



**FIRST NATIONS BANK
PRIVACY CODE**

FIRST NATIONS BANK
The Aboriginal Bank **OF CANADA**

The First Nations Bank of Canada *commitment to privacy*

Protecting your privacy and the confidentiality of your personal information has always been fundamental to the way we do business within First Nations Bank of Canada¹.

We strive to provide you with the best customer service. To us, that includes treating you fairly and with respect.

The First Nations Bank Privacy Code² informs you of our policy on privacy, and tells you about the ways we help ensure that your privacy and the confidentiality of your information are protected.

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Our privacy policy

Our privacy policy informs you of the policies and practices we have in place relating to the management of personal information at First Nations Bank of Canada. The word “*information*” means personal, financial and other details about you that you provide to us and we obtain from others outside our organization, including through the products and services you use. This policy applies to personal customers, including individuals carrying on business alone or in partnership with other individuals and signing officers of our business customers.

It consists of five key principles:

1. Collecting and using information

Either before or when we collect information about you, we will explain how we intend to use it. We will limit the information we collect to what we need for those purposes, and we will use it only for those purposes. We will obtain your consent if we wish to use your information for any other purpose and before collecting information from third parties such as credit bureaus.

Your personal financial information is used to help us manage operations and risk within First Nations Bank of Canada. Your information is also used in order to satisfy valid information requests from regulators and other organizations or individuals who are legally entitled to make such requests.

Call Taping

We may monitor and/or record your telephone discussions with our representatives for our mutual protection, to enhance customer service, and to confirm our discussions with you.

Customers who prefer not to have their calls taped can transact business at a branch location, through Internet Banking, or through automated banking machines.

2. Releasing information

We may provide your information to other persons in situations where –

- we have your consent
- the other parties are our suppliers or agents who assist us in serving you
- we are required or permitted to do so by law or applicable regulators and self-regulatory organizations
- transfers of a business are involved

3. Protecting information

We will protect your information with appropriate safeguards and security measures. We will retain your information only for the time it is required for the purposes we explain.

4. Providing information access and accuracy

We will give you access to the information we retain about you. We will make every reasonable effort to keep your information accurate and up-to-date.

5. Respecting and responding to your privacy concerns

In the First Nations Bank of Canada Privacy Code, we will explain your options for refusing or withdrawing consent to the collection, use and release of your information, and we will record and respect your choices. We will investigate and respond to your concerns about any aspect of our handling of your information.

In the First Nations Bank of Canada Privacy Code, we will explain how we fulfill each of these important principles.

Why we ask for your information

We ask you for information to establish and serve you as our customer.

At the time you begin a relationship with us and during the course of our relationship, we may collect information about you. We obtain most of our information about you directly from you. The information we ask for depends on which product or service you want. For every product or service, we need your name, address, birthdate, occupation and some identification. Here is why we need some of the other information we ask you to provide.

Birthdate

This helps us identify you and ensure that no one is trying to impersonate you. We may also use it to determine your eligibility for products and services that may be of benefit to a particular age group.

Social Insurance Number (SIN)

Your SIN is required for products which earn investment income, in order to comply with the Canada Revenue Agency's income reporting requirements. Providing your SIN for credit products is optional. If you provide your SIN, we also use it to keep your information separate from that of other customers with a similar name, including information we obtain with your consent through the credit approval process.

Employer name and address

This is required when a new account is opened or when you apply for credit in order to comply with anti-money laundering regulations.

Financial information

This is used to assess your eligibility for any credit product, for example, a line of credit or other loan. We may collect information from you and service providers with whom you make arrangements to provide those services (for example when you set up bill payments through your account). We will use your financial information, including transaction records that reflect your business dealings with and through us, to help us serve you as a customer and meet your financial needs.

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Health information

This is required for some insurance products to ensure you are eligible for coverage, and may also be used to investigate and adjudicate your claims, and to help manage and assess our risks.

The health-related information you provide in connection with an insurance product will never be shared within First Nations Bank of Canada, however, it may be shared with administrators, service providers and reinsurers of the insurance operations to process your insurance transactions.

We only collect the information we need and only use it for the purposes explained to you.

When you apply for a new product or service, we will indicate in the application or agreement how we intend to use your information. We will only ask for the information we need for that particular product or service. We will indicate clearly which information would help us to serve you but is optional for you to provide.

How we obtain your consent

It is important to understand the different ways that we may obtain your consent to collect, use, disclose and share your personal information.

Depending on the situation and the sensitivity of the information, we may obtain your consent in different ways. Express consent may be obtained verbally, online or in writing. Implied consent may be obtained through your use of a product, or when you approach us to obtain products or services from us.

