



Citi Canada

Privacy of Personal Information Statement



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INTRODUCTION

The following Citi companies are Canadian companies and affiliates of each other and Citigroup Inc., the leading global financial services company. These Canadian companies (collectively referred to as “Citi Canada” in this Privacy of Personal Information Statement) provide a wide range of financial products and other products and services to their customers throughout Canada.

Citibank Canada: Citibank Canada provides a wide range of financial services to corporate customers and personalized wealth management products and services to customers in Canada. Citibank Canada is the issuer of Citi MasterCard*, Citi Visa† and Citi Prepaid cards in Canada.

Citibank N.A. (Canadian Branch): Citibank N.A. (Canadian Branch) provides a wide range of financial services to corporate customers in Canada.

Citi Trust Company Canada: Citi Trust Company Canada provides agency and trust services to institutional clients.

CitiFinancial Canada Inc.: CitiFinancial Canada Inc. is comprised of the following three businesses:

- ***Branch Network:*** This business offers community-based lending through a variety of personal loans and real estate secured loans, and related servicing of those loans, to its individual customers in New Brunswick, Nova Scotia, and Newfoundland and Labrador through CitiFinancial Canada East Corporation, and to its individual customers in the rest of Canada through CitiFinancial Canada, Inc.
- ***CitiFinancial Retail Services:*** This business offers private label credit card programs in Canada for various Canadian retailers under which it issues private label credit cards and services the accounts on which those cards are issued.
- ***Citicorp Home Mortgage:*** This business originates and services mortgage loans throughout Canada.

Citigroup Fund Services Canada Inc.: Citigroup Fund Services Canada Inc. is a Canadian provider of various third-party administrative services to its institutional clients, which include Canadian chartered banks, mutual fund companies, insurance companies and other financial institutions, offer and provide various financial and other services to their individual customers throughout Canada.

Citi Cards Canada Inc.: Citi Cards Canada Inc. offers private label credit card programs in Canada for Canadian retailers under which it issues private label credit cards and services the accounts on which those cards are issued. Citi Cards Canada Inc. is also the account servicer for all Citi Commercial Card accounts in Canada on which Citi Commercial Cards are issued. As the account servicer, Citi Cards Canada Inc. performs account servicing and related activities on Citi Commercial Card accounts in Canada and administers the cardmember agreements governing those accounts.

Triton Insurance Company and American Health and Life Insurance Company: These companies provide various creditor's group insurance products and services to individual customers of CitiFinancial Canada Inc. and CitiFinancial Canada East Corporation throughout Canada.

OUR PRIVACY NOTICE: Our goal is to maintain your trust and confidence when handling personal information about you.

You Have Choices: As a Citi Canada customer, you have the opportunity to make choices about how personal information about you may be shared. As you consider this, we encourage you to make choices that enable us to provide you with quality products and services that help you meet your financial needs and objectives.

Security of Personal Information: The security of personal information about you is our priority. We protect this information by maintaining physical, electronic, and procedural safeguards that meet applicable law. We train our employees in the proper handling of personal information. When we use other companies to provide services for us, we require them to protect the confidentiality of personal information they receive.

GENERAL: As you read this Privacy of Personal Information Statement (“**Privacy Statement**”), please remember that:

- **Section A** of this Privacy Statement applies only to the following Citi Canada companies: Citibank Canada, Citibank N.A. (Canadian Branch), Citi Trust Company Canada, Citi Cards Canada Inc., CitiFinancial Canada Inc., and CitiFinancial Canada East Corporation.
- **Section B** of this Privacy Statement applies only to the following Citi Canada company: Citigroup Fund Services Canada Inc.
- **Section C** of this Privacy Statement applies only to the following Citi Canada companies: Triton Insurance Company and American Health and Life Insurance Company.

We have designated a Privacy Officer for each of the Citi Canada companies listed above to ensure our compliance with applicable law, to receive and respond to customers' questions and complaints, and to deal with requests for access to and rectification of personal information files.

Corporate customers and business customers will receive the privacy protections stated in this Privacy Statement, even though corporate and business accounts and services are not personal accounts or services.

