

Laurentian Bank Privacy Statement

Last Updated: September 22, 2023

1. Introduction

At Laurentian Bank ¹ we respect your privacy, and we are committed to protecting any personal information you entrust us with. For us, that is just part of doing business.

Our privacy statement describes how we protect your privacy and the confidentiality of your personal information. It applies to all our dealings with you as well as to the collection, use or disclosure of personal information.

This statement explains how Laurentian Bank collects and keeps this information secure. We want you to know how we manage this information to serve you and that you have choices about how it is used and shared. It further explains how you can contact us if you have a question about or want to make a change to any personal information that Laurentian Bank has collected about you. We strongly recommend that you take the time to read this Privacy Statement and retain it for future reference.

Your personal information is information that identifies you or can be used to identify you, alone or in combination with other information. This may include, for example, your name, address, government issued identification numbers, financial account numbers, credit and payment history, income, age and gender.

In this statement, Laurentian Bank refers to Laurentian Bank of Canada and all of its' affiliates that provide deposit, credit, investment, loan, securities, trust, insurance and other products and services in Canada.

2. Personal Information We Collect and How We Collect It

We only collect the personal information we need for the purposes explained to you in Section 3 below. We may ask for your personal information when you begin a relationship with us and during the course of our relationship. We may also collect your personal information when you interact with us by visiting any of our branches or places of business, using our website or calling us. We collect personal information in three ways: directly from you, through automated means, and from third parties or other sources.

Here are some examples of personal information we may collect:

- Identification information, such as your name, date of birth, gender, marital status, residency status and signature;
- Contact information, such as your phone number, email address or residential address;
- Account information, such as your Personal identification number (PIN), account number, account balances, passwords and service preferences;
- Financial information such as your income, personal financial and transaction records, credit history and other information related to your financial standing;
- Health information;
- Biometric information, such as fingerprints, voiceprints or facial recognition data, which may be used for security and authentication purposes, but only with your prior consent and as permitted by applicable law. This includes any biometric templates derived from such raw data that may be used for subsequent comparison or matching;
- Employment information, including your employer's name, employment history, position, income and other related information; and
- Other information you provide to us originating from inquiries or online application forms. For example, when you e-mail us, any information you include in the e-mail.

We may also ask for your social insurance number (SIN). We are required to request your SIN for reporting information to the Canada Revenue Agency. If we ask for your SIN for other purposes, you may choose not to provide it to us.

Directly from You

We collect most of your personal information directly from you, for example, when you open an account, apply for a product or service, make a transaction, visit our website, respond to our emails, participate in our surveys or promotions, contact our customer service, sign up for newsletters or marketing communications or otherwise communicate with us.

Through Automated Means

When you browse our websites or access our online services, we or our partners may use automated technologies, such as cookies, to collect information about your interaction with our websites. A “cookie” is a small piece of data placed on your computer by a web browser (e.g. Chrome, Safari or Firefox) when visiting certain websites. In general, these technologies collect the following information:

- Online usage information, such as the pages you visited, downloaded content and the address of the websites that you visited immediately before coming to our websites;
- Device information, including device model, operating system, browser type, IP address and approximate geographical location based on your IP address;
- Login IDs and passwords to access our online services; and
- Setting preferences, in particular to personalize your online experience with us.

For more information about how we use these technologies and how you can control your settings, please refer to our [Cookie Policy](#).

When you communicate with our customer service representatives or engage in transactions over the phone, we may record our telephone conversations with you to confirm our discussions and agreements with you and for quality control purposes. If you prefer not to have your calls recorded, you may transact business through an alternate channel where the service is available, such as our branches, at the office location where you obtain our services or through online banking or banking machines.

You might also be subject to video surveillance for security purposes, when you visit our branches, office locations and banking machines. These measures are taken to maintain the safety of our clients, employees and others, and to detect and prevent fraud and unauthorized or illegal activities.

