

# Privacy Policy

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## Protection of Personal Information

Heritage Savings & Credit Union Inc. is committed to ensuring and protecting the privacy and the personal information of the members of this credit union. A privacy policy and procedures are maintained to ensure the confidential handling of members' personal information. In this regard, Heritage Savings & Credit Union Inc. has adopted *the Code for the Protection of Personal Information* (the Code). The requirements of the Code establish Heritage Savings & Credit Union Inc.'s operational use of personal information as well as use of employee information.

The following ten interrelated privacy principles are specified in the *Personal Information Protection and Electronic Documents Act*, and form the basis of the Code:

- **Accountability** – Heritage Savings & Credit Union Inc. is responsible for personal information under its control and shall designate a Privacy Officer who is accountable for Heritage Savings & Credit Union Inc.'s compliance with the principles of the Code.
- **Identifying Purposes** – The purposes for which personal information is collected shall be identified by Heritage Savings & Credit Union Inc. at or before the time the information is collected.
- **Consent** – The knowledge and consent of the member are required for the collection, use and disclosure of personal information, except in specific circumstances as described within this Code.
- **Limiting Collection** – The collection of personal information shall be limited to that which is necessary for the purposes identified by Heritage Savings & Credit Union Inc. Information shall be collected by fair and lawful means.
- **Limiting Use, Disclosure and Retention** – Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the member or as required by law. Personal information shall be retained only as long as necessary for the fulfilment of those purposes.
- **Accuracy** – Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.
- **Safeguards** – Personal information shall be protected by security safeguards appropriate to the sensitivity of the information. Heritage Savings & Credit Union Inc. will apply the same standard of care as it applies to safeguard its own confidential information of a similar nature.
- **Openness** – Heritage Savings & Credit Union Inc. shall make specific, understandable information about its policies and practices relating to the management of personal information readily available to members.
- **Individual Access** – Upon request, a member shall be informed of the existence, use, and disclosure of their personal information, and shall be given access to that information. A



member is entitled to question the accuracy and completeness of the information and have it amended as appropriate on proof of inaccuracy.

- **Challenging Compliance** – A member shall be able to question compliance with the above principles to the Privacy Officer accountable for Heritage Savings & Credit Union Inc.'s compliance. Heritage Savings & Credit Union Inc. shall have policies and procedures to respond to the member's questions and concerns.

## **Accountability**

The Board of Directors of Heritage Savings & Credit Union Inc. is accountable for credit union compliance with the Code, and the creation and review of all Board policies specific to the Code and the designation of a credit union Privacy Officer.

### ***Privacy Officer***

The Board of Directors, in consultation with the Chief Executive Officer (CEO), will designate a Privacy Officer, who has primary day-to-day responsibility for compliance with the Code. The Board of Directors will notify all employees, and any affected third parties, in writing of the appointment.

## **Board Reporting and Notification**

### **Quarterly Reporting**

The Privacy Officer will continually review compliance within Heritage Savings & Credit Union Inc. and its third party suppliers, and will report to the CEO (for presentation to the Board) any matters concerning non-compliance with Heritage Savings & Credit Union Inc.'s Code principles, policies or procedures that are likely to require input from the Board (e.g., any matter that could result in an investigation or audit by the Office of the Privacy Commissioner).

The Privacy Officer will prepare a Quarterly Report for the CEO for presentation to the Board that identifies key activities (e.g., a review of third party contracts, training initiatives, review of policies and procedures) and recommended changes for Board consideration. The report should also include an overview of the number of enquiries, number of access requests, and details regarding challenges to compliance.

The Board will review the steps taken to address any deficiencies or weakness in compliance.

### **Annual Reporting**

The Privacy Officer will prepare an annual review of the effectiveness of the board policies to ensure compliance with the Code and to recommend any revisions as deemed appropriate. This report is due within four months of the end of each fiscal year.



