Scotiabank

Scotiabank Privacy Agreement

Your privacy matters to us. At Scotiabank, we know your personal information is important. We respect the trust you place in us to protect it. This Privacy Agreement applies to clients, prospective clients, and individuals whose personal information we handle.

We want to be clear about how we handle your personal information. This Privacy Agreement and our Digital Privacy and Interest-Based Advertising Policy explain why we collect and use it, how we share, protect, and keep it, and what choices and rights you have.

If you apply for a product or service that requires additional explanation on how we handle your information, we will provide that to you.

This Privacy Agreement (Agreement) explains:

- **What** personal information we collect
- **Why** we collect and use it
- **Who** we share it with
- **How** we protect and store it
- The **choices and rights** you have

The Digital Privacy and Interest-Based Advertising Policy provides more details and how we handle your information online.

In this Agreement, '**Scotiabank'**, '**we'**, and **'us'** mean The Bank of Nova Scotia and the Scotiabank group of companies or any Scotiabank programs in Canada ("Scotiabank" or "we" or "us"). Some of our affiliates and subsidiaries have their own privacy policies. Where they do not, this Privacy Agreement applies to them.

Our Privacy Program

We have a dedicated privacy program that establishes accountability for the responsible handling of personal information and meeting privacy requirements. The Privacy Office, led by our Global Privacy Officer, oversees our privacy program. You can reach our Global Privacy Officer using the contact details at the end of this Agreement.

What is Personal Information?

"Personal information" is information that can identify you. This includes:

- Your name, address, email, phone number, and other contact details.
- Technical information, like your IP address, device, and how you use our website or app (but only if it can identify you).
- Details about how you use our products and services like payments and transactions.

Information that has been anonymized and cannot be linked back to you is not personal information.

Why We Collect and Use Your Personal Information

We collect and use personal information for these main reasons:

To set up and manage our banking relationship

We use your information to help open and manage your accounts; provide the products and services you asked for, and maintain our relationship with you.

- **To confirm who you are:** We may ask for your name, address, phone number, email address, date of birth, and an ID or other documents like a utility bill. With your consent, we may use your voiceprint to authenticate you and prevent fraud when you call us. We may also ask you to take a live selfie and use facial comparison technology to compare your ID with the selfie. We will delete information from the facial comparison process after 90 days, unless fraud is detected. Only a few authorized people can access this information, and it is protected by strong security measures like encryption. Consenting to the use of biometrics is optional.

  We may ask for your Social Insurance Number (SIN) to accurately verify your identity with credit reporting agencies. Giving us your SIN for this purpose is optional. You can withdraw this consent at any time. See **"How to Refuse or Withdraw your Consent"** below.

  We may also need information about your spouse, legal guardian, beneficiaries or personal representatives to manage your account. For business clients, we also collect the names and details of signing officers.

- **To assess your eligibility and suitability for our products and services:** We may ask about your financial situation. This can include your credit and payment history, education, job, income, assets, debts, and other liabilities. We may also ask how you will use the product or service and where funds are coming from. If you agree to be a guarantor, we will also ask for this information.

- **To communicate with you:** We communicate with you in person, by phone, mail, or through digital channels. We use these channels to share information about your products and services, or to collect a debt. You can choose to stop receiving certain communications from us, but we may still contact you if required by law or to collect a debt.

- **To obtain credit information:** We get credit information from credit reporting agencies throughout our relationship. We use it to review applications, verify your identity, check your credit, and update our records. We also use it to see if you qualify for other products and services, manage risk, and help you use credit responsibly. This may include pre-approved credit offers, credit limit increases and balance transfer offers. The information we get includes the type and amount of credit you have received, payment history, collection activity, legal proceedings, bankruptcies, and other information reported by your creditors. Your consent stays in effect as long as you have the product or service with us.

  You can contact the credit reporting agencies we use to access or correct your credit report:
  - **Equifax Canada Inc**: http://www.equifax.ca
  - **TransUnion Canada Inc** http://www.transunion.ca

- **To provide insurance services:** If you apply for insurance through us, we and our insurance providers collect additional information to assess risk, set up coverage, manage your policy and assess claims. For some insurance products and services, we may ask for health-related information.

To personalize your experience

We use your information to make your experience with us more relevant when providing or offering you products and services.

