

Personal Information - Privacy Code



Shinhan Bank
Canada

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PERSONAL INFORMATION – PRIVACY CODE

1. Our Commitment to Privacy

Shinhan Bank Canada is committed to protecting your privacy and maintaining the confidentiality of your personal information. This Privacy Code outlines our practices related to the collection, use and disclosure of personal information. This Privacy Code applies to personal information that we collect in any of our dealings with you, including when you visit, use or interact with our online or other digital services.

2. What is “Personal Information”?

Personal information is information about an identifiable individual, but does not include business contact information that is solely used to communicate with you in relation to your employment, business or profession, such as your title, business address or telephone number.

Information that is aggregated or anonymized and cannot be used, either alone or in combination with other information, to identify an individual is not considered personal information.

3. What Personal Information We Collect

We may collect different types of personal information about you, depending on our business relationship with you and how you interact with us. Your receipt of different products and services may require the collection of different kinds of personal information.

Generally, we collect the following types of personal information (this is not an exhaustive list and not all of which may apply to you):

- identity information, such as your name, username or similar identifier, marital status, title, date of birth, gender, occupation and Social Insurance Number
- contact information, such as your address, e-mail address and telephone numbers;
- financial information, such as your financial and transaction records, tax returns, net worth statements, employment income and credit information
- technical and usage information when you use our website or online services, such as your internet protocol (IP) address, social media platform data, 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, mobile application or other online services
- marketing and communications information, such as your preferences for receiving updates from us and records of your correspondence with us
- photo of your identification, selfie photos or videos

If you would like to open an interest-bearing or investment account with us, *the Income Tax Act* requires that we ask for your Social Insurance Number.

When we verify or update your personal information with a credit bureau, your Social Insurance Number is the most effective way of ensuring that we access the correct credit report. However, the provision of your Social Insurance Number for this purpose is purely voluntary. Should you choose not to provide us with this piece of personal information, we will still be able to perform credit verifications and updates with a credit bureau using other personal information for identification purposes.

4. How We Collect Personal Information

We collect personal information by fair and lawful means. Most personal information is collected directly from you. With your consent, we may also collect personal information from other sources such as credit bureaus or your employer. For example, we may verify information you provided regarding your employment with your employer or credit related information with a credit bureau.

In certain circumstances, we may collect personal information that you had previously provided to one of our affiliates in order to facilitate the provision of products and services to you by us, including determining your creditworthiness.

5. How We Use Personal Information

We use your personal information to provide certain financial and related services to you, manage our operations, and comply with legal and regulatory requirements. This includes:

- opening and maintaining your account(s) with us;
- providing you with financial products and services you have requested;
- determining suitability of products and services for you, including by assessing your eligibility for credit products;
- establishing and verifying your identity;
- providing related administrative services;
- administering your access to our online services and mobile application;
- enabling you to register for and participate in our loyalty or rewards programs;
- communicating with you to provide you with information about other products and services that may be of interest to you;
- managing your relationship with us;
- understanding our customers and developing and tailoring our products and services;
- detecting and preventing fraud and unauthorized or illegal activities; and
- complying with legal and regulatory requirements

6. Our Use of Cookies

When you use a digital service offered by SHBC, including when you log-in to online banking or use our mobile app, we may collect information about your digital access device including IP address, operating system, model, name of your wireless carrier/internet service provider, settings, and locational data, as well as personal information such as transaction data, online activity, and use of the digital services. Some of this information is collected via “cookies”, which may be placed on your digital access device in the form of a small text file, or other similar tracking technologies.

We use this information to facilitate the use of our digital services and for our business or analytical purposes (including to assess website traffic and track search criteria).

Targeted Advertising

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 Digital Services, and across third-party websites or service offerings when you leave our website or mobile app. Interest-based advertising means that your preferences and interests are collected through cookies or similar technologies and then used to enhance your online experience and deliver tailored marketing communications that are relevant to you, based on those preferences and interests.

You may withdraw your consent for marketing-related activities at any time by updating your preferences through our mobile app or by contacting us. If you do not wish to accept cookies, you can also 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. Please refer to your web browser's help pages for more information. Some areas or features of our Digital Services rely on cookies and may not work if you delete or decline cookies.

Google Analytics

Our website uses Google Analytics, a service from Google LLC that uses cookies. The information collected by the cookies (which includes your IP address) is transferred to Google who stores and processes the information in the United States. Google uses the information to provide us with an analysis of your use of our website and overall use of and traffic on our website. You can opt out of Google Analytics by downloading and utilizing the Google Analytics Opt-out Browser Add-on. By using our website, you understand and acknowledge our use of Google Analytics.

7. Obtaining Your Consent

Your knowledge and consent are required before we may collect, use or disclose your personal information, except in particular circumstances as required or permitted 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.

For example, when you apply for one of our financial products or services, we ask for your consent to the collection, use and disclosure of your personal Information to provide you with that product or service. We will not use or disclose your personal information beyond the scope of the purposes for which we have obtained your consent without first obtaining your consent to such new use or disclosure.

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 Code.

Subject to legal and contractual requirements, you may withdraw your consent to the collection, use or disclosure of personal information at any time. If you wish to withdraw your consent, please contact us using the information listed under **"How to Contact Us"**. We will respond to any such request in a timely manner. If accommodating your request would limit or prevent us from providing you with a product or service you have requested, we will explain the implications of your request to you at the time you refuse or withdraw your consent.