## Identifying Purposes

### *Approval and Documentation of Purposes of Personal Information*

The Privacy Officer will document all purposes, including existing and new purposes, for which personal information is collected, used or disclosed. All new purposes must be approved by the Privacy Officer prior to collection of information for the new purpose.

If the proposed purpose is significantly different than existing purposes or involves a new disclosure to a third party, the proposed purpose must be approved by the Board of Directors prior to implementation.

### *Member Disclosure*

Heritage Savings & Credit Union Inc. will make reasonable efforts to ensure that members are aware of the purpose for which their personal information is collected, including any disclosure of their personal information to third parties. The primary communication method will be the use of written or electronic statements on applications, forms, contracts and agreements.

### *Employee Disclosure*

Heritage Savings & Credit Union Inc. will ensure that all employees are aware of the purposes for which employee information is collected, including any disclosure of their personal information to third parties. This will be communicated verbally and in writing at the commencement of employment.

## Consent

Once member consent is obtained, further member consent will not be required when personal information is supplied to agents of Heritage Savings & Credit Union Inc. who carry out functions such as data processing, credit bureaus, cheque printing and cheque processing.

Heritage Savings & Credit Union Inc. Privacy Officer must authorize all instances where a member's information is collected, used or disclosed without the member's knowledge and consent.

### *Obtaining Consent*

Express consent in writing, through the use of applications, signed forms and contracts, will be used for obtaining consent for the collection, use or disclosure of personal information.



Implied consent will be used for marketing purposes or to disclose nominative information to an affiliated organization. Implied consent must never contravene the “Act”.

The Privacy Officer must review and approve all methods of obtaining consent.

### ***Limits on Consent to Information Collection***

Heritage Savings & Credit Union Inc. will not, as a condition of the supply of a product or service, require a member to consent to the collection, use, or disclosure of information beyond that required to fulfill explicitly specified and legitimate purposes.

Where additional, non-essential information for a product or service is sought from members, this will be identified as *optional* information, collected only at the discretion of the member.

Refusal to provide this optional information will not influence the member’s consideration for a product or service.

The Privacy Officer will review the personal information requirements of all products or services to ensure that only information required for legitimate purposes is collected and used.

### ***Withdrawing Consent***

Heritage Savings & Credit Union Inc. will obtain a written request (signed and dated) from a member who seeks to withdraw consent. The written request must acknowledge that the member has been advised that Heritage Savings & Credit Union Inc. may subsequently not be able to provide the member with a related product, service or information that could be of value to the member.

The withdrawal of consent is subject to any legal or contractual restrictions that Heritage Savings & Credit Union Inc. may have with the member or other organizations such as: the Income Tax Act; credit reporting; or to fulfill other fiduciary and legal responsibilities.

### **Limiting Collection**

Heritage Savings & Credit Union Inc. will not collect personal information indiscriminately. It will specify both the amount and the type of information collected, limited to that which is necessary to fulfill the purposes identified, in accordance with these policies.



## Limiting Use, Disclosure and Retention

### *Safeguard Standards*

Heritage Savings & Credit Union Inc. will protect the interests of its members by taking reasonable steps to ensure that:

- orders or demands comply with the laws under which they were issued
- only personal information that is legally required is disclosed
- casual requests for personal information are denied
- all information disclosed to third parties receives the same standards of care as within Heritage Savings & Credit Union Inc. (see Protection of Member Information with Third Parties).

Heritage Savings & Credit Union Inc. will make reasonable attempts to notify the member that an order has been received, if not contrary to the security of Heritage Savings & Credit Union Inc. and if the law allows. Notification may be by telephone, or by letter to the member's usual address.

### *Retention & Destruction of Personal Information*

The Privacy Officer will ensure that guidelines and procedures with respect to the retention of personal information are maintained within Heritage Savings & Credit Union Inc. These guidelines will include minimum and maximum retention periods and will conform to any legislative requirements. The Privacy Officer will ensure that Heritage Savings & Credit Union Inc. has guidelines and procedures governing the destruction of personal information. Refer to Board & Management Responsibilities, Chapter 7 for policies, and *General Administration*, "Records Management" for procedures.

