

**Your Privacy is Protected**



*Auto Workers Community*  
**Credit Union**

# Your Privacy is Protected

At AWCCU, an important part of our commitment to you is respect for your right to privacy. Credit Unions in Canada have a long history of respecting the rights of their member/owners. In 2004 your credit union's Board of Directors adopted the Credit Union Code for the Protection of Personal Information. The requirements of the CODE establish the credit union's operational use of personal information.

As a member you are entitled to review the Code at any time, access your personal information, or contact the Privacy Officer about a privacy issue or concern. Keeping your information and affairs in strict confidence is an integral part of our commitment to service excellence.

This brochure will assist you to better understand how AWCCU protects your personal information and the rights you have in terms of our collection, use and disclosure of your information.

## Definitions and Credit Union Code

The following definitions and ten interrelated privacy principles are derived from the CODE specified in the Personal Information Protection and Electronics Act, and form the basis of the CODE:

### Definitions

**"collection"** means the act of gathering, acquiring, or obtaining personal information from any source including third parties.

**"consent"** means voluntary agreement to the collection, use and disclosure of personal information for specified purposes. Consent may be express or implied. Express consent can be given orally or in writing, it is unequivocal and does not require any inference on the part of the credit union. Implied consent exists when the credit union can reasonably infer consent based upon your action or inaction.

**"disclosure"** means making personal information available to a third party.

**"personal information"** means information about an identifiable individual but does not include business contact information of an individual. Personal information does not include information that is about corporate or commercial entities. It also does not include information that cannot be associated with a specific individual.

**"PIPED"** means the Ontario Personal Information Protection and Electronic Documents Act 2000,c.5.

**"third party"** means an individual or organization other than, the credit union or member.

**"privacy officer"** means an individual designated by the credit union who is accountable for the credit union's compliance and who can be contacted as set out at the end of this brochure.

**"use"** means the treatment and handling of personal information by and within the credit union.

## Ten Inter-Related Privacy Principles

1. AWCCU is **accountable** for personal information under its control and have designated individuals who ensure compliance with the principles of the CODE;
2. The **purpose** for collecting personal information is identified at or before the time it is collected;
3. The 'knowledge' and **'consent'** of the member is required for the collection, use or disclosure of personal information, except where the credit union is authorized or required by PIPED Act or other law to do so without consent;
4. AWCCU will be **limited** to that which is necessary for the purposes identified by the credit union. Information will be **collected** by fair and lawful means, and not by misleading or deceiving members about the purpose for which information is being collected;
5. Personal information shall not be **used or disclosed** for purposes other than those for which it was collected, except with the consent of the Member or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes;
6. The Privacy Officer ensures that AWCCU has in place the appropriate guidelines and procedures so that when member data is collected or generated directly it is **accurate**, complete and up-to-date as is necessary;
7. Personal information shall be, protected by security **safeguards** appropriate to the sensitivity of the information;

8. Information is readily made available to the membership through the use of brochures located at the branches, *ATM* sites, information sheets, online Web information, and CU Views;
9. Upon request a member shall be informed of the existence, use and disclosure of their personal information, and shall be given access to that information. A member is entitled to question the accuracy and completeness of the information and have it amended as appropriate. All access requests must be submitted in writing and include adequate proof of the individual's identity or right to access, and sufficient information to allow the credit union to locate the requested information;
10. Any individual can challenge the credit union's compliance with any of the CODE principles. The Privacy Officer is accountable for the credit union's compliance and shall investigate all complaints. Accordingly, the privacy officer shall, be known to members.

## Why AWCCU Requires Your Personal Information

### What is personal information?

"Personal information" is information about you as an individual. This includes details such as your birth date, marital status, employment history, identification numbers, financial information and credit records.

When you become an AWCCU member, and whenever you apply for more products and services, the credit union asks for personal information about you so it can:

- provide and administer products and services requested and to use/disclose the information for any purpose related to the operation of accounts and the provision of requested products and services
- determine Member's financial situation including obtaining credit reports;
- provide the information to third party suppliers of products and services, such as data service providers, cheque printers, card manufacturers, etc;

- provide the information to credit bureaus and other financial institutions to update credit information;
- protect the credit union, member and others from fraud and error and to safeguard the financial interests of the credit union;
- authenticate member activity;
- provide information to anyone working with or for the credit union as needed for the operation of an account or the provision of requested products and services;
- collect debts owed to the credit union;
- manage or transfer assets or liabilities of the credit union, such as in the case of acquisitions and mergers, loans syndications and securitizations or sales of mortgages and;
- comply with legal and regulatory requirements.