We will not make your consent a condition of obtaining a product or service, unless it is reasonably or legally required, and we will clearly indicate when this is the case.

Why we share your information

We share information within First Nations Bank of Canada to manage our business risks and operations, and to comply with legal or regulatory requirements.

With your consent, we may share your information within First Nations Bank of Canada. This will help us serve you

better and determine whether any products or services of First Nations Bank of Canada are suitable for you so that we can offer them to you.

We want to serve you better and meet your customer service expectations. Agreeing to let us share your information within First Nations Bank of Canada helps us to meet this goal.

Sharing information lets us instantly recognize your total relationship with First Nations Bank of Canada, no matter when or where you contact us or which one of us you contact. It also means that in some circumstances, changes to your information can be made once and be effective for all your products or services with First Nations Bank of Canada.

Sharing your information also helps us determine your financial needs because it allows us to review what First Nations Bank of Canada products you have and how you use them. We may then offer you other First Nations Bank of Canada products and services – including special promotions – that we believe will be of interest to you.

This consent is optional and you can decide to withdraw it at any time for the purposes listed above. Please refer to the “Respecting your preference” section.

Why we ask others for information about you

With your consent, we may obtain information about you from third parties, including credit reporting agencies.

Obtaining additional information about you from parties outside First Nations Bank of Canada helps us assess your eligibility for our products.

For credit products, for example, we need to know your creditworthiness. For this reason, we may contact other lenders or credit reporting agencies to get information about you and your credit history. We may also contact employers or other personal references to verify information that you have given us. We will not do this without your consent, but please remember that if you do not give your consent we may not be able to extend credit products to you.

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When we release your information

We do not sell or rent customer lists or information to others.

However, we may release your information to parties outside First Nations Bank of Canada in certain circumstances, which include –

With your consent

On an ongoing basis, we will disclose your credit history with us to other lenders or credit reporting agencies in order to support the credit process.

We release only the information required to identify you, as well as facts from our credit records about your repayment history.

We may disclose your account information to a joint account holder, including information about the account prior to it becoming a joint account.

Disclosure without Consent

We are permitted to disclose your personal information without your knowledge or consent:

- *to another organization (i.e. from one business to another) in order to investigate a breach of an agreement or a contravention (or anticipated contravention) of a federal or provincial law where it is reasonable to expect that obtaining the consent from you for the disclosure would compromise the investigation.*
- *for the purposes of detecting or suppressing fraud.*
- *to a government institution or to your next of kin or authorized representative if there are reasonable grounds to believe that you have been the victim of “financial abuse” and where it is reasonable to expect that obtaining your consent for the disclosure would compromise the ability to prevent or investigate the abuse.*

For servicing purposes

We give a limited amount of information, only as necessary, without your consent, to our suppliers and agents; for example, cheque printers and bank card manufacturers who provide goods and services to you through us. These suppliers and agents may be located in Canada or other jurisdictions or countries and may disclose information in response to valid demands or requests from governments, regulators, courts and law enforcement authorities in other jurisdictions or countries.

When required or permitted to do so by law or applicable regulators and self-regulatory organizations

We may release information in response to a search warrant, court order, or other demand or inquiry which we believe to be valid. This may include requests from regulators, including self-regulators, who are responsible for ensuring First Nations Bank of Canada is in compliance with applicable regulations (e.g. The Office of the Superintendent of Financial Institutions). We may disclose information to help us collect a debt owed to us by you. We may also disclose information to an investigative body in the case of a breach of agreement or contravention of law – this helps prevent fraud, money laundering or other criminal activity.

Transfers of a business

As First Nations Bank of Canada continues to develop and grow, we may buy or sell parts of our businesses. As our businesses consist primarily of our customer relationships, personal customer information and information regarding the particular account or service being purchased or sold would generally be one of the transferred business assets.

How we protect your information

We will protect your information with appropriate safeguards and security measures.

We have thorough security standards to protect our systems and your information against unauthorized access and use.

For example, our systems have been designed to ensure that your Personal Identification Number (PIN), password and other access codes are always private and confidential. For your protection, your access codes are known only to you – our employees cannot gain access to them and they will not ask you to reveal them.

All our suppliers and agents, as part of their contracts with First Nations Bank of Canada, are bound to maintain your confidentiality and may not use the information for any unauthorized purpose.

When we provide information in response to a legal inquiry or order, we ensure that the order is valid and we disclose only the information that is legally required.

