

## **Our Commitment to Privacy**

At Bancorp Financial Services Inc. we respect your privacy and the confidentiality of your personal information. We are committed to keeping the personal information you share with us confidential. The use of such information will only be for the purpose for which it was collected. This Privacy Policy explains how Bancorp Financial Services Inc. and its affiliated companies collect, use, disclose and protect the personal information we obtain. References to “Bancorp” are to the corporate entity Bancorp Financial Services Inc. and include its subsidiaries and affiliates, depending upon the context.

## **What is Personal Information?**

Personal information is any information about you as an identifiable individual and includes information with respect to your name, address, age, gender, income, marital status, finances, employment and web site use information, together with your personal references and identification numbers (such as a social insurance number).

## **Important Principles For Your Protection**

Our Privacy Policy applies to individuals, including individuals carrying on business alone or in partnership with other individuals. It consists of the following key principles:

## **Collecting and Using Personal Information**

We will limit the personal information we collect to what we need for those purposes of the service being provided, and we will use it only for those purposes. We will obtain your consent if we wish to use your personal information for any other purpose or before collecting personal information from, or providing personal information to, parties not affiliated with Bancorp.

## **Disclosing Personal Information**

We may provide your personal information to other persons, but only where we have your consent or where we are required or permitted to do so by law.

## **Protecting Personal Information**

We will protect the personal information we obtain about you with appropriate safeguards and security measures. We will retain your personal information only for the time it is required for the purposes we explain or as otherwise required by law.

## **Access to and Accuracy of Your Personal Information**

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

## **Accountability and Openness to Your Privacy Concerns**

We will explain your options of refusing or withdrawing consent to the collection, use and release of your personal 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 personal information. The following sections will answer most of the important questions that you may have about how we fulfill each of these important principles, and how we will hold ourselves accessible and accountable to you.

## **Why We Ask for Your Personal Information**

We ask you for information to establish and serve you as our client. Personal information obtained from you will be used by Bancorp to protect and administer your accounts, records and funds; to comply with certain laws, regulations and regulatory policies; to help Bancorp improve products and services offered to you. The information we ask for depends on the products or services your request and in most cases are required by law or the policies of the regulatory organizations to which we are subject. Your social insurance number, for example, is required for products that earn investment income, in order to comply with the Canada Customs and Revenue Agency’s income reporting requirements.

With your consent we may share your personal information, where not prohibited by law, within the Bancorp group of companies for the purposes of showing products or services to you. Sharing such information will help us serve you better and determine whether any products or services we provide through our affiliated companies are suitable for you. Sharing your personal information also helps us determine your financial needs because it allows us to review what products of Bancorp you have and how you use them. We may use certain information to provide you with information about Bancorp and its products and services. This consent is optional and you can decide to withdraw it at any time. Please refer to the Understanding Your Options section.

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 personal information. If we wish in the future to use it for another purpose, we will ask you for your consent at that time. 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 Collect Personal Information About You**

We obtain most of our information about you directly from you. With your consent, we may obtain personal information about you from third parties. Obtaining additional personal information about you from parties outside Bancorp helps us assess your eligibility for our products and services. For credit, for example, we may need to know your creditworthiness. We may contact references you have provided or credit reporting agencies to verify information that you have given us or to give us information on your credit history. 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 provide the particular product or service you have requested.

## **Privacy on the Internet**

We recognize that you may have special privacy concerns regarding our services provided on the Internet. In particular, we will want to ensure that your personal information is secure and that you are aware of and can control our use of your personal information in the Internet environment.

Remember email over the Internet is generally unencrypted. We recommend that you do not send us sensitive or confidential information by ordinary email, as unencrypted email is generally not secure. We are equally concerned about your privacy on the Internet and this Privacy Policy applies in its entirety to anything you might do while visiting our Web site.

Bancorp Web site does not use “cookies”. You may choose to disable the “cookies” option on your browser; without affecting your use of our Web site.

## **When We Release Your Personal Information**

Under no circumstances do we sell client lists or personal information to others. We release your personal information to parties outside Bancorp only under the following circumstances.

### **With Your Consent**

We will disclose your personal information with your prior consent.

### **When Required or Permitted by Law**

In certain circumstances, the law may require or permit Bancorp to disclose your personal information without your knowledge or specific consent. For example, such information may be disclosed if required to comply with a subpoena, warrant, or court order, or if requested by a government institution which has the lawful authority to obtain the information.

### **For Regulatory Purposes**

From time to time we may disclose your personal information to securities regulatory and oversight organizations to which Bancorp is subject for the purposes of an audit or investigation relating to your relationship with Bancorp or Bancorp's business generally.

### **Protection of Public Interest**

We may disclose information to the authorities to serve a clear public interest and fulfill our public duty – such as to protect against fraud, money laundering or other criminal activity.

In exceptional circumstances it may be necessary that we disclose your personally identifiable information if we believe, in good faith, that disclosure is otherwise necessary or advisable to protect Bancorp's interests. We will seek to ensure that any proposed disclosure is required in the circumstances and then ensure that we disclose only the information that is required.

### **Understanding Your Options**

We will explain your options of refusing or withdrawing consent to the collection, use or release of your personal information and any consequences of refusing or withdrawing your consent. You may do so by advising Bancorp's Privacy Officer in writing.

### **How We Protect Your Information**

We will protect your personal information with appropriate safeguards and security measures. We have security standards to protect our systems and your personal information against unauthorized access and use. We use our best efforts to ensure our suppliers and agents, as part of their contracts with Bancorp, are bound to maintain your confidentiality and may not use the information they obtain 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 Bancorp are familiar with the procedures that must be taken to safeguard customer information. And to us, protecting the confidentiality of your personal information is part of our jobs. We audit our procedures and security measures regularly to ensure that they are being properly administered and that they remain effective and appropriate.

We retain your personal information only as long as it is required for the reasons it was collected or as required by law. 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 legally necessary for us to have sufficient information to respond to any issue that may arise at a later date. When your personal information is no longer needed or required, 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. Most of this information is in the form of your transaction records which can be obtained by contacting the Bancorp Privacy Officer in writing at our head office address: Suite 1420 – 1090 West Georgia Street, Vancouver, British Columbia, V6E 3V7.

We may not be able to provide information about you from our records if it contains references to other persons, is subject to legal privilege, contains information proprietary to Bancorp or cannot be disclosed for other legal reasons. If you have any questions regarding decisions made, we will tell you the reasons for those decisions.

### **Keeping Your Information Accurate**

We will make every reasonable effort to keep your personal information accurate and up-to-date. Having accurate information about you enables us to give you the best possible service. 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 as soon as reasonably possible 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.

### **Your Concerns Matter to Us**

Your comments and concerns are important to Bancorp. If you have any concerns or questions about privacy and confidentiality, or any concerns about the way a request for information was handled, you can contact Bancorp's Privacy Officer in writing at our head office address – Suite 1420 – 1090 West Georgia Street, Vancouver, British Columbia, V6E 3V7, by telephone at 604-608-2717 or by facsimile at 604-609-7107.

## **Protecting Your Privacy**



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