### Other uses:

- the credit union may use the member's personal information to offer additional or alternative services to the member and may add it to client lists which they prepare and use for this purpose;
- the credit union may share personal information with authorized suppliers and agents which may offer their services to a member;
- the credit union may use a member's social insurance number as an aid to identify the member with credit bureaus and other financial institutions for credit history file matching purposes;
- the credit union may contact a member for survey purposes.

As you do business with AWCCU, personal information continues to be collected for our mutual protection. *For example, AWCCU may monitor and record your conversations with its telephone representatives to ensure service quality in order to confirm discussions with you.*

When personal information is collected directly from you AWCCU will advise as to how it will be used. Depending on the product or service requested, you will always be asked for your name, address, birth date, occupation, and identification for regulatory purposes.

Some information may be obtained from other sources with your consent (if required). *For example, AWCCU may verify some of the information given with your employer, or your references. When information is obtained from someone other than you, such as a credit bureau, the credit union records the source of that information, unless otherwise permitted or required by law.*

### **Different products and services require different types of information. For example:**

#### **Birth Date**

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

#### **Social Insurance Number (SIN)**

The 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 members with a similar name, including information we obtain with your consent through the credit approval process.

**Financial information** is used to assess your eligibility for credit products. *For example, mortgage or other types of loans.* It is also used to ensure that the advice we give you or the investments you purchase (in case of mutual funds or brokerage or investment accounts) are appropriate for you. 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 member and meet your financial needs.

**Health information** 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 the credit union's risks.

The health related information you provide in connection with an insurance product will only be shared with administrators, service providers and re-insurers of the insurance operations to process your insurance transactions.

## Consent

### ***Your information is collected, used or disclosed only with your consent***

When you apply for a product or service, AWCCU will provide you with information about its Privacy Practices and will obtain your consent. Depending on the product or service, this allows AWCCU to:

- Check your employment
- Obtain a credit report and exchange information with a credit bureau
- Offer you other products and services
- Send you information about products and services by means of direct marketing

### **There are many ways you can give consent**

Your expressed consent may be given in writing, verbally or through electronic means. Alternatively, where permitted by law, your consent may be implied through an action you have taken or when you continue to use a product or service after AWCCU notified you of a change.

#### **Examples of expressed consent:**

##### **Written**

Signing an application. Example: If you sign an application that states "I agree to the Terms and conditions within this document."

## Verbal

Responding to a direct question from a financial representative. Example: A financial representative asks, "to process your application, AWCCU requires your credit bureau information. Do you agree?"

## Electronic

Clicking on the "I agree" button online Example: If you apply for a product online, you may be asked to electronically acknowledge that you will be bound by legal terms and conditions or agree to certain statements. Clicking "I AGREE" is your electronic consent.

## Example of implied consent:

### Action you have taken

Use of products or services. *Example: If AWCCU offers you a Member Card with attached conditions and you are informed of those conditions, AWCCU can conclude that you agree to those conditions if you choose to use the Member Card.*

### Consent through an authorized representative

For example; a lawyer, agent or broker.

### Withdrawing Consent

The credit union will obtain a written request (signed and dated) from you should you seek to withdraw consent. The written request must acknowledge that you have been advised that the credit union may subsequently not be able to provide you with a related product, service or information that could be of value to you.

The withdrawal consent is subject to any legal or contractual restrictions that the credit union may have with you or other organizations such as: the Income Tax Act; credit reporting; or to fulfill other fiduciary and legal responsibilities.

### When AWCCU Releases Your Information

The credit union does not sell member lists or information to others. However, information is released in certain circumstances, which include:

- **With your consent**

On an ongoing basis, the credit union 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 credit history.

- **For servicing purposes**

The credit union will provide a limited amount of information only as necessary, without your consent, to our suppliers and agents (for example; cheque printers, membercard manufacturers, statement mailings and processing transactions) who provide goods and services to you through the credit union.

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

The credit union must give information in response to a valid demand, search warrant, or other legally valid enquiry or order. This may include legally valid requests from regulators and self-regulators who are responsible for ensuring that AWCCU is in compliance with applicable financial regulations (*i.e. The Office of the Superintendent of Financial Institutions and the Investment Dealers Association of Canada*).

