



## Protecting Your Privacy

---

Kingston Community Credit Union is committed to protecting your privacy by keeping your personal information accurate, confidential, and secure during collection, use, and disclosure.

Privacy legislation sets the rules for how we can collect, use, and disclose your personal information.

Personal information means information about an identifiable individual. This can include information such as your name, home address, telephone number, birth date, email address, and social insurance number. It can also include financial information such as your bank account number, credit rating, or income. Personal information can be collected in several ways, including through our forms, documents that you provide, or our online banking system. We keep all the personal information that we collect securely protected in physical and electronic files.

### The 10 Privacy Principles

The following privacy principles guide our handling of your personal information:

1. Accountability
2. Identifying Purposes
3. Consent
4. Limiting Collection
5. Limiting Use, Disclosure, and Retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual Access
10. Challenging Compliance

We have comprehensive privacy policies and processes based on these principles that govern how and why we collect, use, and disclose your personal information. Our Privacy Officer can give you more information about our policies and processes (see the contact details at the end of this brochure).

### Why We Collect Your Personal Information

At the time that we collect your personal information, we will tell you why we are collecting it and how it will be used and disclosed. This information will be included in the form we use to request and record your consent. We will only collect as much personal information as we need to meet the stated purposes, and we will only use and disclose your personal information for the same purposes.



If we wish to use and/or disclose your personal information for a purpose that is not required for a product or service you request, such as marketing, we will ask for your express consent\* before proceeding to use your information in this way.

*\*Express consent is when you clearly accept the terms of a consent request.*

## Using Your Social Insurance Number (SIN)

We are required by law to obtain your SIN to report interest on your deposits, dividends on your shares, and other investment income to the Canada Revenue Agency. Use of your SIN for any other purpose is optional, and you have the right to refuse your consent. However, allowing us to use your SIN for administrative purposes can help us keep your records separate from other individuals with the same name. And if you apply for credit products or credit-related services, allowing us to use your SIN to verify your identity will ensure that we obtain your full personal credit report and not one belonging to someone else.

## How We Use Your Personal Information

We need to be able to use and disclose your personal information to be able to provide you with the products and services you request and to run the Credit Union effectively.

We use your personal information to

- verify your identity and ensure your records are kept separate from those belonging to other people;
- process your application for an account, and to provide and administer your accounts and related products and services;
- allow us to assess and manage risk from the products and services you request;
- obtain a full credit report on you, where appropriate and with your express consent;
- protect you and us from fraud and error, including identity theft;
- collect debts you owe to us;
- provide you with access to online banking and to administer and manage your access rights;
- market to you, but only with your express consent.

We may send you communications by commercial electronic message where you have provided your express consent to this. These are messages sent by electronic means, including email, voice, sound, text, or image, and must meet certain legal requirements.

Detailed information about how we use your personal information will be provided at the time that we ask for your consent to such uses.



## How We Disclose Your Personal Information

We will disclose your personal information to various parties, such as participants in the payment and clearing systems, and third-party product and service providers.

Third-party product and service providers can include the following:

- data service providers (e.g., banking system providers)
- cheque printers
- card manufacturers
- provincial or national central credit unions and trade associations
- credit reporting and fraud checking agencies
- marketing partners
- individuals and agencies involved in debt collection
- participants in the payment and clearing systems.

Except as permitted or required by law, we will only disclose your personal information to be able to provide you with the products and services you request and to allow us to effectively run the Credit Union.

We are responsible for all personal information we collect from you, even if it is disclosed to another party. We will ensure that any other parties that hold your personal information have safeguards in place to protect your personal information. In addition, we will only deal with reputable organizations.

If you have accounts that are joint with other persons, any or all of your personal information may be disclosed to all joint account holders.

Detailed information about how we disclose your personal information will be provided at the time that we ask for your consent to such disclosures.

## How Long We Keep Your Personal Information

We keep your information only for as long as we need it to

- administer products and services; and/or
- meet any legal, regulatory, or tax requirements.

We will securely destroy, dispose of, or anonymize your personal information when it is no longer needed or serving any of the purposes outlined above.

## How You Can View, Verify, and Correct Your Personal Information

The personal information we hold about you will be accurate and complete as of the date you provide it. You can request access to see your personal information. If you think any of your personal information is wrong, you can ask that we correct it.



If you want to see and/or correct your personal information, please contact an employee or our Privacy Officer. You will need to provide as much information as you can to help us process your request, such as dates, account numbers, and any other details that can help us track down the information you require. More information about the request process, including time limits for providing our response, will be provided at the time you make the request.

If you want to see a copy of your personal credit report, please contact a credit reporting agency. We can provide assistance if you need help contacting a credit reporting agency.

### **How to Withdraw Consent for the Collection, Use, and/or Disclosure of Your Personal Information**

You can withdraw your consent for the collection, use, and/or disclosure of your personal information at any time, subject to legal and contractual restrictions, by providing written notice to us. We will comply with your request within a reasonable time.

If you withdraw your consent, we may not be able to provide you with products and services that you currently have or request in the future. We will tell you of the consequences of withdrawing your consent before we process your request.

Please note that even if you withdraw your consent, we may have to retain your personal information for a period of time for legal or business purposes.

### **How We Protect Your Personal Information**

We will protect your personal information through a combination of physical, technological, and organizational measures, which can include secure storage, passwords, and encryption. Access to your personal information will be restricted to employees with the appropriate clearance level who need the information to do their jobs.

### **How You Can Protect Your Personal Information**

You may access your accounts with a Member Card® debit card, online banking, and/or telephone banking. To do so, you must use personal security codes that you choose. These security codes protect your accounts and your personal information from unauthorized access. It is **your responsibility** to protect your security codes.

The following tips can help you protect your accounts and personal information from unauthorized access:

- Do not choose obvious numbers (e.g., birth date, 12345) or words (e.g., child's name) for your personal security codes
- Do not write down or record your personal codes



- Do not send confidential information to us or anyone else through email, text messages, or social media
- Keep your account and credit card statements, blank cheques, and your personal financial information in a safe place at all times, such as a locked cabinet or a safe
- Tell us immediately if you suspect that your personal security codes are known by anyone else
- Review your account statements carefully, within 30 days of receipt. If you do not receive account statements, regularly review your account online
- Tell us immediately if your address changes or if you find any errors in your information.

## **Our Website and Use of Cookies**

When you visit our website and/or use online banking, our computer systems may record certain information in the form of cookies, such as which pages you visit, the time and date of your visit, and the IP address of your computer. We use this anonymous information to analyze and improve the performance of our website.

In most cases cookies collect generic information. However in some cases, the cookies we use may collect some personal information about you. We will protect this information in the same way as we protect other personal information we collect about you. You may be able to disable use of cookies through your internet browser, but this may affect your browsing experience, and you may not be able to access certain areas of our website, such as online banking.

## **Questions?**

If you have any questions, please contact our Privacy Officer.

Our Privacy Officer can answer your questions about personal information and privacy and provide you with information about our policies and practices. Our Privacy Officer can also help you complete an access to information request, help you correct your personal information, and try to resolve any concerns or complaints you have regarding our policies or practices.

## **Contact**

**Privacy Officer**  
**Kingston Community Credit Union**  
**795 Gardiners Road**  
**Kingston Ontario, Canada K7M 7E6**  
**Email: [privacyofficer@kccu.ca](mailto:privacyofficer@kccu.ca)**  
**[kccu@kccu.ca](mailto:kccu@kccu.ca)**