## Accuracy

The Privacy Officer will ensure Heritage Savings & Credit Union Inc. has guidelines and procedures to ensure member and employee data is as accurate, complete and current as necessary. Heritage Savings & Credit Union Inc. will not routinely update personal information, unless such a process is necessary to fulfill the purposes for which the information was collected.

## Safeguards

### *Credit Union Safeguards*

Credit union security safeguards will protect personal information against loss or theft, as well as unauthorized access, use, copying, modification, disclosure or



disposal. Heritage Savings & Credit Union Inc. will protect personal information regardless of the format in which it is held.

The Privacy Officer will:

- collaborate with third parties specializing in security safeguards, as required, to ensure the required level of protection
- conduct regular reviews of organizational and employee practices related to the safeguarding of personal information
- periodically remind employees, officers and directors of the importance of maintaining the security and confidentiality of personal information.

Employees, officers and directors are individually required to sign a Statement of Ethical Conduct annually. The statement must include a commitment to keep members' personal information secure and strictly confidential.

### ***Destruction of Personal Information Safeguards***

Heritage Savings & Credit Union Inc. will dispose of personal information in a secure manner to prevent any unauthorized access. The Privacy Officer will periodically review the disposal and destruction methods used by credit union employees.

### **Openness**

Heritage Savings & Credit Union Inc. will make specific and understandable information about its policies and procedures relating to the management of personal information readily available to members.

This information will include:

- the name or title and address of the Privacy Officer to whom complaints or inquiries can be directed
- the means of gaining access to personal information held by Heritage Savings & Credit Union Inc.
- a description of the type of personal information held at Heritage Savings & Credit Union Inc., including a general account of its use
- types of personal information made available to related organizations such as subsidiaries or third party suppliers of services.

The Privacy Officer will review the methods of dissemination, and the form in which the information is presented to ensure that it is easy to locate, understandable and accessible.





## **Individual Access**

All requests for access to personal information must be submitted in writing and include adequate proof of the individual's identity and right to access, and sufficient information to allow Heritage Savings & Credit Union Inc. to locate the requested information.

### ***Restricting Access***

Exceptions to the access requirement will be limited and specific and include the following:

- providing access would reveal personal information about a third party
- information protected by solicitor-client privilege
- providing access would reveal confidential commercial information
- providing access might threaten the life or security of another individual
- information generated in the course of a formal dispute resolution process
- personal information to which the member has requested access has been requested by a government institution for law enforcement, or an investigation related to law enforcement
- information collected without knowledge or consent for purposes related to investigating a breach of an agreement or a contravention of Ontario or Canadian law.

The Privacy Officer must be made aware of any situations involving employees, members or other individuals that would result in legal restrictions on access.

### ***Treatment of Opinions and Judgments***

Heritage Savings & Credit Union Inc. cannot withhold from a member any opinions and judgments formed about the member in determining their eligibility for any products and services. Heritage Savings & Credit Union Inc. will provide a member, on written request, access to all information that may have been used in making a determination about a member's eligibility for a service, other than in the specific restrictions mentioned above.

### ***Response Time***

Heritage Savings & Credit Union Inc. will respond to a member's request for information within 30 days. This timeframe can be expanded, but only if required, and on written notification to the member.

### ***Cost of Response***

At the Privacy Officer's discretion, Heritage Savings & Credit Union Inc. may impose a fee at a stated and reasonable hourly rate where collection of the requested





information requires exceptional time and effort. The member must be informed of, and agree to, an estimate of costs prior to the commencement of the request.

### **Challenging Compliance**

Any individual, not just a member or a credit union employee, can challenge Heritage Savings & Credit Union Inc.'s compliance with any of the Code principles. The Privacy Officer will investigate all complaints.

### ***Inquiry & Complaint Handling Process***

The Privacy Officer will maintain documented procedures for responding to all questions or concerns.