All employees of First Nations Bank of Canada are familiar with the procedures that must be taken to safeguard customer information. And to us, protecting the confidentiality of your information is more than a procedure – it's part of our job. It is specified in our employment agreements and regularly confirmed in writing.

We audit our procedures and security measures regularly to ensure that they are being properly administered and that they remain effective and appropriate to the sensitivity of the information.

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We retain your information only as long as it is required for the reasons it was collected.

The length of time we retain information varies depending on the product or service and the nature of the information. This period may extend beyond the end of your relationship with us but only for so long as it is necessary for us to have sufficient information to respond to any issue that may arise at a later date. When your information is no longer needed for the purposes explained to you, we have procedures to destroy, delete, erase or convert it to an anonymous form.

Your right to access your information

We will give you access to the information we have about you. If requested, we will assist you in making your request.

Most of this information is in the form of your transaction records. These are available to you through your account statements by visiting the branch or office where your account is held, or by accessing your account through Internet Banking, Telephone Banking, and First Nations Bank automated banking machines.

If you require other information, simply contact or forward a written request to the branch or office where your account is held. We will ask you for specific details such as branch and account number. We will advise you in advance if a minimal charge will be required for conducting the search, and we will respond to your request within 30 days.

Please note that we may not be able to provide information about you from our records which contains references to other persons, is subject to legal privilege, contains confidential information proprietary to First Nations Bank of Canada, relates to an investigation of a breach of agreement or contravention of laws, or cannot be disclosed for other legal reasons.

If you have any questions regarding decisions made about you, we will tell you the reasons for those decisions. Where relevant, we will provide you with the name and address of the credit bureau from which a report was obtained.

Keeping your information accurate

We will make every reasonable effort to keep your information accurate and up-to-date.

Having accurate information about you enables us to give you the best possible service and minimize the possibility that out-of-date information may be used to make a decision which impacts you. Allowing us to share your information within First Nations Bank of Canada means that, in some circumstances, updates to your information can be made once and be effective for all the products and services you have with First Nations Bank of Canada.

We have policies and procedures to help us maintain the accuracy of your information. For most updates, we rely on you for information. You can help by keeping us informed of any changes, such as if you move or change telephone numbers. If you find any errors in our information about you, let us know and we will make the corrections immediately, and make sure they are conveyed to anyone we may have misinformed. For information that remains in dispute, we will note your opinion in the file.

Respecting your preference

We will explain your options of refusing or withdrawing consent to the collection, use or release of your information, and, given reasonable notice, we will record and respect your choices.

In most cases you are free to refuse or withdraw your consent at any time. You may do so by contacting the branch or office where your account is held or by calling us at 1-888-819-6366 Option 2. Our staff will be pleased to explain your options and any consequences of refusing or withdrawing your consent, and record your choices.

There are several privacy preferences available to you, subject to legal, business or contractual requirements. If you prefer, you may choose not to have us –

- *Use your Social Insurance Number with credit reporting agencies as an aid to identify you*
- *Conduct a credit check in order to assess an application for credit*

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In doing so, however, we may not be able to extend credit services to you. Once you have a credit product with us, we will share your credit experience on an ongoing basis with other lenders and credit reporting agencies. You cannot withdraw your consent for this sharing of information as it is necessary to support the credit process.

- *Contact you occasionally either by mail, telephone or email, or all of these methods, with direct marketing offers that may be of benefit to you*

This does not include messages or other information about promotional offers we provide on, or enclosed with, your written or electronic account statements, or that we may discuss while talking with you. Any marketing campaigns that are already underway may not immediately take your preferences into account.

- *Share your financial and account information with other members of First Nations Bank of Canada*

This does not apply if you have requested a product or service that is jointly offered by more than one member of First Nations Bank of Canada.

- *Contact you to participate in customer research and surveys*

Addressing your concerns

If you have any questions, concerns or problems about privacy, confidentiality or how a request for information was handled, we encourage you to let us know, and you can take the following actions. If you choose to mail, fax or email us, please include your full name, address and telephone number.

STEP 1

Contact us in one of the following ways:

- Speak to a Customer Service Representative at your branch
- **Telephone:** Call 1-888-819-6366 Option 3 at any time

- **Mail:** Customer Feedback
First Nations Bank of Canada
224 4th Avenue South, 4th Floor
Saskatoon, Sask. S7K 5M5
- **Fax:** 1-306-931-2409
- **Email³:** fnbcservice@fnbc.ca

We'll work hard to provide an acceptable solution, but if you are not satisfied, the Manager will become involved in the resolution of your problem or concern.

