

# **PRIVACY STATEMENT**

The Effort Trust Company and its divisions (collectively referred to as “Effort Trust”, “we”, “us”, “our” throughout) are committed to keeping your personal information private, secure, and accurate. We have developed this Privacy Statement to outline how we govern the collection, use, and disclosure of personal information in a manner that recognizes your right to privacy, as well as the requirement for Effort Trust to collect, use, or disclose personal information for its business purposes. This privacy statement applies to the operations of Effort Trust, both in the branch or office, online and via email, and also by telephone.

## ***What Is Personal Information?***

Personal information means personal, financial, and other details about you, that we have collected from you or obtained from others (within or outside our organization), including through the products and services you use. This information may include details such as:

- Name and contact information
- Residential address
- Date of birth
- Identification numbers (for example, your social insurance number or driver’s license number)
- Personal financial records including details about your income, assets, and liabilities
- Credit scores and credit history
- Video surveillance images collected by our security system
- Information collected by our websites

We may verify your personal information both before and after you obtain a product or service from us.

## ***How We Handle Your Information***

Effort Trust has a strict privacy policy that governs how we handle your personal information. We are responsible for all personal information in our possession, custody or control, including the information we disclose to our third party service providers during the course of our day-to-day operations. Effort Trust has designated a Chief Privacy Officer who oversees the implementation of this Privacy Statement. To contact the Office of the Chief Privacy Officer, please see the “Contact Us” section below.

## ***How We Use Your Personal Information***

There are a variety of reasons why we collect and use your personal information. When you apply for, or provide a guarantee in respect of, any of our financial products or services, and while you are our customer, we may collect and use your information for purposes such as:

- Verifying your identity and protecting against fraud and other illegal activities
- Understanding your financial service needs and providing ongoing service to you
- Determining the suitability of our products and services for you
- Determining your eligibility for our products and services
- Informing you about other products and services that may meet your needs
- Evaluating your current and ongoing creditworthiness, and maintaining your credit history

- Complying with legal, regulatory, and contractual requirements
- Physical security of our offices and branches

We aim to only collect information that is required in order to fulfill our business purposes.

We will only use your information for the purposes for which it has been collected. If any new purpose for using your information arises, we will contact you to obtain your permission prior to using your information.

### ***Disclosure of Your Information***

In connection with your application for a product or service, as well as the ongoing administration and servicing of that product or service, we may share and exchange credit and other information about you with others, including:

- Consumer credit reporting agencies
- Mortgage insurers or creditor insurers
- Third party processors providing administrative services to our branches and offices (such as printing services)
- Originating brokers
- Real estate appraisers and lawyers
- Your employer
- Public registries, public databases, and private databases
- Any other person as may be permitted or required by law

### ***Refusing or Withdrawing Consent***

When applying for or accepting a new product or service from us, we obtain your consent to collect, use, or disclose your personal information. Subject to legal, regulatory, and contractual requirements, you may be able to refuse to consent to our collection, use, or disclosure of your personal information, or withdraw consent you previously granted. If you wish to request the withdrawal of your consent for the collection of your information, you may do so at any time by contacting the branch or office with which you are dealing.

Please note that you cannot withdraw your consent to the collection, use, and disclosure of your personal information if:

- We are legally required to collect, use, or disclose your personal information, or
- It relates to a credit product we have granted to you where we are required to collect and exchange your personal information on an ongoing basis with mortgage insurers and other lenders

Depending on the circumstances, withdrawing your consent may mean that we are unable to provide you with the products or services you request.

### ***Retention of Your Information***

We will only retain personal information for as long as we believe it necessary to fulfil the purpose for which it was collected and to fulfil legal or business retention requirements. This may include

customer service, legal, or regulatory needs that require us to keep your personal information beyond the end of your relationship with us.

### ***How to Access Your Personal Information***

If you want to access any personal information we hold about you, or to find out how your information has been disclosed, you may submit a written or email request to your branch or office.

We endeavor to ensure that all personal information that we hold is accurate. If you discover an error or inaccuracy related to your personal information, please submit a written or email request to your branch to request that a correction be made, or that specific information be deleted. We will review your request and provide you with a response within 30 days of receiving your request.

If we are unable to update your information or provide you with some of the information that you are requesting, we will provide you with the reason why we are unable to accommodate your request.

### ***Protecting Your Personal Information***

Effort Trust endeavors to maintain adequate physical, procedural, and technical security with respect to its offices and information storage facilities to prevent any loss, misuse, unauthorized access, disclosure, or modification of personal information.

Authorized employees, agents, service providers, administrators, and mandataries will have access to your personal information in order to perform their job functions.

If we share your personal information with service providers, they will be bound by appropriate agreements with Effort Trust, holding them to appropriate privacy standards.

### ***Protecting Your Digital Information***

We take the privacy and protection of your digital information very seriously and ensure that all of our staff receive regular cybersecurity training to promote awareness and safe practices when using email and the Internet.

We encourage our clients to adopt and follow similar practices for their own protection. The website [www.getcybersafe.ca](http://www.getcybersafe.ca) provides a reliable source of information intended to promote cybersecurity awareness across a range of topics.

### ***Other Important Information***

We may make changes to this Privacy Statement from time to time. We encourage you to review our Privacy Statement whenever you interact with us to stay informed about our current information privacy practices. If you have any questions about our Privacy statement, please see the "Contact Us" section below.

### ***Third Party Websites or Links***

Effort Trust websites may contain links to other websites. Effort Trust is not responsible for the information and privacy practices of these third-party websites.

### ***Contact Us***

The security and confidentiality of your personal information is a high priority for Effort Trust. We hope that this Privacy Statement is informative and useful to you. If you have any concerns regarding this Privacy Statement or have any further questions, you may bring them to our attention as follows:

#### **Chief Privacy Officer**

The Effort Trust Company  
980 Yonge Street, Suite 30  
Toronto, Ontario  
M4W 3V8  
Email: [cpo@efforttrust.com](mailto:cpo@efforttrust.com)

If your concern remains unresolved by the Chief Privacy Officer, you may contact the Office of the Privacy Commissioner of Canada (OPC). The OPC oversees compliance with the Personal Information Protection and Electronic Documents Act (PIPEDA), Canada's private sector privacy law. You have the right to complain at any time to the OPC about any alleged mishandling of your personal information under PIPEDA. The contact information for the OPC is as follows:

#### **Office of the Privacy Commissioner of Canada**

3rd Floor, Place de Ville  
112 Kent Street  
Ottawa, Ontario  
K1A 1H3  
Phone: 1-800-282-1376  
Visit: [www.priv.gc.ca](http://www.priv.gc.ca)