



# Our Privacy Policy

## At Desjardins Group, a cooperative financial group, your privacy is invaluable. That's why we take the protection and confidentiality of personal information you entrust us with very seriously.

Whether to serve you every day and provide you with products and services or meet our legal obligations, we need to collect, use and disclose certain personal information.

The information we collect is used to identify you, assess your eligibility for requested products and services, offer products and services that meet your expectations, help you take advantage of the benefits of being a Desjardins member or client, and manage the risks associated with our activities. We also use your information to comply with our legal obligations, which include the prevention of cyber threats, fraud and other financial crimes.

If you wish, you can allow us to use your information for other purposes, such as providing you with personalized offers and recommendations or inviting you to consultations to better understand your needs and expectations.

It's our responsibility to ensure that all information collected is handled securely. This is the basis of our Privacy Policy and how we apply it. The Privacy Policy (the "Policy") explains why we **collect** your personal information, how we **handle** it and how we **protect** it.

Our Privacy Policy is based on 4 key principles:

- Your **consent** to the collection, use and disclosure of your personal information by Desjardins Group
- Our commitment to collect only **necessary personal information**
- Our responsibility to protect the **security** and **confidentiality** of your personal information
- Our **transparency** regarding our practices and obligations in this regard

## Getting your consent

### What is my consent to the collection, use and disclosure of my information?

**By giving your consent, you authorize Desjardins Group to collect, use and disclose your personal information to serve you on a daily basis and meet its legal obligations.**

We collect, use and disclose only the personal information that is necessary, unless the law authorizes us to process it otherwise.

This consent to the collection, use and disclosure of your personal information takes precedence over any previous consent. It remains valid as long as you have a business relationship with a Desjardins Group component.

### Can I withdraw my consent to collect, use and disclose my personal information or refuse to provide certain information?

If you decide to **withdraw your consent** to the collection, use and disclosure of the personal information required to serve you on a daily basis and to meet our legal obligations, we'll provide you with all the information required to explain the impact of such a decision on our provision of products and services.

In some cases, withdrawing your consent is not an option because of legal or contractual requirements. Moreover, if you have authorized us to disclose your loan repayment habits to credit reporting agencies as part of a loan you have requested, you won't be able to withdraw this consent until you have fully repaid your loan.

You can **change your preferences** to receive personalized offers and recommendations or to participate in consultations at any time directly on AccèsD or by contacting your caisse or component you deal with at Desjardins Group.

If you **refuse to allow us to collect** certain personal information, we may not be able to provide you with the product or service requested and with certain benefits and discounts associated with that product or service.

For example, if you don't want us to consult your credit report when you apply for a credit product, such as a card, line of credit or loan, we may not be able to provide you with the requested product.

Also, if you wish to take advantage of a potential discount on your insurance premium, we'll ask for your consent to consult your credit report, if applicable. If you refuse, you may not be able to benefit from the discount.

## What other options do I have regarding my personal information?

Your information can also help us to serve you better. With your consent, we may use and disclose your information – within Desjardins Group only – to provide you with personalized offers and recommendations and to invite you to consultations to better understand your needs.

### Personalized offers and recommendations

With your consent, you'll receive personalized offers and recommendations based on your personal information and financial situation. This will allow us to offer you different products, services and advice that may be of interest to you and meet your needs.

### Consultations

Agreeing to participate in consultations gives you an opportunity to discuss topics that are relevant to your personal and financial situation. Your answers will contribute significantly to improving your Desjardins experience.

We may contact you with personalized offers and recommendations or invite you to participate in consultations, directly on AccèsD, on the Desjardins mobile services app, or by email, mail or phone.

**Have you changed your mind?** You can change your preferences at any time directly on AccèsD or by contacting your caisse or component you deal with at Desjardins Group. Please note that it may take up to 30 days to update your preferences.

## Collecting only what's necessary

### What personal information is being collected about me?

We've organized the personal information we collect into **9** categories.

A table defining these categories and providing examples of the information we collect can be found here.

