

# **PRIVACY POLICY**

All Canadian Mortgage Corporation (ACMC) is committed to protecting the privacy and security of customer personal information. This policy explains the types of personal information we collect, how it is used, and the steps we take to ensure customer personal information is handled appropriately.

Our policies and practices have been designed to comply with the federal Personal Information Protection and Electronic Documents Act (PIPEDA) or corresponding provincial privacy acts, as applicable (collectively “Privacy Laws”).

## **What is Personal Information?**

Personal Information is any information about an identifiable individual including unrecorded information or information recorded in any form. Personal information includes such things as residential address, age, income, date of birth, ethnic origin, medical history, credit history, payment records and credit card number. The following types of information about individuals is not considered personal information:

- Business contact information (e.g. business phone and fax number, address and e-mail)
- Public telephone directory information, where the subscriber can refuse to be listed
- Professional and business directories available to the public
- Certain public registries and court records.
- Certain other publicly available printed and electronic publications

## **Our Privacy Principles:**

### **1. Accountability**

All Canadian Mortgage Corporation is responsible for all personal information in its possession or control, including any personal information that is provided to us by our agents or transferred to third parties for processing, storage or other purposes. We have a designated Privacy Officer who is accountable for compliance with this policy.

### **2. Use of Information**

In most situations, the reason why we are collecting personal information and its use is obvious from the context. In other situations, ACMC identifies the purpose for which your personal information is collected and its use. We do this explicitly or by implication where the purpose of using such information is reasonably apparent to you by virtue of its nature or the context in which it is being collected.

### 3. **Consent**

ACMC obtains your consent to collect, use or disclose personal information. The method of obtaining consent will be appropriate to the type of personal information being collected, used or disclosed.

ACMC will obtain your express consent (verbal, written or electronic agreement) to collect, use or disclose sensitive personal information such as medical data or personal financial information.

ACMC will rely on implied consent to collect, use or disclose your personal information where one or more of the following apply:

- A customer relationship already exists
- Express consent has previously been given for the same or similar use of the personal information
- Where the intended use of the information is reasonably obvious from the context in which it is obtained and you provide the information voluntarily/

In some circumstances permitted by Privacy Laws, we will collect, use and disclose your personal information without your consent, including situations of urgency when it is impractical to obtain your consent, when ACMC or its affiliates need to collect monies or in connection with an investigation or proceeding by ACMC or a law enforcement agency.

You can change your consent to any collection, use or disclosure of your personal information at any time on reasonable written notice, subject to permitted or required exceptions under Privacy Laws (e.g. where withdrawal of consent would frustrate a legal obligation such as collecting on a loan). In many situations, withdrawal of consent may also deprive you of a benefit or service. To change your consent to collection, use or disclosure of personal information about you; refer to the “How to Contact Us” section below.

### 4. **Collection of Information**

ACMC collects personal information required to provide our products and services, including collections. We will collect personal information only by reasonable and lawful means. Examples of why we collect personal information include:

- Communicating with you about your loans, securities or deposits.
- Accepting deposits
- Considering applications for credit
- Processing and keeping track of transactions and reporting back to you
- Protecting against theft, fraud and error
- Analysis of information to determine that relevant services are offered to those who may need them
- Providing products and services requested by you

- Advising you of products and services that ACMC believes will be of interest to you and provide value to you
- To monitor security
- To comply with legal and governmental requirements.

#### **5. Limited Use of Information**

ACMC uses and discloses your personal information only for the purposes for which it was collected unless permitted by Privacy Laws. ACMC does not sell or rent personal information to any organization or person for any reason.

We disclose personal information to third part organizations to assist in providing customers with services or to obtain services to assist us in our business. If your personal information is shared with third parties, ACMC will require them to comply with this policy when dealing with your personal information.

ACMC retains your personal information only as long as it is required for our business relationship or as required by applicable laws.

#### **6. Keeping Information Current & Accurate**

ACMC endeavours to keep your personal information up to date, accurate and relevant for its intended use. You can assist us by updating your personal information (e.g. change of address) with us.

#### **7. The security of your personal information is a priority for ACMC**

We take steps to safeguard your personal information, regardless of the format in which it is held, including:

- Physical security measures such as restricted access facilities and locked filing cabinets
- Shredding of documents containing personal information
- Electronic security measures for computerized personal information such as password protection
- Organizational processes such as limiting access to your personal information to a selected group of individuals
- Requiring third parties given access to your personal information to protect and secure your personal information.

#### **8. Access to Information**

You can request access to your personal information kept by ACMC. Customers who wish to contact us should refer to the “How to contact us” section below. You may request any of the following:

- What types of personal information we have on record or in our control, how it is used and to whom it may have been disclosed
- Reasonable access to your personal information so you can review and verify its accuracy and completeness and request changes to the information. ACMC reserves the right to decline to make a requested correction but will append a notation to the record of your requested alternative information
- Updates to your personal information

Subject to applicable exceptions under Privacy Laws, such as where:

- Your request would divulge confidential competitive business information of ACMC
- The information is not readily retrievable and the burden or cost of providing access is disproportionate to the nature of the request
- Access could interfere with or prejudice an investigation or proceeding by ACMC or law enforcement agencies.

## 9. **Protect Your Information**

In addition to the steps we take to safeguard your personal information, we believe there are measures you should take to protect yourself as well.

We advise you to not share any personal or financial information with others unless you clearly understand the purpose of the requesting the information and that you have confirmed you are dealing with a legitimate contact. We also recommend that you not share any significant personal or financial information via email or Voicemail.

## 10. **Contact Us**

If you are uncomfortable about any information or requests you receive from ACMC via phone, fax or email, please contact us to confirm the information or request is legitimate or to discuss the concern with us.

You may also contact us:

- By calling (604) 664-7088
- By e-mailing: [quan@allcanadianmtg.ca](mailto:quan@allcanadianmtg.ca)
- By mail to:  
Attention: P. Quan  
All Canadian Mortgage Corporation  
#701 – 1030 West Georgia Street  
Vancouver, BC, V6E 2Y3

If your questions, concerns and complaints have not been resolved to your satisfaction, you may also complain to the Privacy Commissioner within your jurisdiction, where applicable.