From Third Parties or Other Sources

We may also collect information about you from publicly or commercially available sources or from third parties, with your consent or as otherwise permitted by applicable law. For example, we may collect information from the following third parties or other sources:

- Credit bureaus, for example when you apply for credit products, we obtain credit reports from credit bureaus to verify employment and income and to determine your credit worthiness.
- Government agencies, such as tax authorities, law enforcement or other regulatory authorities.
- Dealers and brokerage firms, such as when you engage in securities transactions or seek financial advice.
- Program partners, such as insurance providers or loyalty program partners.
- Advertising and analytics partners that provide us with information about your preferences, interests and browsing behaviour to help us customize our services and marketing strategies and measure the effectiveness of our advertising campaigns.
- Other financial institutions, such as banks, credit unions or insurance companies.
- Individuals or entities authorized to provide information on behalf of another individual, such as authorized owners, partners, settlors, beneficiaries, trustees, shareholders, directors, and authorized signatories, officers, agents, account administrators, representatives and authorized users.
- Publicly or commercially available sources

3. Why We Collect and Process Your Personal Information

When we collect personal information about you, we explain why we do so. The main reason we collect your personal information is to serve you as our client.

More specifically, we may collect and process your personal information for the following purposes:

- To establish, verify, and safeguard your identity and ensure accurate capture of your information;
- To deliver, manage and improve the products and services you have with us, including facilitating your access to, purchase of, or subscription to such products or services, and ensuring that all associated transactions are properly supported and implemented;
- To give you access to our online services and to create, establish and administer your accounts;
- To assess your eligibility for some products and services such as credit cards, lines of credit, mortgages or other loan products;
- To address your inquiries, respond to your comments and provide you with effective customer service. For example, we retain records of your correspondence with us to improve future interactions;
- To communicate with you in relation with the products and services you have with us, including for internal training and quality assurance purposes;
- To send you newsletters and other marketing communications, such as information about products and services that may be of interest to you, through various channels, including mail, telephone and electronic messages (e.g. e-mail, text message, social media messaging), subject to your right to opt out to such marketing communications at any time;
- To deliver personalized ads and content on our websites and third-party platforms based on your preferences and online behaviour;
- To measure the effectiveness of our marketing campaigns and optimize our marketing strategies;
- To understand how you and others interact with our websites and services in order to improve their performance, functionality and user experience;
- To understand your financial situation, to establish or verify your credit and identify your needs, particularly to give you financial advice and to provide investments that are suitable for you;
- To help us manage operations and risk within Laurentian Bank (including debt collection activities, compliance with legal and regulatory requirements or communications with regulatory authorities);
- To monitor and record your interactions with us through telephone or video-conference calls, through automated means, whether by interaction with our websites, by the use of surveillance, including video recording, in and around our branches, bank machines and other locations;
- To protect you, Laurentian Bank and our clients from errors, omissions, fraud and criminal activity, including the prevention, detection and investigation of fraud, money laundering, cyber threats and other such risks, threats and unauthorized or illegal activities;
- To perform analytics for study, research, statistical purposes or other legitimate business purposes; and
- To report on products that produce investment income.

How We Manage Consent and Your Privacy Choices

How We Manage Consent

We collect personal information about you only when you voluntarily provide it or authorize us to collect it from a third party, or as permitted or required by law. Typically, we will seek consent for the use or disclosure of your personal information at the time of collection. Your consent may be express or implied depending on the sensitivity of the personal information and other circumstances.

Your express consent is obtained verbally, online or in writing. Depending on your use of a product or service or when you contact us to obtain our products or services, we may rely on your implied consent to process your information for certain purposes. For example, your consent may be inferred when you voluntarily provide your information to us for an obvious purpose or for a purpose specified at the time of collection in accordance with applicable law.

If you have any questions about how we manage your consent, including the scope of consent requested, please refer to the “Contact Us” section below.

Your Privacy Choices

Subject to legal or contractual restrictions, you can refuse to provide or withdraw your consent at any time with reasonable notice. Please note that in certain situations, refusing or withdrawing your consent may deny you access to certain products, services or to important information. Please refer to the “Contact Us” section below for details on how to withdraw your consent and our staff will be pleased to explain your options and any consequences of withdrawing your consent.

