

## CUSTOMER PRIVACY POLICY

Bank of China (Canada) and its affiliates (collectively, the “**Bank**”, “**we**”, “**our**” or “**us**” recognize the importance of privacy. The purpose of this Privacy Policy is to inform you about our privacy practices, including how we collect, use, and disclose your personal information.

### What This Privacy Policy Covers

This Privacy Policy covers the following topics:

- [Personal Information We Collect](#)
- [How We Use Your Personal Information](#)
- [How We Share Your Personal Information](#)
- [Your Consent to the Collection, Use and Disclosure of Your Personal Information](#)
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### Personal Information We Collect

“Personal information” means information about an identifiable individual as described under Canadian privacy laws.

Personal information does not include any business contact information that is solely used to communicate with you in relation to your employment, business or profession, such as your name, position name or title, work address, work telephone number, work fax number or work e-mail address.

This Privacy Policy does not apply to the extent we process personal information in the role of a processor or service provider on behalf of our customers. It is that customer’s

privacy policy that applies; we conduct such activities strictly in accordance with our customer's instructions and pursuant to our contractual arrangements with the customer. If you are an end user or consumer with an existing relationship with one of our customers, you should refer to the customer's website to understand their privacy practices and policies.

We may collect, use, and disclose different types of personal information, depending on our relationship with you. Generally, we collect the following types of personal information (not all of which may apply to you):

- **identity information**, such as your name, username or similar identifier, marital status, title, gender, date of birth, passport number, driver's licence and social insurance number;
- **contact information**, such as your billing address, delivery address, home address, e-mail address and telephone numbers;
- **transaction and financial information**, such as information you provide on application forms (i.e., income, financial statements, employment history, records of personal property, credit history and/or reports), your account number and payment card details used to provide banking services, or transactions arising from your relationship with and through us and other financial institutions;
- **technical and usage information when you use our website**, such as your internet protocol (IP) address, login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website;
- **event participation information**, such as your enrollment and attendance at our events;
- **information about third parties**, such as your beneficiaries, spouses, common-law partners, or dependents who are part of your banking service with us;
- **information provided via surveys and contests**; and
- **marketing and communications information**, such as your preferences for receiving our newsletter.

We also collect, use, and share aggregated and anonymized data for any purpose. Aggregated and anonymized data is not considered personal information because it cannot be used to identify you.

### **How We Use Your Personal Information**

We generally use your personal information for the following purposes:

- to verify your identity;

- to provide you with our banking products and services, conduct transactions, or establish a business relationship;
- to determine your eligibility for our services and fulfill your financial requests and applications in accordance with applicable laws and our policies;
- if you use any of our technology applications, to administer your use of those applications;
- if you visit our premises, to ensure your safety and security (which may include video surveillance);
- to respond to your inquiries, complaints or requests;
- to communicate with you, including through our newsletter, other member communications, and other platforms;
- to manage our business and our arrangements with our clients, including to detect and prevent errors and fraud;
- to improve the effectiveness and efficiency of our operations, products, services, and programs;
- to meet legal, regulatory, and tax obligations;
- to investigate legal claims and protect our rights, operations or property;
- for such other purposes as you may consent to from time to time; and
- as otherwise required or permitted by law.

### **How We Share Your Personal Information**

We generally identify to whom, and for what purposes, we will disclose your personal information (and we obtain your consent to such disclosure) at the time we collect your personal information. For example, we may obtain your consent to disclose your personal information to third party service providers for the purpose of conducting credit checks.

We may disclose your information when we believe such disclosure is required or permitted by law. In addition, we may disclose your personal information to a third party in the event of any significant business transaction, such as a merger or reorganization.

We rely on service providers to perform a variety of services on our behalf, such as identification and know-your-client service providers, ATM service providers, loan review service providers, payment card processors, technical support providers, and data storage and processing service providers. We may also share your information with insurance

companies, public authorities (i.e., governments, regulators, and courts), and your representatives and beneficiaries.

If we transfer your personal information to a service provider, we require that they maintain the confidentiality of your personal information and keep it secure. We also require that our service providers comply with applicable privacy laws and only use your personal information for the limited purposes for which it is provided.

### **Your Consent to the Collection, Use and Disclosure of Your Personal Information**

We collect, use, and disclose your personal information with your consent or as permitted or required by law. How we obtain your consent, including whether it is express or implied, will depend on the circumstances and the sensitivity of the personal information in question. Generally, we will seek your consent at the time we collect your personal information, either orally, electronically, or in writing.

If you provide personal information about another individual to us, it is your responsibility to obtain the consent of that individual to enable us to collect, use and disclose their information as described in this Privacy Policy.

If you wish to withdraw your consent to our collection, use or disclosure of your personal information, please contact us using the contact information in the “How to Contact Us” section below. We will accommodate your request to withdraw consent, subject to legal or contractual restrictions. Withdrawal of your consent may mean that we will no longer be able to provide you with certain products or services.

