



OUR COMMITMENT TO YOU

Alterna (“Alterna”, “we”, “us” or “our”) has a long-standing tradition of providing quality service. As such we take privacy seriously. We take steps to protect the confidentiality and security of your personal information. The purpose of this Privacy Policy is to inform our members/clients and other individuals we deal with (“you” or “your”) of how we collect, use, disclose and protect your personal information. This Privacy Policy applies to our collection, use and disclosure of personal information in Canada. This Privacy Policy does not apply to information about our employees or to information that is not personal information.

YOUR RESPONSIBILITIES REGARDING PRIVACY

As a member/client you are given access to certain systems in order to conduct transactions easily. This access includes Personal Identification Numbers (PINs) for ABMs and Personal Access Codes (PACs) or passwords for Online and Telephone Banking.

These numbers are not visible to Alterna. It is up to you to protect this information and prevent misuse. It is important to safeguard the personal or banking information you choose to hold, whether it’s account or credit card statements, unused cheques or PIN/PAC codes.

Also, remember that email sent over the internet is usually not transmitted in an encrypted format. We suggest you do not send confidential information to us or anyone else by unencrypted email.

Finally, phishing is a practice where fraudsters use electronic communication to pose as legitimate organizations in order to obtain sensitive account information. If a security concern or other important matter arises, we will never inform you by email, but may use secure online banking intranet service to communicate with you. We will also never request sensitive information from you by email. If you receive a communication of that type, do not reply, and contact Alterna directly for more information.

PERSONAL INFORMATION WE COLLECT

We collect personal information in order to offer and provide financial products and services to you and to establish and serve you as our member/client. We collect personal information from you, for example, on an application form or through your ongoing interactions with us. We may also collect personal information from third parties, such as credit reporting agencies, financial institutions, references, employers and other third party sources (such as government registries and public records). Personal information we collect includes:

- Name, address, telephone number(s), email address and other contact information.
- Additional information for identity matching and credit check purposes, such as your occupation, name and contact information of your employer, assets, income, previous address, date of birth, social insurance number and other government issued identification.
- Information about your dealings with and through us, such as account information, transaction and payment history and records relating to any inquiries or complaints.
- Other information we may collect with your consent or as permitted or required by law.

HOW WE COLLECT PERSONAL INFORMATION

We use personal information to provide requested financial products and services and to otherwise administer our business, including to:

- Verify your identity and the accuracy and completeness of information you provide to us.
 - Assess your current and ongoing creditworthiness, financial situation and eligibility for products and services offer by us or our business partners.
 - Evaluate and process your application.
 - Open, administer and service your account(s) and provide and administer any requested products and services.
 - Detect and prevent fraud and other illegal or unauthorized activities.
 - Collect a debt or enforce an obligation owed to us.
 - Provide you with information about special offers, contests, or community events.
 - To meet legal, regulatory, self-regulatory, risk management, fraud prevention and security requirements, including checking your identity against money laundering, terrorist financing or similar watch lists established by regulatory agencies or similar bodies in Canada, the United States or in other countries.
 - Manage and assess our risks, operations and relationship with you, and to analyze your needs and the effectiveness of our marketing or customer service efforts.
- Provision of social insurance number (SIN) is optional for non-income generating products or services and mandatory for income-generating products or services.

SIN, where provided, will be used for income tax reporting purposes (where applicable) and to identify you for credit matching purposes (if you have consented to such). We may monitor and record telephone calls, internet live chats and email for quality assurance, training and record keeping purposes. We may also use personal information for other purposes with your consent or as permitted or required by law.

WHEN WE SHARE PERSONAL INFORMATION

We may disclose your personal information with your consent or in the following circumstances:

- To credit bureaus, credit reporting agencies and to your current or future creditors for the purposes of maintaining your credit history and providing credit references.
- To third parties as reasonably necessary to:
 - collect a debt or enforce an obligation to us;
 - detect and prevent fraud;
 - in connection with audits; and
 - for the purposes of meeting legal, regulatory, industry self-regulatory, risk management, fraud prevention and security requirements, which may include disclosures in compliance with suspicious activity reporting requirements under anti-terrorism, anti-money laundering and similar laws and regulations in Canada or in foreign countries.
- If you are an Alterna Bank customer, to Alterna Savings so that it may promote its products and services to you, if you have given your consent to such disclosure.
- If Alterna Savings member, to Alterna Bank so that it may promote its products and services to you, if you have given your consent to such disclosure.
- For other purposes as permitted or required by law.

SERVICE PROVIDERS

We may transfer personal information to outside agents or service providers (including affiliates acting in this capacity) (“service providers”) that perform services on our behalf, for example plastic card issuers, cheque providers, plan trustees, call centre, mailing, billing, marketing, information technology and/or data hosting or processing services or similar services, or otherwise collect, use, disclose, store or process personal information on our behalf for the purposes described in this Privacy Policy.

Some of these service providers may be located outside of Canada, including in the United States, and your personal information may be collected, used, disclosed, stored and processed outside of Canada for the purposes described in this Privacy Policy. While your personal information is located outside Canada it will be subject to applicable foreign legal requirements, which may include lawful requirements to disclose personal information to government or national security authorities in certain circumstances.

BUSINESS TRANSACTIONS

Personal information may be used and disclosed to parties connected with the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of Alterna or our business or assets, for the purposes of evaluating and/or performing the proposed transaction. Our assignees or successors may use and disclose your personal information for similar purposes as those described in this Privacy Policy.