## Safeguarding Your Personal Information

AWCCU uses a combination of security measures to safeguard your personal information.

In addition to the physical and electronic security devices AWCCU uses to protect your information, there are security standards in place to protect AWCCU's computer systems and your personal information from unauthorized use or access.

Personal information is protected by security safeguards appropriate to the sensitivity of the information. These safeguards protect personal information against loss or theft, as well as unauthorized access, use, copying, modification, disclosure or disposal. *For example, the systems have been designed to ensure that your Personal Identification Number (PIN), password and other access codes are always private and confidential. When you use your PIN at an automated banking machine, it is encrypted after you enter it. For your protection, your access codes are known only to you. Employees cannot gain access to them and they will not ask you to reveal them.*

AWCCU systems also protect your information when it is electronically transmitted, *for example, between our data processing centres and a branch or banking machine when you use your credit or debit card.*

Employees, Officers, and Directors, are required to review and sign the Credit Unions "Code of Conduct annually, including commitment to safeguard personal information.

If it is necessary to provide information in response to a legal inquiry or order, the credit union will ensure that the order is valid and only information will be disclosed that is legally required.

### **Destruction of Personal Information Safeguards**

The credit union disposes personal information in a secure manner to prevent any unauthorized access. This process is completed by following a retention and destruction policy.

### **E-Mail**

Confidentiality and security **are not assured** when information is transmitted through e-mail or other wireless communication. The credit union will not be responsible for any loss or damage suffered as a result of a breach of security and/or confidentiality when you transmit information to the credit union by e-mail or other wireless communication or when the credit union transmits such information by such means at your request.

AWCCU protects your privacy when sharing information for business transactions

The credit union audits their procedures and security measures regularly to ensure that they are being properly administered and that they remain effective and appropriate.

Your personal information is retained only as long as it is required for the reasons it was collected. The length of time information is retained depends on the product or service and the nature of the information. This period may extend beyond the end of your relationship with the credit union but only for as long as it is legally necessary for the credit union to have sufficient information to respond to any issue that may arise at a later date. When your information is no longer required for the purposes explained to you, it is then destroyed, deleted or erased.

## **What you can do to safeguard your privacy**

There are some simple yet very important steps you should take to protect your privacy.

### **Protect your Convenience Card, PIN and Password**

Your PIN (personal identification number) and passwords for online and telephone banking are the keys to your accounts. You are the only person who should know them. Never disclose your PIN or passwords to anyone or you could be liable for losses.

To protect your PIN, use your hand or body to shield your PIN from onlookers when you are conducting transactions at an ABM machine or at a Point of Sale.

### **Regularly monitor your account activities**

Promptly check your statements to verify all transactions have been properly recorded. If entries do not accurately reflect transaction activities (e.g. if there are missing or additional transactions), contact AWCCU immediately

### **Reduce your risk of identity theft**

- Don't give out personal information to unsolicited callers;
- Shred documents that contain personal or financial information before you throw them out;
- Request a copy of your credit bureau report periodically;
- Visit [www.safecanada.ca](http://www.safecanada.ca) and look for more identity theft information under the "Financial Safety" section

### **Make sure your contact information is up-to-date**

#### **Protect your privacy online**

To protect your privacy when banking online, a few steps you can take include clearing your browser's cache, using a firewall and protecting your computer from viruses and monitoring for spy ware.

As online privacy measures continue to evolve, we update the information on our web site. The Privacy and Security section of [www.awccu.com](http://www.awccu.com) can be reached through various links to other web sites. You will find answers to some of the most common questions you may have about online fraud ("phishing"), web site activity and steps you can take to protect your privacy online.

# Accuracy

AWCCU makes every effort to ensure the information in its records is as accurate and up-to-date as possible. This allows AWCCU to continue to offer the highest quality of service and to suggest products and services that best meet your needs.

You can help by keeping the credit union informed of any changes, such as when you move or change telephone numbers. If you find any errors in our information about you, let the credit union know and we will make the corrections immediately.

## **To update your address and other personal information:**

- Advise AWCCU via on-line banking or;
- By telephone to the branch where your account is held at 905-728-5187 or 1-800-268-8771 or;
- By written request to Auto Workers Community Credit Union, P.O. Box 158, 322 King St. W., Oshawa, Ontario L1H 7L1 or;
- Fax 905-728-8727.

