

PRIVACY POLICY

ADR Chambers Banking Ombuds Office

About ADRBO

ADR Chambers Banking Ombuds Office (“ADRBO”) reviews complaints brought by customers of participating banks after the customers have exhausted the bank's internal complaint system and are not satisfied with the outcome. If a complaint falls within ADRBO's mandate and a full investigation is warranted, an investigation is undertaken by one of ADRBO's experienced and independent investigators. Upon the conclusion of an investigation, an investigator may make non-binding recommendations to the bank and complainant, which may include a recommendation for financial compensation.

ADRBO is a private company that operates independently from the participating banks. The role of ADRBO is to provide an accessible and independent dispute resolution service to the Complainant and the Member Bank. ADRBO's service is free of charge to those making the complaint.

ADRBO is regulated by the Financial Consumer Agency of Canada and is governed by the *Bank Act*. ADRBO is subject to the *Complaints (Banks, Authorized Foreign Banks and External Complaints Bodies) Regulations*.

Privacy at ADRBO

ADRBO collects personal information from Complainants¹ and Member Banks² for the purpose of resolving disputes. ADRBO is committed to ensuring that the personal information of our clients remains confidential and secure. This Privacy Policy (“Policy”) describes the ways ADRBO is committed to ensuring that all private and confidential information is protected for both the Complainant and the Member Bank. This Policy is intended to ensure that the privacy of individuals is protected in the use, collection, disclosure, and storage of personal and/or confidential information by ADRBO. This Policy complies with and supplements the guidelines and mandates of Canada's federal private sector privacy law, the *Personal Information Protection and Electronic Documents Act*.

ADRBO will manage personal information in an open and transparent way. This Policy will be available to anyone free of charge.

ADRBO Commitment

¹ Includes any small business or individual customer of a Member Bank who is making a complaint to ADRBO.

² Means a financial services provider that uses the services of ADRBO.

ADRBO is committed to keeping all personal information private and confidential. With written consent, we will collect personal information from the Member Bank and the Complainant in order to investigate the complaint. Any and all information collected from the Member Bank and the Complainant will only be used for the purpose of determining the proper resolution and/or recommendations. ADRBO is committed to protecting the security of the files it maintains and there are security measures implemented in order to maintain the security.

Information Collected

While the personal information that ADRBO collects depends on the nature of the complaint, the personal information may include your birth date, home address, telephone number and information about finances and health, and any and all personal and identifiable information that is obtained by the financial services provider about the Complainant.³ We collect personal information from the Complainant, the Member Bank, and others as necessary, to facilitate the investigation and resolution of a complaint. We will limit the amount and type of personal information we collect by ensuring we only collect such information that is reasonably necessary and directly related with the complaint in dispute. All personal information will be collected by lawful and fair means.

Accountability

ADRBO is accountable for all personal information in its possession or control. Policies and procedures have been established to comply with this Policy.

Consent Required

We will not collect, use, or disclose any personal information without first obtaining consent, except where required or permitted by law. Consent may be withdrawn at any time. Further assistance in resolving the complaint may not be available if consent is withdrawn.

Use of Personal Information

ADRBO will only use or disclose your personal information for the intended and identified purposes and reasons for which the information was collected, except where required and permitted by law. ADRBO will take any and such reasonable steps as necessary to ensure that the personal information collected is accurate, complete, relevant, and up to date. We will inform individuals of the purpose for which personal information will be used before or when they consent to its collection.

Access to Personal Information

³ This list is not exhaustive.

A person may access their personal information held by ADRBO that has been provided to us and is in our possession. Parties should contact their financial services provider directly to access their personal information provided to us by that Member Bank in the course of our dispute resolution process.

Website

Our online website (<http://www.bankingombuds.ca>) is hosted on servers that are owned and managed by a third party. Our website uses cookies to enhance the user experience for our clients.

Security

ADRBO has taken the proper and necessary steps to ensure all information pertaining to our clients' files is secured and protected against theft, unauthorized use, modification, and loss. Security-protected databases are used to store online files, and specific security measures are used to ensure the files are monitored.

All information travelling between our clients' browser and our website is protected from eavesdroppers with 256-bit SSL encryption. The lock icon in the browser allows them to verify that they are not visiting a phishing site and that their data is secure in transit.

Breach of Privacy

A complaint about a breach of privacy must be in writing, and directed to ADRBO. The individual making the privacy complaint must give ADRBO 60 days to respond.