

PRESIDENT'S CHOICE FINANCIAL PRIVACY NOTICE

Effective Date: October 16, 2023

1 General Information About This Notice

- This notice provides more information on how President's Choice Bank (also referred to as "PC Bank", "PC Financial", "us", "our", or "we") collects, uses, and shares the personal information of its customers ("you").
- This notice is governed by the <u>Loblaw Privacy Policy</u> and is in addition to the "Collection Use, Disclosure and Sharing of Information" section in the *PC Financial* payment product application terms and conditions. If there is any inconsistency between this notice and the Loblaw Privacy Policy, the Loblaw Privacy Policy will prevail.

2 What Information Do We Collect and How?

At PC Bank we respect your privacy and take great care in protecting your personal information. "**Personal information**", as used in this notice and the Loblaw Privacy Policy, is any information that identifies you or could be reasonably associated with you.

The personal information that we collect may include, but is not limited to, your:

- Name, email address, date of birth, home address, income, and occupation;
- **Personal transactional information**, when you make purchases using your *PC Financial* payment products, such as, transaction details and the merchants that you made purchases from; and
- Personal financial information, through the use of your PC Financial payment product accounts, such as, your account balances, account numbers, payment history, credit limits and credit scores.

PC Bank collects personal information as outlined in the Loblaw Privacy Policy and in the following ways:

A. Applying for PC Financial Payment Products

PC Bank collects your personal information when you apply for a *PC Financial* payment product, such as a credit card. For credit products, we also collect information from third parties such as credit bureau agencies and other entities that support the credit reporting system as part of the application process.

B. Using Your PC Financial Payment Products

PC Bank collects your personal information, including personal financial information and personal transactional information, when you use your *PC Financial* payment product. We may also collect your information from service providers who process your transactions when you use *PC Financial* payment products in stores or online.

□ For more information on how we collect your personal information, please visit the Loblaw Privacy Policy and review the section "How Do We Collect Personal Information?" and the "Collection Use, Disclosure and Sharing of Information" section in the PC Financial payment product application terms and conditions.

3 How Do We Use This Information?

PC Bank uses your personal information to enable our everyday business processes, such as providing programs, products, and services and communicating with you.

A few examples of how we use your personal information include:

- Processing your purchases, refunds and other transactions using your PC Financial payment products;
- Creating, administering, and maintaining accounts which may include processing your application for a payment product and other products and services that we offer our customers, and creating and facilitating the delivery of your statements of account;
- Verifying your identity to determine your eligibility for a payment product, service, or program;
- Serving you with interest-based advertisements on our products and services that we think may be
 of interest to you, subject to your right to withdraw consent as detailed in our <u>Interest-Based</u>
 Advertising and Media Notice;
- Managing fraud on your accounts;
- Managing credit risk in evaluating credit applications, approving transactions, and assessing and updating your credit-worthiness on an ongoing basis (e.g., to adjust your credit limits or any other features on your accounts);
- Investigating, addressing, and managing customer service inquiries that are raised to us; and
- Meeting regulatory obligations, such as "know your client" and anti-money laundering requirements, which require that we collect, among other things, your name, address, date of birth, citizenship, occupation, and government-issued identification information.

Automated Decision-Making

We may use various technologies to help us provide you with our programs, products, and services, to manage our business operations, to communicate with you and to enhance your customer experience with us. In most cases, these tools assist, but do not replace, human judgment in making a decision. In some cases, the technology allows us to make fully automated decisions about you. We may, for example, use fully automated decisions to help us process card applications, assess credit risk or monitor accounts for fraud. When this occurs, we may notify you of the automated nature of the decision and tell you how to contact us to learn more about the automated decision as required by applicable law.

• For more information on how we use your personal information, please visit the <u>Loblaw Privacy Policy</u> and review the section "How Do We Use Personal Information?"

4 How Do We Share This Information?

We will not share your personal information outside of PC Bank, except for the following purposes or as detailed in the Loblaw Privacy Policy, or as permitted or required by law.

A. Within Our Group of Companies

PC Bank may share your <u>personal transactional information</u> within our group of companies for the purposes described in this notice and the <u>Loblaw Privacy Policy</u> in accordance with applicable law. However, we will not share your <u>personal financial information</u> within our group of companies.

B. Service Providers

In the course of providing our products and services, PC Bank may share your personal information with service providers who we use to help us operate our business, technology systems, internal procedures, infrastructure, and to allow us to advertise and market to you as well as assist us to meet our legal and regulatory obligations. These service providers assist us with services such as printing and mailing payment cards and account statements, e-mail communications, customer service, fraud prevention, advertising, analytics, and processing transactions.

For more information on how we share your personal information, please visit the <u>Loblaw Privacy Policy</u> and review the section "How Do We Share Personal Information?"

C. Third Party Disclosure

PC Bank discloses your personal information to third party organizations in order to confirm eligibility for a payment product or to process a transaction. For example, when you apply for a PC Bank payment product, we share your personal information with credit bureau agencies in order to allow us to determine whether you qualify for a specific product. We also share your personal information on an ongoing basis to evaluate your ability to continue with a specific product or feature associated with one of your products and to maintain the integrity of the credit reporting system.

☐ For more information on how we share your personal information, please visit the <u>Loblaw Privacy</u> Policy and review the section "How Do We Share Personal Information?"

5 What Are Your Privacy Choices?

Information on how to manage your privacy choices is available in the section "How Do I Change My Privacy Choices?" of the Loblaw Privacy Policy.

6 Who Can You Contact With Questions About This Privacy Notice?

For more information, please visit the <u>Loblaw Privacy Policy</u> or contact the Chief Privacy Officer at the PC Financial Privacy Office by e-mail at <u>privacy@pcfinancial.ca</u>, or in writing at 600-500 Lakeshore Blvd. West, Toronto, Ontario, M5V 2V9 or by phone at 1-866-639-0012.