- **Personalized experiences:** We analyze and use your information to improve your interactions with our branches, websites, and mobile apps, and send you offers and messages that are relevant to you.

- **Marketing messages:** We may contact you about offers and promotions by phone, mail, or through digital channels. We customize these based on information we have about you. You can opt out of marketing messages at any time.

- **Messages from Scotiabank Group of Companies:** If you subscribe to electronic messages from the Scotiabank group of companies, each may send you information about their products, services, offers, events, and other valuable information. We may also send you information about products and services from our trusted partners.

- **Social media:** If you interact with us on social media platforms, we may collect information such as comments or direct messages. The information we receive depends on your privacy settings on those platforms. We encourage you to review their privacy policies.

- **Online advertising:** We use third-party platforms to show you relevant Scotiabank ads. To do this, we may give the platform your de-identified email address or phone number. To opt-out of the use of your information for these purposes, see **"How to Update your Marketing Choices"** below.

- **Contests, surveys, and promotions:** If you enter a contest, survey, or promotion, we collect your name, contact details, and any responses you provide. We use this to manage your entry and for the purposes explained at the time you enter. Survey results are used in combined form (aggregated) unless you give us permission to use them differently. If a third party runs the contest, we may share your information with them as explained at the time of entry.

To manage our business

We use personal information to run our operations and protect you and others.

- **Preventing fraud, criminal activity and protecting our premises:** We collect and use personal information to help prevent and detect fraud and other harmful activity and to improve these efforts. This information may be collected directly from you, or from trusted third parties (including credit reporting agencies, regulators and law enforcement, financial institutions, payment networks, service providers, and other intermediaries). We may request additional information to investigate matters, settle any claim or report a matter to the appropriate authorities. We also use video surveillance in and around branches, bank machines and other locations to keep our clients and employees safe.

- **When you contact us:** We record phone calls and virtual meetings for quality, verification and to improve your experience. When required, we will notify you that a call or meeting is being recorded.

- **Collecting debts and managing risk:** We use information to collect debts, enforce obligations, and assess risk.

- **Business relationships:** We collect personal information from employees or representatives of our suppliers and contractors so they can do business with us.

- **Analysis and improvement:** We analyze the information we collect to better understand our clients, improve our products and services, and to prevent and detect fraud.

To meet legal and regulatory requirements

The law requires us to collect and use certain personal information. For example:

- We collect information for anti-money laundering and "know your client" rules and other applicable legal or regulatory requirements.

- We collect, use and share your SIN for income tax reporting and other purposes required by law.

How We Use Automated Decision-Making

We may use automated tools to analyze your personal information and make decisions. For example, we use automated tools for credit decisions, identity verification, fraud detection, and eligibility for products and services. We may also use automated decisions to prevent financial crime, or to treat clients fairly. If an automated decision has a significant impact on you, you can request information about how an automated decision was made and ask that it be reviewed.

Who We Share Your Personal Information With

We share your personal information for the purposes described below.

- **Fraud prevention and security partners:** We may share personal information with trusted third parties (including service providers, financial institutions, payment networks, and other parties who help provide services) to help detect and prevent fraud and other harmful activity. Some of these partners use tools that analyze information from multiple organizations to identify patterns of fraud. This means we may provide your information to these partners, and they may use information from other organizations to help protect you and us. We and these partners may also use this information to improve fraud detection and security measures.

- **Payment Card Networks (e.g., Visa, Mastercard):** Your information may be shared with and otherwise collected and used by payment card networks and associations for the purposes of processing card transactions, administering the payment card system, developing or supporting your products and services with us, and detecting and preventing fraud. Payment card networks may also use your information to develop and enhance their own products, services, and technologies, and for internal analysis and the generation of statistics. We may also share information with merchants with whom you have set up pre-authorized or automatic bill payments, in which case we may provide your updated payment card number or expiry date.

- **Within the Scotiabank Group of Companies:** Other Scotiabank companies may provide operational, administrative, and support services on our behalf to meet legal and regulatory obligations, prevent fraud, and perform analytics. We may share information with them for these purposes. Some of these companies may operate outside of your province or outside of Canada and may access and process your personal information. In those cases, your information may be subject to laws of those jurisdictions. For the most up to date list of our main affiliates and subsidiaries, see our latest Annual Report.

  We may share your information with other Scotiabank companies so they can send you marketing offers or help you with your credit. You can opt-out of this sharing at any time. See **"How to Update your Marketing Choices"**

below.