### **Our Use of Cookies**

A “cookie” is a small text file that contains information and is stored on your computer. We use cookies and similar tracking technologies, such as web beacons and pixels, to automatically collect information about your use of our website and your interaction with our emails. Information we collect may include your IP address (or proxy server), device and application identification numbers, location, browser type, internet service provider and/or mobile carrier, pages and files viewed, searches, operating system and system configuration information, and date/time stamps associated with your usage.

We use this information to facilitate the use of our website, for our business or analytical purposes (including to assess website traffic and track search criteria), and to personalize web pages according to your choices and interests.

We may also use this information to engage in interest-based advertising (also known as targeted or behavioral advertising) in connection with your use of our website, and across third-party websites or service offerings when you leave our website. Interest-based advertising means that your preferences and interests are collected through cookies or similar technologies and then used to provide you with advertising and marketing materials that are relevant to you, based on those preferences and interests.

If you do not wish to accept cookies, you can adjust your web browser settings so that you automatically deny the storage of cookies or are informed each time a website requests to store a cookie. Previously stored cookies can also be deleted through your web browser. Please refer to your web browser's help pages for more information. Some areas or features of our website rely on cookies and may not work if you delete or decline cookies. For more information about cookies generally please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

### **Opting Out of Marketing Communications**

If you no longer want to receive marketing-related e-mails from us, you may opt out of receiving marketing-related e-mails by clicking the “unsubscribe” link at the bottom of any e-mail you receive from us. You may also opt out by contacting us directly using the contact information in the “How to Contact Us” section below.

Please note that if you opt out from receiving marketing-related e-mails, we may still need to send you communications about your use of our products or services, or other matters.

### **Retention, Storage, and International Transfer of Personal Information**

We will retain your personal information for as long as necessary to fulfill the purposes for which we collected it, and as permitted or required by law.

We may transfer your personal information outside of Canada to fulfil the purpose for which we collected it, including for processing and storage by service providers. While your personal information is outside of Canada, it is subject to the laws of the country in which it is located, which may have different data protection laws than Canada. Those laws may require disclosure of your personal information to authorities in that country. For more information about our policies and practices regarding service providers outside of Canada, contact us using the contact information in the “How to Contact Us” section below.

### **Information Security**

We have implemented physical, organizational, contractual, and technological security measures in an effort to protect your personal information from loss or theft, unauthorized access, use, or disclosure.

Despite these measures, we cannot guarantee that our safeguards will always be effective. A breach of security safeguards can result in risks such as phishing and identity theft. In such cases, we will act promptly to mitigate the risks and to inform you where there is a real risk of significant harm, or as otherwise required by law.

We may also require that you assist us in safeguarding your personal information. For example, if you create an account through our website or applications, you should use a unique and strong password and not share your password with others.

If you have reason to believe that your personal information is no longer secure, please contact us immediately using the contact information in the “How to Contact Us” section below.

## **Accessing and Updating Your Personal Information**

Note that you should submit written requests for accessing and updating your personal information to your branch where you do business.

We expect you to supply us with updates to your personal information, when required. We will not routinely update your personal information unless such a process is necessary.

You may make a request to review any personal information about you that we have collected, used, or disclosed, and we will provide you with any such personal information to the extent required by applicable laws.

You may also challenge the accuracy or completeness of your personal information in our records. If you demonstrate that your personal information in our records is inaccurate, incomplete or equivocal, we will amend or delete your personal information as required. Where appropriate, we will transmit the amended information to third parties to whom we have disclosed your personal information.

We may require that you provide sufficient identification to fulfill your request to access or correct your personal information. Any such identifying information will be used only for this purpose. We will not charge you any fees to access your personal information in our records without first providing you with an estimate of the approximate fees, if any.

If you object to how we handle your request, you may have the right to make a complaint to the Privacy Commissioner of Canada or the applicable provincial privacy commissioner.

If we are processing your personal information on behalf of our customer, we may refer your access or correction request to that customer.

## **Third-Party Websites and Services**

We may provide links to third-party websites for your convenience and information. We may also make opportunities available to you to purchase, subscribe to, or use other products or services from third parties with different privacy practices. Those other websites, products, or services are governed by the privacy statements and policies of the respective third party. This Privacy Policy does not extend to any websites, products, or services provided by third parties. We do not assume responsibility for the privacy practices of third parties and we encourage you to review all third-party privacy statements prior to using third-party websites, products, or services.

## **Changes to this Privacy Policy**

The Privacy Policy was last revised as of the date that appears at the top of this page.

From time to time, we may make changes to this Privacy Policy. When changes are made, they will become immediately effective when published in a revised Privacy Policy posted on our website, unless otherwise noted. We may also communicate the changes to this Privacy Policy by other means.

## How to Contact Us

All comments, questions, concerns, or requests regarding your personal information or our privacy practices should be forwarded to our Privacy Officer as follows:

Privacy Officer  
privacycompliance@bankofchina.ca  
1 (905) 771-6886 or 1-844-669-5566 (Toll Free) (Phone)  
1 (905) 771-8555 (Fax)  
50 Minthorn Blvd, Suite 600  
Markham, Ontario  
L3T 7X8