CHANGES TO THIS PRIVACY STATEMENT: Any changes to this Privacy Statement and our information handling practices will be acknowledged in this Privacy Statement in a timely manner. We may add, modify or remove portions of this Privacy Statement when we feel that it is appropriate to do so. You may determine when this Privacy Statement was last updated by referring to the “Current” date displayed at the end of this Privacy Statement.

SECTION A

General: This Section A of the Privacy Statement applies only to Citibank Canada, Citibank N.A.(Canadian Branch), Citi Trust Company Canada, Citi Cards Canada Inc., CitiFinancial Canada Inc. and CitiFinancial Canada East Corporation. These companies will be referred to as “Citi” or, depending on the context, as “we”, “our”, or “us”, in this Section A of the Privacy Statement. As well, in this Section A of the Privacy Statement, “you” and “your” means an individual customer of Citi.

Categories of Personal Information We Collect and Hold: The nature of personal information we collect and hold about you may include:

- information we receive from you on applications or other forms, such as name, gender, date of birth, address, telephone number, email address, occupation, employer,



assets, income, language preference and personal identification information (such as government-issued identification, social insurance number, driver's license, passport and/or, where permitted, provincial health insurance card);

- information we receive from you on a volunteer basis when we are conducting a survey of your preferences, needs or interests;
- information about your transactions with us, our affiliates, or third parties, such as account numbers, account balances, payment history, and account activity;
- information we receive from your employer;
- reports we receive from credit bureaus;
- information we receive from program partners and service providers with or for whom we operate a Citi Commercial Card program, a private label credit card program, a loyalty or rewards program or other financial services program; and
- information on the loyalty or rewards programs attached to your account, such as name, address, phone numbers, Card number, number of years of membership, and types of loyalty features or rewards you have selected.

We are not collecting any sensitive information from our affiliates or third parties, such as medical information, detailed information regarding specific purchases of goods or services, or information concerning customer preferences, needs or interests where a reasonable person would expect the subject matter to cause offence or embarrassment.

We have established policies and procedures pertaining to the retention and destruction of the personal information that we hold about you.

Purposes of Collecting Your Information: Citi may use the personal information we collect about you for the following purposes:

1. to make decisions about applications, including verifying your identity;
2. in the case of a social insurance number, for tax reporting purposes, as identification for opening a deposit account or cashing a government cheque, and for credit bureau file matching purposes;
3. to evaluate credit worthiness, monitor, service and collect your account;
4. to respond to your inquiries about applications, accounts or other services;
5. to meet legal, security, processing and regulatory requirements, including Canadian federal and provincial requirements and foreign requirements applicable to us or any of our affiliates or service providers;
6. to understand your needs and to offer products and services to meet those needs. In the case of a Commercial Card or private label credit card account, this also means that we will not send you offers for products and services where we reasonably determine they are inappropriate for you or do not meet your needs;
7. to allow our affiliates and selected companies to promote their products and services to you. In the case of a

Commercial Card or private label credit card account, this also means that we will not assist our affiliates and selected companies in promoting products and services to you where we reasonably determine that they are inappropriate for you or do not meet your needs;

8. if you are a corporate or business account cardmember, to provide information on your account to your employer, its affiliates and its parent, in the case of a MasterCard account to MasterCard International Incorporated (and to its respective franchisees and licensees) and, in the case of a VISA account to Visa International Service Association as the case may be, for legitimate business purposes; and
9. such other purposes as we disclose in this Section A of the Privacy Statement or that we identify to you from time to time or as permitted by law.

You may refuse or withdraw your consent to 7. above, as explained in this Section A of the Privacy Statement. We may also use or disclose personal information for other purposes with your consent, or as otherwise permitted or required by law (see *Consent* section, below).

