



Protecting Your Privacy

At Innovation Credit Union (“Innovation”, “we”, “our”), we are committed to protecting your personal information. This Privacy Code outlines the scope of personal information we collect, the reasons we collect it, the measures we take to keep it safe, and your rights related to controlling the use of your information.

Our Privacy Code is based on the principles outlined in Canada’s federal privacy legislation, the *Personal Information Protection and Electronic Documents Act* (“PIPEDA”). PIPEDA sets out 10 fair information principles that govern how we collect, use and disclose your information.

For more information on PIPEDA, visit <https://www.priv.gc.ca/en/>.

What personal information do we collect?

We collect some or all of the following information from our members and non-members that we do business with:

- Contact information, such as your name, address, date of birth, etc.,
- Income and employment information,
- Financial records and transactional information,
- Social Insurance Number (SIN),
- Credit history,
- Information you provide to us about yourself, such as your preferences, marital status, gender, or ethnicity, and
- Other information which may be helpful or necessary to administer your account(s). For example, if you wish to give someone with a power of attorney access to your banking, we will collect certain information and documentation to set that up for you.

If we receive personal information about you from third parties, such as through our member referral program, we will protect that information as if we received it from you.

We also collect certain information when you use our products and services and access our website and mobile banking applications. For more information, refer to our [Digital Privacy Policy](#).

Who do we share your personal information with?

We never sell, rent, or lease your personal information. We share your information for the specific purposes outlined in this Code to the following parties:

- With our trusted partners, suppliers, service providers and affiliates, so we can provide you with products and services you request, or offer you products and services that fit your needs,
- With joint account holders or other personal representatives, you permit to access your banking,
- With external parties when required or permitted to do so by law, for example, to protect you or other Innovation members from fraud,
- With external parties when we receive a valid legal demand related to your personal information, for example, requests made by law enforcement, and
- With service providers we use to conduct market research.

You can withdraw your consent to use your information for certain purposes. For more information on withdrawing consent, refer to section **C. Principle – Consent** below.

When we share your information with third parties, we require that they protect your information according to the standards and principles we have adopted and outlined in this Code.

When we share your information with third parties located outside of Canada, those third parties are subject to the laws of that foreign jurisdiction and may be required to disclose your information in accordance with those laws.

The following PIPEDA principles inform our approach to managing your personal information while it is in our possession or control.

A. Principle – Accountability

We are accountable for protecting your personal information in our possession or control. We take the following measures to ensure your personal information is kept safe and secure:

- We appoint a Privacy Officer who is responsible for ensuring your information is protected and that we as an organization comply with this Code. Our Privacy Officer is accountable to our Board of Directors to report on issues related to privacy,
- We ensure that any third party that is given access to your information protects your information in accordance with this Code. We only share as much of your information with third parties as is necessary to obtain the service they are providing, and

- We establish internal processes designed to keep your personal information safe and secure, and implement policies, procedures, and training programs to ensure our staff understand how to protect your personal information.

B. Principle – Identifying Purposes

When we collect your personal information throughout your relationship with us, we will identify the purposes that we collect, use and disclose that information for. We may use or disclose your personal information for any of the following purposes:

- To verify your identity and manage access and security to your services,
- To open, maintain and administer your accounts and provide financial services that meet your needs,
- To understand your financial services needs and eligibility for products and services that we offer,
- To offer and provide you with products and services of ours and our affiliates and service providers,
- To obtain credit reports and evaluate your creditworthiness,
- To contact you about community events, to participate in research or surveys, or to provide you with newsletters and other information that may be of interest to you,
- To protect yourself or others from risk of fraud or other harm,
- To assist in dispute resolution or to respond to questions you may ask us,
- To maintain our member registry as required by applicable legislation, and
- To comply with legal and regulatory requirements.

We will update this Privacy Code and obtain your consent if we intend to use your personal information for any other purpose.

C. Principle – Consent

We need your consent to collect, use, and disclose your personal information.

When you become an Innovation member, we obtain your consent to collect, use and disclose your personal information in accordance with this Code and the terms and conditions of our Financial Services Agreement and any corresponding Account Agreement. If you do not provide us with certain personal information, or if you elect to withdraw your consent to use certain personal information, we may not be able to provide you with products or services you request.