Inquiries and complaints must be in writing, with a formal process in place to receive and track them. Heritage Savings & Credit Union Inc. must respond as quickly as possible within 30 days.

### ***Required Measures for Justified Complaints***

The Privacy Officer is responsible for ensuring appropriate measures are taken when a complaint is found to be justified. These measures will include:

- written response to the complainant within 30 days
- revision of the challenged personal information
- revision to policies and procedures, if required
- review of any complaint that requires disciplinary action against a credit union employee with the appropriate manager
- reporting non-compliance to the Board of Directors, including the actions proposed or taken to resolve the issue.

### **Protection of Member Information with Third Parties**

#### ***Third Party Accountability***

Heritage Savings & Credit Union Inc. will use contractual or other means to provide a comparable level of protection while the information is being processed by a third party.

Personal information disclosed to unrelated third party suppliers is strictly limited to programs endorsed by Heritage Savings & Credit Union Inc.. The Privacy Officer must be satisfied that the personal information is adequately safeguarded by the third party.



### ***Third Party Agents/Suppliers Safeguards***

Third party agents or suppliers will be required to safeguard personal information disclosed to them in a manner consistent with the policies of Heritage Savings & Credit Union Inc. Examples include data processors, credit bureaus, cheque printers, and cheque processors.

Heritage Savings & Credit Union Inc. will not enter into any commercial relationships with organizations that do not agree to abide by acceptable limitations on information uses and appropriate safeguards.



## Designed with privacy in mind

Our mobile financial services rely on high-security mechanisms to protect your privacy and financial information from login to logout. Transactions are processed behind our firewalls, 128-bit encryption is used throughout and user identity is verified through multiple factors. We've also designed our interfaces keeping in mind that you use your device in public places. Your account numbers are never displayed, account nicknames are available and sessions are automatically timed-out.

### At a Glance

Follow safe mobile practices — so you're ready if anything should happen

### Your collaboration matters

To benefit from our mobile security, you must respect the terms of our customer agreements. In particular:

- Don't share or divulge your *Heritage Savings & Credit Union Inc.* account number, security code or your mobile password – including never writing this information down, never allowing your family or friends access to this information and never storing any of this information in a lockbox or wallet utility on your mobile device.
- Notify us immediately in the event of loss, theft, misuse or compromise of your *Heritage Savings & Credit Union Inc.* account number, mobile password or mobile device at (519) 351-0600
- Do not download our mobile financial services app from any site other than the device operating system App Store.
- Install mobile anti-virus/anti-malware if such security measures are available for your mobile Device.
- Never respond to pop-ups, emails or SMS requests that ask you to give personal information about yourself or your Heritage accounts. We will not send you unsolicited emails or SMS messages asking for your mobile password, Heritage Personal Identification Number (PIN), credit card or account numbers, etc.
- Review your account statements in a timely manner
- Get more tips on how to [protect your internet connection](#).

### Protection starts with a little prevention. Keep what's yours to yourself

Prevent unauthorized access: Use a passcode to unlock your phone's screen. It's easy to do. Just check your user manual for instructions. Or you can search for a copy of your user's guide on your wireless carrier's website.



**If it's too good to be true, beware**

Provisioning: Our mobile services are provisioned by firewall-protected servers or Apple's App store. If we make updates to our services, you will be notified when you launch our iPhone app. We will never send you a text message asking you to download an update or a promotional app by clicking an enclosed link.

Not all apps are equal: Make sure you know and trust the creator of an app before downloading it to your mobile device. Some free utilities such as wallpapers, calendars and aggregation services have been known to install malware.

**Investigate remote lookup and wipe-up services**

There are GPS utilities for most smartphones that will let you lock your phone at a distance, locate it, wipe its contents and even post messages on its screen so finders can easily return it to you.

You can find out more by contacting your carrier.

**Do you have mobile security questions?**

Our mobile financial services are safe, secure – and help you monitor your own accounts effectively by giving you access to your balance and transaction information anywhere, anytime you need to know. If you have any questions, please call us at (519) 351-0600.