STEP 2

Elevation to a Senior Officer

If you are not satisfied with the solution you receive from the Manager in Step 1, the Manager will offer to elevate your problem – communicating all relevant details on your behalf – to a representative of the Executive Office. If you prefer to elevate the problem yourself, the Manager will provide you with the contact information.

STEP 3

Contact the First Nations Bank Ombudsman

If your problem or concern remains unresolved after Steps 1 and 2, you may contact the First Nations Bank Ombudsman. If it is determined that your problem has not been addressed by the Executive Officer as described in Step 2, then the First Nations Bank Ombudsman may direct your problem to the appropriate business area for investigation and response. Within five days of receiving your inquiry, the First Nations Bank Ombudsman will write or call to advise you of the actions being taken.

You may contact the First Nations Bank Ombudsman by:

- **Mail:** First Nations Bank Ombudsman
224 4th Avenue South, 4th Floor
Saskatoon, Sask. S7K 5M5
- **Fax:** 306-931-2409
- **Email³:** fnbcservice@fnbc.ca
- **Telephone:** 1-888-819-6366 Option 4

STEP 4

Contact the Ombudsman for Banking Services and Investments (OBSI)

If your concern still remains unresolved after contact with the First Nations Bank Ombudsman, you may then contact the OBSI by:

- **Mail:** The Ombudsman for Banking Services and Investments (OBSI)
401 Bay Street, Suite 1505
P O Box 5
Toronto, ON M5H 2Y4
- **Toll-Free Fax:** 1-888-422-2865
- **Email³:** ombudsman@obsi.ca
- **Toll-Free Telephone:** 1-888-451-4519

You may also contact The Office of the Privacy Commissioner of Canada at Place de Ville, 112 Kent Street, 3rd Floor, Ottawa, Ontario K1A 1H3, or call toll-free at 1-800-282-1376.

Our online privacy policy

Protecting your privacy and the confidentiality of your personal information has always been fundamental to the way we do business with you within First Nations Bank of Canada, whether over the Internet, on the telephone or at our branches and offices.

We developed the First Nations Bank Privacy Code brochure to inform you of our policy on privacy and tell you about the ways we ensure that your privacy and the confidentiality of your information are protected.

Many of you have questions about how we are handling the information we obtain from you when you visit our websites. This online privacy policy will answer your questions about the information we collect when you visit a First Nations Bank of Canada website, and how we use it.

Visiting our information sites

When you go directly to the information portion of our websites and move from page to page, read pages or download content onto your computer, we learn which pages are visited, what content is downloaded, and the address of websites that you visited immediately before coming to our websites. However, none of this is

associated with you as an individual. It is measured only in aggregate.

We use this information to find out how many people visit our websites and which sections of the sites are visited most frequently. This helps us in understanding what type of information is most useful to our website visitors so that we can improve our websites and make it easier for our website visitors to access information. We record the statistical information on the numbers of visitors to our websites, but no information about you in particular will be kept or used.

Using Internet Banking transaction services

When you register for one of the Internet transaction services, we compile a profile of you for that service (e.g. name, address, account numbers, log-in ID, IP address, etc.). Each time you use the Internet services, we collect your log-in ID, information about the transactions that you complete and the informational pages of the web that you visit while using the service.

We use your profile in responding to your inquiries on the service. We use your log-in ID to identify you as a user of the service. We use the transaction information in the aggregate to assess and improve the service. We use specific transaction information for servicing purposes (e.g. billing).

We use both your transaction information and the informational pages of the website that you have visited to determine your financial needs so that we can offer other First Nations Bank of Canada products and services to you.

Cookies

A cookie is a small file containing certain pieces of information that a website creates when you visit the site. It can track how and when you use a site, which site you visited immediately before, and it can store that information about you.

There are two common types of cookies, “session cookies” and “persistent cookies”. Session cookies store information only for the length of time that you are connected to a website – they are not written onto your hard drive. Once you leave the website, the originator of the cookie no longer has the information that was contained on it.

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First Nations Bank of Canada uses session cookies as an additional security feature for their online services. For example, when you log in to any web service and are authenticated through your log-in ID and password, a cookie will store the identification number of your browser. Throughout your session, the cookie acts as a type of digital signature to identify your current session to the web server.

We also use session cookies to track your visits within our site. We use that information to determine the type of information that you are looking for in our site and to improve our site. We use information about the site you visited immediately prior to our site to assess the viability of links to our site that we have created on third party sites.