Categories	Examples
1. Identification information	<ul style="list-style-type: none"><li>• First and last name</li><li>• Email and mailing addresses</li><li>• Telephone number</li><li>• Date of birth</li><li>• Gender or non-binary</li></ul>
2. Renseignements d'authentification	<ul style="list-style-type: none"><li>• Passwords and personal identification numbers (PINs)</li><li>• Answers to authentication questions</li><li>• Biometric information (fingerprint or voice print)</li><li>• Government identifiers (passport number, driver's licence number, etc.)</li></ul>
3. Information about your communications with us	<ul style="list-style-type: none"><li>• Summary of your appointments</li><li>• Log, history, recording<sup>1</sup> and summary of your communications with us</li><li>• Written communications by email or chat (including complaints and dissatisfactions where applicable)</li><li>• Responses to surveys and consultations</li><li>• Video recordings from security cameras at our locations</li></ul>
4. Information about how you use our websites and applications	<ul style="list-style-type: none"><li>• Information collected through cookies</li><li>• Browsing preferences (language, province, etc.)</li><li>• Clickstream data and browser history</li><li>• IP address</li><li>• Information about your device, operating system or browser</li></ul>

<sup>1</sup>Interactions that you have with us, such as telephone calls, may be recorded and monitored to ensure the quality of our service and the accuracy of your information and instructions. If you don't want your conversations recorded, you can notify us at the beginning of the call so we may offer an alternative solution. You can also use our online services for certain transactions.

<b>5. Information about your Desjardins products and services</b>	<ul style="list-style-type: none"> <li>• Information on balances and deposits</li> <li>• Information on your transactions and operations (accounts, contract numbers, dates and amounts, description, etc.)</li> <li>• Information on products held (type of product, date obtained, terms, payment methods, etc.)</li> <li>• Authorized account users</li> <li>• Insurance policy numbers</li> <li>• Insurance amount</li> <li>• Persons and property insured</li> <li>• Names of beneficiaries</li> </ul>
<b>6. Information about your financial situation</b>	<ul style="list-style-type: none"> <li>• Financial statement</li> <li>• Investor profile</li> <li>• Information about your job or source of income</li> <li>• Criminal record</li> <li>• Credit rating and report</li> </ul>
<b>7. Information on your insurance files</b>	<ul style="list-style-type: none"> <li>• Health check and lifestyle information</li> <li>• Insurance needs analysis</li> <li>• Claims history</li> <li>• Driving record</li> <li>• Insurance quotes and applications</li> <li>• Information collected for a claim</li> </ul>
<b>8. Information on communication choices and preferences</b>	<ul style="list-style-type: none"> <li>• Choices and preferences for how we communicate with you</li> <li>• Information on our loyalty initiatives (reward or discount programs)</li> </ul>
<b>9. Other information to enable Desjardins Group to comply with its legal obligations</b>	<ul style="list-style-type: none"> <li>• Proof of citizenship</li> <li>• Country of birth</li> <li>• Social insurance number (SIN)</li> <li>• Taxpayer identification number (TIN)</li> <li>• Residence and tax identification number</li> <li>• Results of our anti-money laundering, cybercrime, fraud and other audits</li> </ul>

## How is my personal information collected?

### We collect your personal information from 3 sources:

#### Directly from you

When you want to obtain a Desjardins Group product or service, or when you communicate with us, regardless of the method used – in person at one of our locations, by telephone, email or online chat – or when you complete a survey, we ask you to provide information about yourself.

The same goes if you contact us about our products and services; we need to identify you by asking you to answer authentication questions, for example.

This may include information required to open an account and become a Desjardins member, such as your first and last name and address, or more specific information like your medical results for a life insurance quote or your claims history for a property and casualty insurance quote.

We may also ask you to provide information about a third party, such as a driver for an auto insurance claim.

#### When using Desjardins Group products and services

We collect information about you when you browse our websites or use our online and mobile applications and services.

This information may be collected through cookies<sup>2</sup> or directly on our websites or applications. It may include information about your bank transfers, insurance claims and online investments.

See [How we collect, use and disclose information on Desjardins websites | Desjardins](#) for more details.

<sup>2</sup>A cookie is a text file or piece of data a website stores on your device when you visit a web page. It collects user information such as identifiers, details on your browser session and your preferences. The browser automatically saves the cookie on your device and keeps track of your information for the next time you log in.