- **With our service providers**: We use trusted third-party service providers such as technology providers, legal advisors, auditors, consultants, and other professional service firms to help us operate our business and meet our legal and regulatory obligations. For example, we use them for things like printing, mail, marketing, advertising, data analysis, customer service, transaction processing and fraud detection and prevention. We require service providers to protect your information in a comparable way to how we would.
- **With loyalty, rewards, or program partners:** We offer products and services with trusted business partners, such as through SCENE+ or car dealers or manufacturers as part of our automotive financing business. If we collect, use or share your information in connection with a partner program, we will tell you when you sign up and you can refer to that program's terms for details.

- **With other trusted business partners:** If you subscribe to receive messages from our partners, we share your information so that they can contact you. You can opt-out at any time. See **"How to Update your Marketing Choices"** below.

- **With credit reporting agencies:** We exchange information with credit reporting agencies on an ongoing basis, including information about your products, late payments, missed payments, or other defaults.

- **With joint account holders, representatives, executors and beneficiaries:** We share your information with joint account holders or authorized representatives, such as a legal guardian or power of attorney. Joint account holders will each have access to all account history and transaction details for the account. We also share information with estate representatives or beneficiaries when reasonably necessary to administer an estate.

- **In connection with a business transaction:** If we are selling a company or a portion of our business, or if we sell, assign or package your loan, mortgage or other debt, we may share information with the prospective purchaser or investor.

- **To meet legal requirements:** Scotiabank and our service providers (in Canada, the United States, and abroad) may share personal information when we are required or permitted by law. This includes:
    - Investigating a breach of an agreement or law, or detecting and preventing fraud
    - Establishing, exercising, or defending legal claims
    - Protecting the rights, property, and safety of Scotiabank and others
    - Responding to a court order, search warrant, or other valid legal demand
    - Complying with court rules or production orders
    - Meeting legal, regulatory, or self-regulatory requirements

- **For mortgage and insurance products:**
    - Mortgages: We may share your information, including credit details and mortgage amount, with mortgage insurers, or with a creditor if you are in default.
    - Insurance: We exchange information, including health-related information, with hospitals and health care professionals, government insurance plans, other insurance companies, and insurance service bureaus.

- **We may share information in accordance with your requests:** In some cases, your consent may be implied, meaning your agreement is assumed based on your action or inaction. For example, when you provide your information to open an account, we consider that you have agreed to its use for that purpose. You may withdraw your consent at any time. See **"How to Refuse or Withdraw your Consent"** below.

How We Protect and Keep Your Information

We have security measures in place to protect your personal information against loss, theft, and unauthorized access, use, or disclosure.

- We limit access to your information to employees and authorized service providers who need it to do their job.

- We keep your information for as long as it is needed for the purposes described in this Agreement or to meet our legal obligations, even if you are no longer a client. For example, we typically keep your account records for at least seven years after you close your account, or as otherwise required by law. You may request that we delete your personal information where permitted by law. We may not be able to delete information where we are required to retain it. When you start an application online, your progress is typically saved as a draft for 90 days, so you can pick up where you left off.

How We Keep Your Information Accurate

We need your information to be accurate, complete, and up to date. We take steps to keep your information accurate and complete and up to date. If any of your information changes, please let us know using the contact details below so we can update our records.

How to Refuse or Withdraw Your Consent

You have the right to refuse or withdraw your consent to our collection, use, or sharing of your personal information at any time, by giving us reasonable notice, in most cases. This includes consent for us to use your SIN to verify your identity.

To withdraw consent, contact the branch or office you deal with, or by calling us toll-free.

Scotiabank **1-800-4SCOTIA**

ScotiaMcLeod, Scotiatrust and Private Investment Counsel **1-866-437-4990**

Scotia Wealth Insurance Services **1-800-986-5458**

Scotia Insurance **1-866-725-0428**

Scotia iTRADE® **1-888-872-3388**

You can also contact the Escalated Client Concerns Office (See **"How to Contact Us"** below).

Please note:

- Withdrawing consent could mean we are unable to provide or continue certain products and services.
- In some cases, the law, regulations, or a contract can require us to collect, use, or share your personal information, and you cannot withdraw your consent. For example, while you have a loan with us, you cannot withdraw your consent for us to collect, use and share information related to that loan.
- You also cannot refuse consent to our handling of information required by our regulators.
- We will act on your request as quickly as possible, but some uses of your information cannot be stopped immediately.