8. Your Subscription Preferences

We may from time to time contact you to provide you with information about additional products and services which we feel might be of interest to you. Should you not wish to receive such communications from us, you may opt out by clicking the "unsubscribe" link at the bottom of any email you receive from us or by contacting us at the information listed under **"How to Contact Us"**.

If you opt out from receiving marketing-related communications, we may still need to send you communications about your use of our products or services or other matters.

9. How We Share Your Personal Information

We will not disclose your personal information for purposes other than those described in this Code or of which we informed you at the time of its collection, unless we obtain your prior consent to such disclosure or unless such disclosure is required or permitted by law.

We may share your personal information with third parties for the purposes described below:

- **Service Providers:** We may share your personal information with service providers that we retain to perform functions on our behalf or to provide services in support of the products and services we provide. When transferring personal information to a service provider, we transfer only the personal information which is required in order to perform the function or service for which the service provider has been retained. All service providers to whom we transfer personal information are required to protect the 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.
- **Credit Bureaus:** We may share your personal information with credit reporting agencies and other lenders on an ongoing basis to review and verify your creditworthiness, establish credit and hold limits, help us collect a debt or enforce an obligation owed to us by you, and manage and assess our risks.
- **Rewards Program Partners:** If you subscribe to a loyalty or rewards program offered by Shinhan Bank Canada, we may share your personal information with certain partners of that program to facilitate your participation in the program.
- **Members of the Shinhan Bank Financial Group:** We may share your personal information with Shinhan Bank Financial Group world-wide subsidiaries and affiliates to manage your relationship with Shinhan Bank Financial Group, to prevent credit and other business risk, and to meet legal and regulatory requirements. If you prefer we do not share information within the Shinhan Bank Financial Group or you would like to withdraw consent, please contact us at the information listed under “How to Contact Us”.
- **Prospective Business Transactions:** In the event of business transactions, such as a sale of some or all of our business, your personal information may be disclosed to an acquiring organization, either as part of due diligence and/ or on completion of the transaction. If your personal information is disclosed to a third party in this context, we will require that the third party protect the information and keep it confidential and secure.
- **Legal Requirements:** In certain circumstances, we may disclose your personal information without your knowledge or consent, as required or permitted by law. This may occur if we are compelled to disclose personal information to a regulatory or law enforcement authority or to a court of law. We are also permitted to disclose certain personal information in order to collect on an overdue account, or required to detect or prevent fraud.

10. Safeguards

We use technological, organizational and physical safeguards to protect against unauthorized access, use, disclosure, modification, destruction, loss or theft of your personal information. 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 online account with us, you must 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.

11. Retaining Your Personal Information

We will retain your personal information only for the time it is required for the purposes for which it was collected and for a reasonable length of time thereafter in case we need to meet any potential obligations or legal or regulatory requirements. We have adopted a retention policy that reflects our obligations under privacy legislation and sets minimum and maximum retention periods for personal information. Once your information is no longer required, it is securely destroyed or made anonymous as appropriate.

We may transfer your personal information outside of Canada to fulfil the purposes for which we collected it, including for processing and storage by our service providers. When your personal information is outside of Canada, it is subject to the laws of the foreign jurisdiction in which it is located, including those laws governing disclosure of personal information, which may be different than Canadian privacy laws.

12. Maintaining Accuracy of Your Personal Information

Your personal information should be accurate, complete and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about you. We expect you to provide us with updates to your personal information, when required. We will not routinely update your personal information unless such a process is necessary.

13. Accessing and Correcting Your Personal Information

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. If you have a sensory disability, we will provide access to your personal information in a requested alternative format as required by law.

In some cases, we may not be able to provide you with access to your personal information, including the following circumstances:

- if doing so would reasonably be expected to threaten the life or security of another individual;
- if disclosure would reveal confidential information;
- if the personal information is protected by solicitor-client privilege; or
- if the information was collected during the investigation of a legal matter or for purposes related to the detection and prevention of fraud.

If we are unable to provide you with access to your personal information, we will advise you in writing of the reason(s) for the refusal, unless we are prohibited from doing so by law.

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 or incomplete, 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.

To fulfill your request to access or correct your personal information, we may need to verify your identity, and may request your signature

14. Changes to this Privacy Code

An up-to-date version of this Privacy Code is available on our website at www.shinhan.ca. Upon request, a paper version of the policy can be obtained by contacting using the contact information in the “How to Contact Us” section below.

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

15. How to Contact Us

We are accountable for the treatment of all personal information under our control. We have designated a Privacy Officer to be responsible for overseeing privacy compliance within Shinhan Bank Canada.

If you have any questions or concerns regarding this Privacy Code or any of our privacy practices, please direct all privacy-related inquiries to our Privacy Officer.

Shinhan Bank Canada Privacy Officer

5140 Yonge Street, Suite 2300

Toronto, ON M2N 6L7

Telephone: (416) 250-3500

Email: privacy@shinhan.ca

All questions or complaint will receive a timely response. If your concern of complaint is justified, we will take steps to resolve it, including, if necessary, amending our privacy practices.

16. Office of the Privacy Commissioner of Canada (OPC)

If you are not satisfied with our response to your questions or concerns regarding this Privacy Code or our privacy practices, you may contact the Office of the Privacy Commissioner at:

Officer of the Privacy Commissioner of Canada

30 Victoria Street

Gatineau, Quebec K1A 1H3

Telephone: 1-800-282-1376

Additional information can be obtained on the website of the Office of the Privacy Commissioner at www.priv.gc.ca.