## From other sources

Depending on the situation, we may need to collect information about you from other individuals, organizations or entities, such as:

- A person that you have a joint product or service with, for whom you're the guarantor (surety), or who is a guarantor (surety) for you
- Credit reporting agencies and other financial institutions
- Insurance databases

## Being transparent about our practices

### What does Desjardins group use my personal information for?

**We use your personal information to serve you every day and to meet our legal obligations.**

We'll inform you if we plan to use your personal information for any other purpose, unless we are legally authorized to use it otherwise.

**As such, before we can serve you and provide you with our products and services, we must:**

#### Identify you

- Confirm that we're providing products and services to the right person by verifying that you are who you say you are (identify you and validate your identity)
- Ensure that your personal information is still accurate, complete and up to date before we use it; however, it is your responsibility to inform us of any changes
- Respect your choices regarding your personal information, namely, provide you with personalized offers and recommendations and invite you to consultations if you have given us your consent to do so

#### Assess your eligibility for requested products and services

- Review your financial situation
- Reassess your financial obligations to us
- Review your insurance quotes and applications
- Evaluate whether the product or service requested meets your needs and goals, if necessary
- Review and update your file or credit rating to assess our risks

#### Offer products and services that meet your expectations

- Provide you with the product or service you requested
- Guide, advise and help you make the best decisions based on your expressed need, situation and goals
- Design statistical models<sup>3</sup> to deliver products, services and advice that meet your needs
- Manage your current products and services
- Process your insurance claims
- Contact you<sup>4</sup>
- Get your opinion after an interaction with Desjardins Group or about a product or service

- Vehicle and claims history
- Service providers
- Public bodies
- Personal referrals
- Public sources such as registries, official documents and websites
- Other relevant sources to provide you with the requested product or service

- Provide you with guidance and support, respond to your requests for information and refer you to the right person based on your request
- Handle complaints and dissatisfaction

### Help you take advantage of the benefits of being a member or client of Desjardins Group

- Offer you discounts, cashback and special rates or fees, depending on the products and services you have with us
- Calculate and pay out your member dividend as a Desjardins caisse member based on the products and services you have with us

### Manage the risks associated with our activities

- Assess and monitor the performance of our products and services, price them, improve them, and create new ones
- Develop, maintain and improve internal audit systems, processes, methods, practices and procedures
- Design and build dashboards, indicators and other types of reports
- Find, identify and assess risks to continuously improve our products and services
- Design statistical models<sup>3</sup> to monitor operations and ensure the security of your information.

### We must also use your personal information to meet our legal obligations to:

#### Prevent cyber threats, fraud and other financial crimes

The term "other financial crimes" includes money laundering, terrorist financing and tax evasion, among others.

- Protect your assets
- Rapidly detect and prevent cyber threats, fraud, and other financial crimes
- Design statistical models<sup>3</sup> to facilitate detection and prevention
- Take corrective actions as required
- Keep relevant regulatory documents
- Report or flag specific transactions
- Investigate or facilitate investigations when required
- Cooperate with and inform the proper authorities when required
- Confirm the identity of members and clients using our products or services, for example, to:
  - Identify you

<sup>3</sup> The information used to design statistical models is de-identified, so you cannot be identified.

<sup>4</sup> We may contact you about your products and services directly on AccèsD or by email, mail or telephone.

- Validate the information you provided about yourself, your citizenship and nationality, your job title or function, and your employer
- Confirm your source of income
- Confirm the use of some of your products

### **Respond to information requests, warrants and orders from courts and other organizations**

- Protect your rights and interests as well as our own
- Cooperate with legal proceedings or administrative investigations
- Work with any organization with the authority to prevent, detect or punish crime and violations of the law
- Respond to requests, warrants and orders from organizations with the authority to compel us to disclose your information

### **Comply with tax requirements**

- Produce your tax statements when you hold a Desjardins Group product or service that pays interest or investment income or requires tax treatment, such as for high-interest accounts, mutual funds or registered retirement savings plans (RRSPs)
- Comply with the *Common Reporting Standard* (CRS), which requires us to report accounts held by individuals, non-resident entities or certain entities controlled by non-resident individuals
- Comply with the US *Foreign Account Tax Compliance Act* (FATCA), which requires us to report accounts held by US citizens to the US government

### **Who has access to my personal information at Desjardins Group?**

**Access to your information is limited to Desjardins Group employees and consultants as well as Desjardins agents and representatives who need to access it to perform their duties.**

Our employees and consultants commit annually to protect the confidentiality of the personal information they need while performing their duties and must regularly take security and privacy training.