How to Update your Marketing Choices

You can change your marketing preferences at any time by contacting the branch or office you deal with or by calling **1-800-4SCOTIA.**

Here are more specific ways to opt-out:

- **Email:** Select the "unsubscribe" link in any of our emails or visit the unsubscribe pages for **The Bank of Nova Scotia in Canada** or **here** for Scotiabank Global Wealth Management senders.
- **Text messages (SMS):** Reply "STOP" to any message (standard SMS charges may apply).
- **Push notifications:** Adjust your settings on your device, in our mobile app, or through Scotia OnLine (we may still send alerts required by regulation).
- **Interest-based advertising:** See our Digital Privacy and Interest-Based Advertising Policy.
- **Sharing with partners or Scotiabank companies:** Contact us using the phone number listed above.
- **Direct mail and phone marketing:** Contact us using the phone number listed above.

Even after you opt out, you may still receive messages from us, for example, replies to your questions, legally required notices, debt collection messages. If you visit a branch, call us, or use an ATM, we may still make certain offers to you.

How to Access or Update Your Personal Information

You can ask to access or update the personal information we hold about you. Much of it is already available through your account statements, online banking, your branch, office or the Client Contact Centre.

For other requests, please send a written request to the Escalated Customer Concerns Office using the contact information at the end of this Agreement.

- We will ask you to confirm your identity and clarify your request, including the dates and account you're asking about.
- In some cases, we may not be able to provide access, for example, if you request information that we consider confidential or we are otherwise prohibited from sharing.
- There may be a small fee depending on your request. We will tell you before proceeding.
- If you have a sensory disability, you can ask for your information in an alternative format.

How We Notify You of Changes

We may update this Agreement from time to time. When we do, we will post the updated version on our website and make it available through our app and branches. If we make important changes, we will let you know via email, on our app, or on your monthly statement.

Policies & Procedures Regarding Personal Information

We are committed to protecting your personal information. We have policies and practices that explain our treatment of personal information, including:

- A privacy framework that explains the roles and responsibilities of our personnel with respect to the handling of personal information in our custody and control;
- Processes for answering questions, requests and complaints about our handling of personal information;

- Practices for keeping personal information only as long as needed, for the purposes set out in this Privacy Agreement or as required to meet legal or business requirements;

- A governance framework for the protection of personal information, including administrative, technical and physical security measures designed to protect personal information in our custody and control against loss, theft and unauthorized access, use, modification and disclosure;

- An incident response plan;

- Controls intended to limit access to personal information on a need-to-know basis to personnel who require access to fulfil their job requirements;

- Training of personnel on the appropriate handling of personal information;

- The designation of a Global Privacy Officer who is responsible for overseeing our compliance with applicable privacy laws.

How to Contact Us

If you have questions about Scotiabank's privacy practices or how we handle your personal information, please contact the branch or office you work with or call us toll-free at **1-800-472-6842**.

If they cannot resolve your concern, contact the Privacy Office c/o the Escalated Customer Concerns Office using one of the following methods:

Phone: 1-877-700-0043

Email: escalatedconcerns@scotiabank.com

Letter: Privacy Office c/o the Escalated Customer Concerns Office
Scotiabank 44 King Street West
Toronto ON M5H 1H1

We have procedures to receive, investigate, and respond to privacy complaints. We will investigate all complaints and, if justified, work to resolve them.

If you are still not satisfied, you can file a complaint with the Office of the Privacy Commissioner of Canada:

30, Victoria Street Gatineau, Quebec, K1A 1H3Toll-free: **1-800-282-1376**
Phone: **(819) 994-5444**
TTY: **(819) 994-6591**
www.priv.gc.ca

Language

Quebec Residents Only / Résidents du Québec seulement: You acknowledge that the French and English versions of this Agreement were remitted to you. You expressly request and agree to be bound exclusively by the English version of this Agreement and that all related documents, including any notices, be drafted in English only.

Vous reconnaissez que les versions française et anglaise de cette convention vous ont été remises. Vous demandez et acceptez expressément d'être lié exclusivement par la version anglaise de cette convention et que tous les documents qui s'y rattachent, y compris tous avis, soient rédigés en anglais seulement.