- **Marketing Communications:** You have the ability to opt out of receiving marketing communications across various channels (including mail, telephone, e-mail, text message and social media messaging). You may do so at any time by providing us with reasonable notice, on any platform offered in your online services that provides you with the option to withdraw consent, or by contacting us. Please refer to the “Contact Us” section below for details. Alternatively, you may use the unsubscribe instructions included in our e-mails or other digital marketing communications, such as text messages and social media messaging, as applicable. Please note that even if you choose to unsubscribe from marketing and promotional communications, you may still receive account-related and transactional communications.
- **Cookies and Interest-Based Ads:** We use cookies and similar technologies to personalize and improve your experience on our websites, to help prevent fraud and enhance the security of our websites, and to deliver interest-based advertising. To manage your cookie preferences, you can block, delete or disable cookies or similar technologies through your browser settings. Please note that certain site features may require the use of these technologies. Therefore, if you choose to block or disable cookies, this may affect your browsing experience or limit your access to certain features. You may also manage your preferences for interest-based advertising, by using the Digital Advertising Alliance of Canada’s AdChoices tool (<http://youradchoices.ca/choices/>), which allows you to opt out of interest-based advertising from advertisers and ad networks that participate in the AdChoices program. To learn more about these practices and how to manage your preferences, please refer to our [Cookie Policy](#).
- **Call Recordings:** When you communicate with our customer service representatives or engage in transactions over the phone, your calls may be recorded to confirm our discussions and agreements with you and for quality control purposes. If you prefer not to have your calls recorded, you may transact business through an alternate channel where the service is available, such as our branches, at the office location where you obtain our services or through online banking or automated banking machines.

4. Sharing Your Personal Information With Third Parties

We may share your personal information to third parties with your consent or as otherwise permitted or required by law in certain scenarios:

- **Within Laurentian Bank:** We may share your personal information within Laurentian Bank to manage our operations and business needs and risks as well as to comply with legal and regulatory requirements. We may also share your personal information among Laurentian Bank affiliates for marketing purposes, and to determine whether any products or services provided by different Laurentian Bank affiliates are suitable for you. We may review the products that you currently have, how you use them, and assess your financial needs in order to offer you other Laurentian Bank products and services that we believe will be of interest to

you. Your consent to this use is optional and you can withdraw it at any time. Please refer to “Contact Us” below to withdraw your consent.

- **Service Providers:** We may share your personal information with our service providers to assist us in providing you with a service, such as transactional, insurance (and reinsurance), technology, document and material preparation, mailing/electronic mailings, courier, cash management, client management and service, document storage, record keeping, and cash logistics services. This disclosure is limited to what is necessary to perform their services and the personal information cannot be used for other purposes. For example, cheque printers and bank card manufacturers require some client personal information to provide their services;
- **Advertising and Analytics Partners:** We may share your personal information with advertising and analytics partners that help us understand how you interact with our websites, to customize and improve your browsing experience, to deliver targeted advertising based on your interests and browsing behaviour and to assess the effectiveness of our marketing campaigns. This may include information about your online activities and browsing behaviour, such as the pages you have visited on our websites, the links you have clicked and the time you have spent on particular pages;
- **Credit Products:** We may share your credit history, identifiable information and your repayment history to credit bureaus and other lenders on an ongoing basis to support the credit process. This permits the financial system to function efficiently and allows for the detection and prevention of fraud and allows us to continue to offer services to you;
- **Lawful Requests, Regulators and Self-Regulatory Organizations:** We may disclose your personal information if a law, regulation, search warrant, subpoena, court order or valid demand legally requires or authorizes us to do so. This may include requests from regulators and self-regulatory organizations that are responsible for overseeing Laurentian Bank’s business such as the Office of the Privacy Commissioner of Canada, the Office of the Superintendent of Financial Institutions of Canada, the Canadian Investment Regulatory Organization and the [Autorité des marchés financiers](#);
- **Investigation and Fraud:** Your personal information may be shared in the case of a breach of an agreement or contravention of law to help prevent fraud, money laundering and other criminal activity;
- **Debt Collection:** We may also share your personal information to help us collect a debt from you; and
- **Transfers of Business:** We may buy businesses or sell parts of Laurentian Bank from time to time. Personal information regarding the accounts or services purchased or sold, including client personal information, is generally one of the assets to be transferred and released to all parties to a transaction.