### **Who can my personal information be disclosed to?**

**Our commitment is clear: We will never sell your personal information to anyone.**

However, we may need to disclose your personal information to third parties in the normal course of business.

### **Desjardins Group components**

Desjardins Group components disclose the personal information they need to serve you on a daily basis and to meet their legal obligations. For example, caisses disclose information about you to be able to offer products and services that meet your expectations.

Desjardins Group components also disclose certain personal information to identify you more quickly, to disclose information to provide you with personalized offers and recommendations, or to ask you to participate in consultations about our products and services, but only if you gave your consent.

At Desjardins Insurance, in order to provide with products and services that meet your expectations, additional information about your communications, products and services is disclosed to the components offering insurance and doing business under the

"Desjardins Insurance" brand – with the exception of Certas, a home and auto insurance company – or among subsidiaries doing business under "The Personal" brand.

Lastly, in accordance with Ontario's legal requirements, Desjardins Ontario Credit Union does not disclose any of your personal information to Desjardins General Insurance Group and its subsidiaries, or to Desjardins Financial Security and Desjardins Trust Inc.

### **Courts, authorities and other agencies**

Certain situations require us to disclose your personal information to courts, law enforcement authorities and other agencies.

This may be necessary to prevent cyber threats, fraud and other financial crimes, to respond to requests, warrants and orders or to meet our insurance obligations.

### **Other entities**

From time to time, we may need to disclose some of your personal information with third parties, such as other financial institutions, credit reporting agencies, public and private fraud and claims databases, and lending institutions.

Similarly, we may need to disclose some of your personal information to other people or ask them for information about you, for example, if you have a joint product or service with another person, if a third party is a guarantor (surety) for one of your obligations to us, or if you're a guarantor (surety) for another person.

### **Suppliers and partners**

We may disclose information about you to suppliers and partners.

- Insurance providers, claims advisors and health consultants
- Bank card printing or manufacturing companies
- Information technology services and products companies
- Client consulting firms mandated by Desjardins
- Cloud, web-hosting and data-processing services
- Creative and promotional agencies
- Legal services
- Credit reporting or collection agencies
- Human resources management and training companies

These partners and suppliers must contractually agree to comply with and abide by our strict standards for the protection and confidentiality of your personal information as set forth in this Privacy Policy.

We entrust only our suppliers and partners with the personal information they need to perform their duties, functions and contractual obligations with Desjardins Group.

In addition to being subject to confidentiality obligations, the employees of suppliers who have access to personal information must also fully comply with our contractual requirements. Lastly, Desjardins Group suppliers and partners must apply adequate physical, information technology and administrative security measures.

We'll inform you if a new need arises, unless we're authorized by law to disclose it without your consent. In any case, we ensure the protection and confidentiality of the information we disclose



## Protecting the security and confidentiality of your information

### Is my personal information secure?

We apply the necessary security measures rigorously to ensure the protection of your personal information.

These measures may consist of:

#### Physical security measures

- Surveillance cameras
- Security guards
- Office access cards
- Locking filing cabinets
- Any other security measures required to limit access to authorized persons

#### Technological security measures

- Password
- Data encryption
- Access management system
- Monitoring and control to detect suspicious activity
- Any other security measures required to limit access to authorized persons

#### Administrative security measures

- Access to your personal information limited to employees, consultants, Desjardins agents and representatives who need it to perform their duties
- Adherence to the Code of Professional Conduct and annual certification required of all our employees and consultants, with strict rules governing the protection of personal information
- Regular training and education of employees, consultants, agents and representatives on the Code of Professional Conduct, policies, practices and procedures on security and privacy
- Policies and procedures for monitoring, investigating and updating security systems and measures
- Ongoing monitoring and control to detect suspicious activity and potential deviations from organizational directives and policies

Visit our [Security](#) page for more information on these security measures.