# Openness

Information is readily made available to the membership through the use of brochures located at the branches, ATM sites, information sheets, online Web information, and CU Views.

# Individual Access

You have the right to access, verify, rectify and update your personal information.

Most of your information is in the form of your transaction records. These are available to you through your account statement updates, by visiting the branch, by accessing your account via on-line (Internet) banking, telephone banking (Interactive Voice Response IVR), the automated banking machines and brokerage services.

Depending on the nature of the information you are requesting and complexity of your request, AWCCU may ask you to put your request in writing. The response to a written request is within 30 days. This timeframe may be expanded only if required, and upon written notification to the Member.

Member information, such as copies of statements, transaction receipts, and account agreements will be provided upon request and authentication of identity.

There is no charge for verifying or correcting your information. However, the credit union may impose a fee at a stated hourly rate where collection of the requested information requires exceptional time and effort. The Member must be informed of an estimate of costs prior to the commencement of the request.

If you have a sensory disability, AWCCU will give you access to your personal information in any alternative format you request if we already have it in the format or if its conversion into that format is reasonable and necessary in order for you to be able to exercise your rights under applicable legislation.

## **Restricting Access**

In certain situations, the credit union may not be able to provide access to all the personal information it holds about a member. Exceptions to the access requirement will be limited and specific and include the following:

- Providing access would reveal personal information about a Third Party;
- The personal information to which the Member has requested access has been requested by a government institution for the purposes of enforcing the laws, carrying out an investigation related to the enforcement of any law, the administration of any law, the protection of national security and the defense of Canada or the conduct of international affairs;
- The information is protected by solicitor-client privilege;
- Providing access would reveal confidential commercial information
- Providing access might threaten the life or security of another individual;

- The information was collected without knowledge or consent for purposes related to investigating a breach of an agreement or a contravention of the laws of Canada or a province; or
- The information was generated in the course of a formal dispute resolution process.

**You can find out the source of information AWCCU collected**

If AWCCU has obtained information about you from other people, you can ask for the source of that information. If AWCCU obtained a credit report on you, you may have access to that information; it would have come from Equifax Canada, [www.equifax.ca](http://www.equifax.ca). Options to have access to your credit report are provided on their website.

## Challenging Compliance

**Resolving your concerns is important to AWCCU**

AWCCU is committed to treating you with the greatest respect, consideration, and service excellence. However, from time to time something may go wrong. There may be a misunderstanding or you may feel you have been dealt with unjustly. Whatever the circumstances, our primary concern is ensuring your concerns are addressed and your problem is resolved.

It may not be appropriate for AWCCU to release certain information directly to you. There may be records that include information about you and other individuals, or that have information confidential to AWCCU or are the property of AWCCU. It is important that AWCCU protect everyone’s confidentiality and legal rights.

You can challenge the credit union’s compliance with any of the CODE principles with the Privacy Officer

**How to resolve concerns and complaints at AWCCU**

**Talk to AWCCU**

Most complaints are resolved by simply speaking to an AWCCU representative by telephone at 905-728-5187 or 1-800-268-8771.

**Inquiry and Complaint Handling Process**

Inquiries and complaints must be in writing, with a formal process in place to receive and track them and the Credit Union must respond as quickly as possible within 30 days.

**Required Measures for Justified Complaints**

The Privacy Officer ensures appropriate measures are taken when a complaint is found to be justified. These measures include:

- Written response to the complainant within the specified timeframe of 30 days;
- Revision of the challenged personal information;
- If required, revision to policies and procedures;
- Review of any complaint that requires disciplinary action against a Credit Union Employee with the appropriate Manager(s);
- Reporting of the non-compliance to the Board of Directors, including the actions proposed or taken to resolve the issue.



At AWCCU, an important part of our commitment to you is respect for your right to privacy.

**Contact Information for  
AWCCU Privacy Officer**

Privacy Officer  
Auto Workers Community Credit Union  
P.O. Box 158  
Oshawa, Ontario  
L1H 7L1

**1-800-268-8771 or 905-728-5187**

If AWCCU is unsuccessful at resolving your concern or complaint, you may contact:

The Office of the  
Privacy Commissioner of Canada  
Place de Ville  
112 Kent Street, 3rd Floor  
Ottawa, Ontario  
K1A 1H3

**Toll free 1-800-282-1376**

**[www.privcom.gc.ca](http://www.privcom.gc.ca)**



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