COOKIES

Alterna uses cookies and other similar technologies on our websites and advertisements. Through these cookies, we collect data to better understand how you’re using our site to give you the best possible online user experience and to improve our online services. We may also show you Alterna ads you may find interesting on our mobile apps, our website and third-party websites or apps.

Cookies are small text files that a web server places on your computer or mobile device. We use two types of cookies on our website: session cookies and persistent cookies. A session cookie is a cookie that is erased when you close your browser. Session cookies are stored in temporary memory and are not retained after your browser is closed. We use session cookies to record certain information from your browser including your Internet Protocol (IP) address, browser type, internet service provider and operating system.

We also use session cookies to identify the pages or features of our website that you visit or use, the websites that you visit before and after your visit to our website and the dates and times that you visit our website. We use this information to remember you during your visit to our website and to improve our website, products and services.

A persistent cookie is stored on your computer or mobile device until it expires or is deleted. We use persistent cookies to recognize you when you return to our website, to remember your preferences (such as language or other settings) and to help block unauthorized attempts to access your personal information.

You may be able to set your web browser to delete or block cookies or to warn you before a cookie is sent. Check the settings or help section of your web browser for more information. Please note that if you delete or block certain cookies, you may not be able to benefit from all features of our website. We may use some technologies (i.e., pixel, web-technologies) to tell us whether our advertising, operational communications and marketing messages have been accessed. We may use this information for determining which of our communications, advertising and marketing messages are effective or interesting to you.

YOUR CONSENT

Alterna collects, uses and discloses your personal information with your consent, except as permitted or required by law.

We may be required or permitted under statute or regulation to collect, use or disclose personal information without your consent, for example to comply with a court order, to comply with local or federal regulations or a legally permitted inquiry by a government agency, or to collect a debt owed to us. Consent to the collection, use and disclosure of personal information may be given in various ways. Consent can be express (for example, orally, electronically or on a form you may sign describing the intended uses and disclosures of personal information) or implied (for example, when you provide information necessary for a service you have requested).

You may provide your consent in some circumstances where notice has been provided to you about our intentions with respect to your personal information and you have not withdrawn your consent for an identified purpose, such as by using an "opt out" option provided, if any. Consent may be given by your authorized representative (such as a legal guardian or a person having a power of attorney). Generally, by providing us with personal information, we will assume that you consent to our collection, use and disclosure of such information for the purposes identified or described in this Privacy Policy, if applicable, or otherwise at the time of collection.

You may withdraw your consent to our collection, use and disclosure of personal information at any time, subject to contractual and legal restrictions and reasonable notice. However, if you withdraw your consent to certain uses of your personal information, we may no longer be able to provide our products or services.

You can unsubscribe from our communications at alterna.ca or alternabank.ca

Your Choices about Your Personal Information
If you would prefer not to receive promotional information from Alterna, please complete the Privacy Opt-out Form available on alterna.ca or alternabank.ca, contact us or visit any Alterna branch. Please note that if you opt-out of promotional information from Alterna you will continue to receive information pertaining to regulatory and business matters (for example tax receipts and notices).

HOW DO WE STORE YOUR PERSONAL INFORMATION

The length of time Alterna keeps your information will vary depending on the product or service and the type of information we have. We keep your information for as long as we reasonably need it for customer service, legal or reasonable business purposes. For these reasons, we keep some of your information beyond the end of your relationship with us. When your information is no longer required, we securely destroy it.

SAFEGUARDING YOUR INFORMATION

We take reasonable steps to protect your personal information using physical, electronic or procedural security measures appropriate to the sensitivity of the information in our custody or control, which may include safeguards to protect against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Authorized employees, agents and mandataries of Alterna who require access to your personal information in order to fulfil their job requirements will have access to your personal information.

ACCESS, CORRECTION AND CONTACTING ALTERNA

We may establish a file of your personal information for the purposes described in this Privacy Policy, which will be maintained at your branch or on our secure servers (or those of a service provider). If you wish to request access or correction of your personal information in our custody or control, you may write to our Chief Privacy Officer at 319 McRae Avenue, 1st floor, Ottawa, ON K1Z 0B9 or chiefprivacyofficer@alterna.ca. Your right to access or correct your personal information is subject to applicable legal restrictions. We may take reasonable steps to verify your identity before granting access or making corrections.

If you wish to make inquiries or complaints or have other concerns about our personal information practices, please contact your branch or the Contact Centre at:

	Alterna Savings	Alterna Bank
Telephone:	1.877.560.0100	1.866.560.0120
Email:	getintouch@alterna.ca	questions@alterna.ca
Mail:	Contact Centre, 319 McRae Avenue, 1st Floor, Ottawa, ON K1Z 0B9	

PRIVACY POLICY CHANGES

This Privacy Policy may be revised from time to time. We will take reasonable steps to notify affected individuals of material changes to this Privacy Policy, including by posting the revised Privacy Policy on our websites at www.alternabank.ca and www.alterna.ca. If you are concerned about how your personal information is used, you should check our websites periodically to obtain a current copy of this Privacy Policy. Your continued provision of personal information or use of our services following any changes to this Privacy Policy constitutes your acceptance of any such changes.



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Alterna refers to Alterna Savings and Credit Union Limited ("Alterna Savings") and its wholly owned subsidiary CS Alterna Bank ("Alterna Bank").