5. Protecting Your Personal information

We protect your personal information with appropriate physical, procedural and technological safeguards and security measures that take into account the volume, sensitivity, intended use and format of the information. To this end, Laurentian Bank has implemented a comprehensive set of policies and practices to protect the confidentiality and security of your personal information. Here are some ways in which we protect your information:

- **Employee Training:** Our employees are trained to adhere to specific policies and procedures to safeguard your personal information. Doing so is not only specified in our code of ethics, procedures and employment agreements but is also regularly re-confirmed in writing by our employees.
- **Access Controls:** We authorize our employees, agents and consultants to get information about you only when they need it to do their work for us;
- **Data Outsourcing:** We require service providers to have appropriate safeguards in place to protect your personal information. In addition, they agree to use it only to provide the services we ask them to perform for us. We have agreements in place with these service providers that require them to comply with applicable privacy laws;
- **Technical Controls:** We use certain technical controls to protect your information when you interact with us online. For example, when dealing with your personal information online, we use encryption techniques to protect the confidentiality of your information, which are among the safest encoding methods available on the market. These methods encode data exchanges to prevent unauthorized access to personal information entered during a session or information transmitted during our exchanges. Bank encryption methods are recognized data codification processes that ensure the safety of information transmitted. To access our

online services, you must use an Internet navigator equipped with compatible encryption;

- **Regular Testing and Auditing:** We test and audit our safeguards and security measures regularly to ensure that they are properly administered and that they remain effective and appropriate for the sensitivity of the personal information.
- **Retention Policy:** We have policies in place to limit the retention of personal information to what is necessary to fulfill the purposes for which it was collected or used, and to securely dispose of the information when it is no longer needed or required to be retained by law; and
- **Chief Privacy Officer:** We have appointed a Chief Privacy Officer who is responsible for monitoring our compliance with applicable privacy laws. Please refer to the “Contact Us” section below to view the Chief Privacy Officer contact information.

Please note that your role in protecting your personal information is equally important. Here are some important reminders:

- E-mail communications are generally unencrypted. We recommend that you exercise caution when sending us e-mails and avoid including confidential information such as account numbers.
- Be aware of fraudulent activities where fraudsters send fake e-mails impersonating Canadian banks requesting that you verify personal and banking information. These e-mails often ask the recipient to click on a link in the e-mail that directs them to a pop-up window or counterfeit online banking log-in page to enter their bank’s log-in ID and password. We will never send you e-mails asking for confidential information like passwords, social insurance number or account numbers. Please do not respond to any e-mails asking for information like this.

6. Retention

We retain your personal information for as long as is necessary to fulfill the purposes for which it was collected or otherwise processed, to effectively manage our operations and our relationship with Individuals, to establish, exercise or defend a legal claim and to comply with applicable laws. The length of time we retain your personal information varies depending on the product or service, the nature of the personal information and the context of its use. The retention period may sometimes extend beyond the end of your relationship with us but only for so long as is necessary for us to have sufficient personal information to manage any issue that may arise later or to comply with any law, regulation or guideline issued by a governmental or self-regulating entity.

7. Cross-border Transfers of Personal Information

Laurentian Bank is based in Canada, and we may access, process or store your personal information in regions other than where you reside. Some of our service providers may access, process or store your personal information in countries or regions other than where you reside, including the United States. As a result, your information may be subject to the laws of those countries or regions, including laws that may permit government entities, courts and law enforcement authorities to access such information.

8. Accessing and Rectifying Your Personal information

You have the right to access and rectify your personal information held by Laurentian Bank. As such, we have established procedures to assist you in exercising these rights.

Access to Personal Information

If you are a client of Laurentian Bank, you can access most of your personal information through your transaction records. These are available to you through your account statements, by visiting the branch or office where your account is held, or by accessing your account through online banking, telephone banking or automated banking machines.

If you require other personal information, please contact us as set out in “Contact Us” below with a written request. We may ask for reasonable fees depending on the information requested and will advise you of such fees prior to providing you with the information.