The information stored in “persistent cookies” is written onto your hard drive and remains there until the expiry date of the cookie. First Nations Bank of Canada use persistent cookies to store non-sensitive information that you are aware of and have agreed to. For example, if you choose the option on our log-in screen to remember your First Nations Bank of Canada Access Card number or Personal Access Code for Internet Banking, the system will remember and automatically input your Access Card number or Personal Access Code each time you use the service from that PC.

Internet Banking also employs one additional “persistent” cookie, designed to deliver a more comfortable online banking experience to you. The one additional cookie is employed to ensure that any online targeted offer which you have already responded to is not presented again each time you log in to Internet Banking.

All persistent cookies used by Internet Banking are encrypted for additional security.

Currently, most browsers do not distinguish between session cookies and persistent cookies. For web services to operate, your browser must be set to accept cookies. If you are concerned about having your browser enabled to accept cookies while you are surfing other websites, we recommend that you enable your browser to notify you when it is receiving a cookie. This gives you the ability of accepting or rejecting any cookie presented by the web server you are visiting.

Flash – Local Shared Object

Local shared objects, sometimes referred to as “Flash cookies”, are data files that a website creates when you visit the site. Shared objects are most often used to enhance your web-browsing experience.

A local shared object is like a browser cookie, except that it can also store data more complex than simple text. Shared objects, by themselves, can’t do anything to or with the data on your computer. More importantly, shared objects cannot access or remember your email address or other personal information unless you willingly provide such information.

We use Flash to store information such as IP address and browser type. The information is collected to assist us in authenticating you and your computer.

For more information about Flash, please visit www.adobe.com

Email comments, questions or responses

When you send us an email or when you ask us to respond to you by email, we learn your exact email address and any information you have included in the email.

We use your email address to acknowledge your comments and/or reply to your questions, and we will store your communication and our reply in case we correspond further. We will not sell your email address to anyone outside First Nations Bank of Canada. We may use your email address to send you information about offers on products and services that we believe may be of interest to you. If you don’t want us to contact you by email with offers on products and services, you may tell us so at any time.

If you have asked us to put you on an email mailing list to provide you with certain information on a regular basis, or if we send you information about our offers on products and services by email, you may ask us to remove you from the list at any time (using the unsubscribe instructions provided with each email and on the site where you signed up).

Remember that email sent over the Internet is generally unencrypted. If First Nations Bank of Canada requests that you transmit confidential information to us over the Internet when filling out an application online, we ensure that such transmission is encrypted. We

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recommend that you use caution when forwarding free-format email messages to us and that you do not include confidential information (such as account numbers) in those messages, as they are not encrypted.

Important Information about Preventing Email Fraud:

From time to time, fraudulent emails may be circulated to you claiming to have been issued by Canadian banks, requesting customers to verify their personal and/or banking information. Customers are often asked to click on a link in the email that directs them to a pop-up window or modified online banking log-in page to enter their respective bank's log-in ID and password.

We will never send email messages to customers requesting confidential information such as passwords or account numbers. Please do not act on any such emails as you may compromise your banking information by following links to a counterfeit Internet site(s).

Responding to contests or surveys

When you submit your response to a survey question or enter one of our contests, we learn your answer or any opinions or information that you volunteer.

In a contest, we will use your personal information for the purpose of awarding a prize. For a survey, we may use your submission to come up with the survey results, and we may publish those results in aggregate on our websites. We may also use your response to improve products or services of First Nations Bank of Canada. Based on your participation in either, we may forward information about our offers on products and services that we believe may be of interest to you.

- 1 First Nations Bank of Canada means First Nations Bank of Canada, its affiliates and third parties who provide deposit, investment, loan, securities, trust, insurance and other products and services.
- 2 The "First Nations Bank Privacy Code" complies with the provisions of the Personal Information Protection and Electronics Documents Act.
- 3 Email disclaimer: For your protection, do not send confidential or personal information (e.g. Access Card number, account numbers, etc.) via email, as it is NOT a secure method of communication. If your request is urgent or requires disclosure of confidential or personal information for resolution, please call us.

CANADA



FIRST NATIONS BANK

The Aboriginal Bank

OF CANADA

Who can answer your questions *about privacy?*

To review your options under the First Nations Bank Privacy Code, simply visit any branch or office, or call toll-free

Saskatoon, SK: 1-888-454-3622

Winnipeg, MB: 1-866-519-5898

Walpole Island, ON: 1-800-647-7347

Chisasibi, PQ: 1-888-825-3458

Whitehorse, YT: 1-888-456-3622

Meadow Lake, SK: 1-877-434-3622

Iqaluit, NT: 1-877-975-3770

Website: fnbc.ca

Email: fnbcservice@fnbc.ca