You can withdraw your consent to collect, use, and disclose your information in certain circumstances, but in other circumstances you may not be able to withdraw consent. If we are required to use or retain your personal information due to legal or regulatory requirements, you cannot withdraw your consent for that use or disclosure.

For example, we are required by law to provide certain information to the Canada Revenue Agency if you have interest earning products, and you cannot withdraw your consent for us to use your information for that purpose. We may also be required to provide your information to an investigative body if requested, or if we suspect there may be criminal activity in relation to any of your accounts. In these situations, and other similar situations where we are required to disclose your information, we will disclose your information despite the fact you may have withdrawn your consent for other uses.

At any time, you can contact us and let us know you do not consent to us using your information for the following purposes:

- Contacting you about community events and celebrations,
- Contacting you for anonymous feedback about our products and services,
- Sending you Innovation Digest, which is a periodic selection of our top-rated articles and blogs filled with personal insights, life hacks, and ideas to help achieve your financial goals,
- Contacting you with personalized offers, incentives, rewards, and rate updates to help you earn or save money faster, and
- Using your Social Insurance Number (SIN) for credit matching purposes.

If you wish to withdraw consent to use your information for any of those purposes, you can do so through the following methods:

- By contacting our Call Centre
- By visiting or contacting any of our Advice Centres
- By using the unsubscribe link attached to any promotional email or message we send you (except for the use of your SIN)
- By completing our [email preferences form](#)

Until you withdraw your consent, we will use your information for the purposes described in this Code.

D. Principle – Limiting Collection

We only collect information about you to help us provide you with the highest level of financial services or when we are legally required to do so. We will not collect any

information that does not relate to the purposes outlined in section **B. Principle – Identifying Purposes**.

E. Principle – Limiting Use, Disclosure and Retention

We will only use, disclose, and retain your personal information for the purposes identified in this Code (see **B. Principle – Identifying Purposes**). If we intend to use or disclose your information for a new purpose, we will obtain your consent.

We will only retain your information for as long as necessary to comply with legal and regulatory requirements or to fulfill a legitimate business purpose, after which point it will be removed from our records in accordance with our internal record retention and destruction processes.

F. Principle – Accuracy

We will do our best to keep your personal information up to date. From time to time, we may contact you and request that you update the personal information you have provided us.

You can also update your personal information any time:

- Through your online and mobile banking
- By contacting our Call Centre
- By visiting or contacting any of our Advice Centres

G. Principle – Safeguards

We implement physical and technological safeguards to keep your information safe and secure. These safeguards include but are not limited to:

- Implementing appropriate levels of physical and electronic security for information we keep in our possession, such as limiting access to certain information or areas where information is stored; and
- Careful destruction of your information in our possession when we no longer require it for any legal or business purpose.

When we share your information with third parties, we require they protect your information in accordance with this Code.

H. Principle – Openness

We provide you with this Code to help you understand how we will handle your personal information. From time to time, we will update this Code. We will notify you when those changes occur, and we will always make the most recent version of the Code available online and in our Advice Centres.

I. Principle – Access to Information

You can review or verify your personal information in our possession, as well as find out how we have used and disclosed your information (subject to any legal requirement we may have to not notify you when information has been shared).

If you wish to do so, you must submit a written request to our Privacy Officer. See [Contact Our Privacy Officer](#).

J. Principle – Challenging Compliance

You are entitled to challenge our compliance with this Code. You can express any concern you may have or direct any inquiries to our Privacy Officer. See [Contact Our Privacy Officer](#).

Contact our Privacy Officer

If you have any questions or concerns about how we handle your personal information, or if you would like to make a request for access to your information in our possession and details about how that information has been used and shared, contact our Privacy Officer.

Email: innovationprivacyofficer@innovationcu.ca

Mail (Attention: Privacy Officer):

Head Office - Swift Current

P.O. Box 1090 Station Main, Swift Current, Saskatchewan S9H 3X3

You can visit any of our Advice Centres or contact our Call Centre for general privacy inquiries and information, or if you are having trouble contacting our Privacy Officer.

You can also contact the Office of the Privacy Commissioner of Canada to express any concerns you have related to how we handle your personal information.

Online: <https://www.priv.gc.ca/en/report-a-concern/>

By Telephone:

Toll-free: 1-800-282-1376

Phone: (819) 994-5444

Fax: (819) 994-5424

TTY: (819) 994-6591