Please note that we may refuse to communicate some information contained in our records in accordance with applicable law and, in that case, will advise you in writing of our refusal. For instance, we cannot provide you with personal information in our records that contain references to other persons, Laurentian Bank’s proprietary

information, information that relates to an investigation of a breach of an agreement and, a contravention of a law, or information that is subject to legal privilege or that cannot be disclosed for other legal reasons. You may file a complaint in accordance with the applicable complaint procedure if you are not satisfied with our decision as set out in “Addressing Your Concerns” below.

Rectification of Personal Information

We make every reasonable effort to keep your personal information accurate, complete and up-to-date and have implemented policies and procedures to maintain the accuracy of your personal information. However, we also rely on you to keep us informed of any changes to your personal information, such as changes to your telephone number or address. Having accurate personal information enables us to comply with the law and give you the best possible service.

If at any time you become aware of any inaccuracies in your personal information, please contact us as set out in “Contact Us” below with a written request and we will promptly make the necessary corrections. Please note that if you do not inform us of changes to your personal information, we may no longer be able to communicate with you or continue providing our services to you.

9. Changes to the Privacy Statement

We may update this statement from time to time. We will notify you of any significant changes by posting a notice on our website or by other appropriate means in accordance with applicable privacy laws. The updated privacy statement will be effective from the date of posting. We encourage you to review our privacy statement regularly to stay informed about our information practices and the choices available to you. The “Last Updated” date at the top of this statement indicates when it was last changed.

10. Contacting Us

For any questions or concerns regarding your personal information, including to withdraw your consent or to access or rectify your personal information, please contact the following entities.

Entity	Contact Details
Laurentian Bank of Canada Inc. 1360 René-Lévesque Blvd. W. Suite 600 Montreal, QC H3G 0E5	514.522.1846 1.800.522.1846 customer_inquiries@laurentianbank.ca
LBC Trust, /Laurentian Trust of Canada Inc. 1360 René-Lévesque Blvd. W. Suite 600 Montreal, QC H3G 0E5	514.522.1846 1.800.522.1846 customer_inquiries@laurentianbank.ca
LBC Financial Services Inc. 1360 René-Lévesque Blvd. W. Suite 630 Montreal, QC H3G 0E9	514.252.1846 1.800.252.1846 lbcs@laurentianbank.ca
B2B Bank / B2B Bank Financial Services Inc. / B2B Bank Intermediary Services Inc./ B2B Bank Securities Services Inc./ B2B Trust Co. 199 Bay Street, Suite 600, PO Box 279 STN Commerce Court, Toronto, Ontario, ON M5L 0A2	1.800.263.8349 1.800.387.2087 questions@b2bbank.com Contact Us B2B Bank Contact Us (B2B Dealer Services)
Laurentian Bank Securities Inc. / Laurentian Bank Insurance Inc. 1360 René-Lévesque Blvd. W. Suite 620 Montreal, QC H3G 0E7	514.350.2868 or 1.888.350.8577 Laurentian Bank Securities Contact Us (vmbi.ca) privacy@lb-securities *LBI -Contact your Financial Security Advisor
LBC Capital Inc. 5035 South Service Road Burlington, Ontario L7R 4C8	1.888.563.4321 customer.inquiries@lbccapital.ca Canadian.Privacy@LBCCapital.ca

If you are not satisfied with how your request was handled or if you have any other concerns relating to privacy, please contact our Chief Privacy Officer.

Chief Privacy Officer
Laurentian Bank
1360 Rene-Levesque Boulevard West, Suite 600
Montreal, QC H3G 0E5
Email: privacy@laurentianbank.ca

¹Laurentian Bank: Laurentian Bank of Canada, Laurentian Bank Securities Inc, LBC Trust, Laurentian Trust of Canada Inc., LBC Financial Services Inc., Laurentian Bank Insurance Inc., B2B Bank, B2B Bank Financial Services Inc., B2B Bank Securities Services Inc., B2B Intermediary Services Inc., B2B Trustco, LBC Capital, are all part of Laurentian Bank