### Where is my personal information stored?

Your information is usually stored in Canada, but we may use suppliers or partners located outside of the country.

If we need to disclose personal information with these suppliers and partners, Desjardins Group will ensure the protection and confidentiality of this information meets its own requirements and will ask these suppliers and partners to contractually agree to comply with and respect these requirements.

In all cases, we'll ensure the protection and confidentiality of your information.

### How is my information stored?

We store your personal information in a secure and confidential manner for as long as it's required for us to meet our legal obligations.

For example, in Canada, we're subject to laws and regulations that stipulate minimum retention periods. The retention periods must take into account the exhaustion of potential remedies and limitation periods applicable in Canada. These retention periods vary depending on the situation. Therefore, we may retain your personal information after your relationship with us has ended.

### When and how is information disposed of?

Once the retention period has expired, we ensure that your personal information is safely disposed of or de-identified. While deletion is a final and irreversible disposal process, de-identification means that your personal information is altered so that it can no longer directly or indirectly identify you.

Deletion and de-identification are carried out in a safe and secure manner, in accordance with applicable best practices.



## Respecting your rights when it comes to your information

### Can I access, correct or update my personal information?

**Yes, you can access your personal information at any time.**

To do so, you must submit a written request to your caisse or component you deal with at Desjardins Group.

Your request must be detailed enough to allow us to identify the documents or other media containing the personal information you wish to access.

We may need to validate your identity and the reason for your request.

We'll inform you if there are any fees for processing your request. These fees, if any, are reasonable and are usually limited to the cost

of transcription, reproduction or transmission. In such cases, we'll ask for your permission before proceeding.

**Yes, you can correct inaccurate and incomplete personal information we have about you.**

Contact your caisse or component you deal with at Desjardins Group if you wish to correct any inaccurate or incomplete information we have about you.

### Yes, you can update the personal information we have about you.

If you wish to update the information we have about you – for example, after a change in your personal situation or a change of address – you're responsible for contacting your caisse or component you deal with at Desjardins Group to update it.

### What can I do if I have questions or if I'm not satisfied with the handling of my personal information?

If you have a question, concern or complaint about the processing of your personal information, you can:

**1. First, contact us.**

Talk to a caisse advisor or a customer service employee to ensure that your complaint or concern is addressed in a timely manner. You can also call us at 1-800-CAISSES (1-800-224-7737).

**2. If you're not satisfied with the response you received, you may contact the Desjardins Group Chief Privacy Officer:**

### By mail

Office of the Chief Privacy Officer  
100 Rue des Commandeurs  
LEV-100-6e  
Lévis, Quebec G6V 7N5

### By email

[cpo@desjardins.com](mailto:cpo@desjardins.com)

You must provide your name and contact information, the nature of your request, the name of the department or person you have already contacted and any relevant information.

If you wish, you may also contact the appropriate provincial or federal privacy commissioner.

## Understanding our policy

### Who is the privacy policy for?

Any member or client of Desjardins Group, any person who communicates with us, regardless of the means used, and any individual whose personal information we collect in the course of our operations

### What does it apply to?

The Privacy Policy applies to the personal information we collect and hold about you, which includes any information about you or your business relationship with Desjardins Group that allows us to identify you. It also includes information collected from you on our behalf by a Desjardins agent or representative.

In addition, it applies to all products and services offered by any component<sup>5</sup> of Desjardins Group across Canada for which we collect personal information.

We collect, use, disclose and protect your personal information in accordance with Canada's privacy laws

### Can your privacy policy change and, if so, will I be notified?

From time to time, we may make certain changes to our Privacy Policy. If we do, we'll post a notice on our website.

Be sure to check the Privacy Policy periodically for any updates. Changes are effective as of the date indicated on the Privacy Policy.



<sup>5</sup> The components covered include those mentioned on [Desjardins Group structure | Desjardins](#) excluding the following: Desjardins Bank, Desjardins Florida Branch, Capital Desjardins, Développement international Desjardins, Desjardins Foundation, Desjardins Security Fund, Alphonse Desjardins Historical Society, Capital régional et coopératif Desjardins, Desjardins Capital and Desjardins Property Management.