such as in response to a search warrant, court order or other demand or inquiry. In those cases, only the information specifically requested is disclosed, and we take precautions to satisfy ourselves that the authorities in question have legitimate grounds to request your information.

c) To protect you

Where we reasonably believe you might be a victim of fraud, financial abuse, or other illegal activity, we may disclose your personal information to appropriate legal or governmental authorities, to your next of kin, or any other appropriate person.

d) To protect us

We may release your personal information to another person or organization, including members of the Rogers Communications Inc. Organization or any investigative body, to protect our rights, assets, or interests. For example, we may share your personal information with another person or organization:

- where we are involved in a judicial, administrative or regulatory proceeding, or similar process involving the enforcement of any of our rights;
- to comply with any legal or regulatory obligations;
- to prevent, detect, investigate or suppress financial abuse, fraud, money laundering, or other criminal or illegal activity;
- to manage credit risk or other business risks; or
- to undertake debt collection activities.

e) In the context of a business transaction

We may share your personal information with third parties in the context of a proposed or actual business transaction, such as a sale or other disposal of all or part of our business or assets, for purposes of evaluating or performing the transaction.

These purposes may include, as an example, permitting parties to the transaction to determine whether to proceed or continue with the transaction. We require that the confidentiality of your personal information be preserved, and we limit the use of your personal information to the purposes of evaluating or performing the transaction. In the event the transaction does not go through, we will require, by contract, the other parties to the transaction not to use or disclose your personal information in any manner whatsoever, and to return or destroy such personal information. Any of our successors or assigns will be permitted to collect, use and disclose your personal information for substantially the same purposes as those set out in this notice.

f) To members of the Rogers Communications Inc. Organization

Rogers Bank and the Rogers Communications Inc. Organization can offer you a more seamless and meaningful customer experience by sharing information. If you wish to opt-out of this sharing of information, please contact our Chief Privacy Officer (see below for contact details).

If you remain opted-in to sharing information, Rogers Bank may engage the Rogers Communications Inc. Organization to:

- determine whether you are a customer of the Rogers Communications Inc. Organization;
- confirm or authenticate your identity;
- confirm that your information is correct and up-to-date; market or not market, as the case may be, certain products, services or offers to you; provide certain products, services or offers to you;
- fulfill any special offers; perform analytics or conduct market research;
- better understand your needs; or
- process loyalty credits earned through credit card usage as part of a rewards program.

We will only share personal information that is required to complete the above activities with the Rogers Communications Inc. Organization. Further, unless we have your express consent or as otherwise permitted or required by law, Rogers will not disclose the following information to members of the Rogers Communications Inc. Organization:

- your social insurance number;
- your employment information (e.g. employment status, occupation, employer name);
- your income particulars;
- your credit limit particulars; or
- your transaction level information.

Any personal information shared with the Rogers Communications Inc. Organization will be subject to its privacy policy ([Privacy Policy - Rogers](#))

g) Other

Rogers Bank may also disclose your personal information as follows:

- to a person who, in our reasonable judgment, is seeking your personal information as your agent, with your consent; or
- as otherwise required or permitted by law.

### **We protect personal information.**

Rogers Bank protects your information with appropriate safeguards and security measures.

Access to private, sensitive and confidential information, including your personal information, is restricted to authorized employees or service providers with legitimate business reasons.

We use modern technologies to ensure that your personal information is not compromised. Paper-based files are stored in locked filing cabinets to which access is also restricted. When you speak with any of our customer service representatives, you will be required to verify your identity.

Except as otherwise permitted or required by law, we only retain your personal information for so long as it is reasonably necessary to fulfil the purposes for which it was collected, or for sufficient time to allow you access to the information if it was used to make a decision about you, your account, or your relationship with Rogers Bank. Once we no longer require your personal information, it will be destroyed or de-identified.

Your personal information may be stored or processed in or outside Canada and will be protected with appropriate safeguards. However, if your personal information is stored outside of Canada, it may be subject to the laws of the jurisdiction where it is held.

### **We respect your privacy preferences.**

You are always in control of your personal information and providing Rogers Bank with your information is always your choice. You can withdraw your consent to the processing of your personal information (where we are processing your personal information based on your consent). If you object to the processing of your personal information, or if you have provided your consent and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations. However, your decision to withhold particular details may limit or prevent us from providing you services or products.

If you do not wish to receive promotional materials from us, or you do not want your personal information shared (as outlined above), please contact our Chief Privacy Officer (see below for contact details).

**We take privacy seriously.**

Rogers Bank has appointed a Chief Privacy Officer who oversees Rogers Bank’s privacy compliance. Other individuals within Rogers Bank may be delegated to act on behalf of the Chief Privacy Officer and take responsibility for day-to-day compliance with applicable privacy legislation and Rogers Bank’s collection, use, or disclosure of personal information.

We invite any customer to contact the Chief Privacy Officer, at the contact information set out below, for any additional clarification desired.

**We provide you with access to your information.**

Individuals have the right to access, update, and correct inaccuracies in their personal information in Rogers Bank’s custody and control, subject to certain exceptions prescribed by law. To do so, you may contact Rogers Bank’s Chief Privacy Officer at the contact information below.

<b>Email</b>	<b>Mail</b>
<a href="mailto:rogersbankprivacy@rci.rogers.com">rogersbankprivacy@rci.rogers.com</a>	Rogers Bank Attention: Chief Privacy Officer 1 Mount Pleasant Rd, Toronto, Ontario M4Y 2Y5

If your privacy concerns are not addressed to your satisfaction by Rogers Bank, you may contact the Office of the Privacy Commissioner of Canada ([www.priv.gc.ca](http://www.priv.gc.ca)) at the contact information below.

<b>Email</b>	<b>Mail</b>
1-800-282-1376	Office of the Privacy Commissioner of Canada 30 Victoria Street Gatineau, Quebec K1A 1H3