Disclosures of Your Personal Information: In common with many organizations, we keep our costs down by obtaining some routine services from service providers, and your personal information may be provided to them. These service providers must sign a confidentiality agreement and may only use the information disclosed to them for the specific purposes mentioned in the agreement, after which they must return this information to Citi or destroy it, without keeping a copy. These disclosures to service providers may be for:

- cheque and statement preparation, printing and other administrative services;
- card, security code and product/service issuance services;
- settlement and valuation services;
- data processing and market research services;
- legal, regulatory and compliance purposes, including Canadian federal and provincial requirements and foreign requirements applicable to us or any of our affiliates or service providers;
- financial, professional advisory and wealth management services;
- updating of information to credit bureaus;
- participating in payment systems and networks (e.g. the electronic networks that allow consumers to pay their credit card accounts, loans or other borrowing facilities with Citi companies, or to pay for purchases from an eligible Citi account with a debit card at the merchant point-of-sale), or participating in payment clearing and settlement systems in association with other financial institutions;
- servicing your transactions with merchants who accept a Citi *MasterCard* or private label credit card account as the method of payment for goods and services you purchase from them;
- managing various banking, financial and wealth management services benefits and various Citi Commercial Card and private label credit card benefits, including insurance, loyalty and rewards programs;

- distributing information and/or promotional offers to you related to the products and services you have with Citi;
- managing corporate and business cardmember accounts;
- bill payment services;
- debt collection activities on accounts you maintain with us;
- assistance to third parties or investigative bodies to help prevent fraud, money laundering or other criminal activity; and
- any other activities relating to the servicing or administration of the accounts, products and services you have with Citi, or as otherwise permitted or required by law.

Some of our service providers (including our affiliates acting in that capacity) that process or handle personal information on our behalf are located outside of Canada. As a result, your personal information may be transferred, stored and/or processed outside Canada in connection with the purposes described in this Section A of the Privacy Statement. The contractual or other measures we use to protect your personal information are subject to the legal requirements of the foreign jurisdictions where your personal information may be transferred, stored or processed (for example, a legal requirement to disclose personal information to government authorities in those foreign jurisdictions).

Affiliates With Whom We May Share Personal Information:

Our affiliates are the family of companies that form part of Citigroup. A complete list of our affiliates is available from the Privacy Officer at the address or telephone number indicated in the *Contacting Citi About Another Request* section of Section A of this Privacy Statement.

Citi and its affiliates share with each other “marketing lists” - lists of customers who meet certain general, non-sensitive criteria. This information may include your name, address, category of income, gender, preferred language of communication, preferences, needs or interests. The sharing of such information is done in order to assist our affiliates to offer products and services that may be of interest to you. We are not sharing specific financial information or medical or other sensitive information with our affiliates, except when our affiliates are acting for us as service providers, when we are authorized by law or if we have your consent. If you prefer that we not share our marketing lists containing your name and information about you with our affiliates, you may contact us at the appropriate address or telephone number mentioned in the *Contacting Citi About Another Request* section of this Section A, below, allowing for a reasonable time for the withdrawal of your name and that information.

Some of our affiliates described above may be located outside of Canada, and personal information disclosed to those affiliates will be subject to the laws of the foreign jurisdictions where those affiliates are located.

Please note that if you use products or services offered by one or more Citi company (or by one or more of our Citigroup affiliates in Canada), you will need to separately notify each Citi company (and each Citigroup affiliate in Canada) with whom you have a business relationship if you do not want such information shared with other Citi companies (or Citigroup affiliates in Canada), or if you want to be removed from their marketing lists.

Third Parties With Whom We May Share Personal Information:

Note: *This section does not apply to individual customers of Citibank N.A. (Canadian Branch) unless they expressly give Citi consent to share their personal information with third parties for the purposes described in this section. Citibank N.A. (Canadian Branch) customers may give their consent by calling the Citibank N.A. (Canadian Branch) Privacy Officer at 1-416-947-5500.*

From time to time, we may disclose personal information, through marketing lists, to selected companies or organizations to allow them to offer you directly goods and services that may be of interest to you. These marketing lists contain very general and non-sensitive information such as names, addresses and telephone numbers, and categories of goods and services reflecting your preferences and interests. In no case will sensitive information about you, including specific financial data or credit ratings, be disclosed without your express positive consent. These selected companies and organizations will also be formally prohibited from disclosing the information to third parties or using it for another purpose without obtaining appropriate consent in advance.

If you prefer to be removed from the marketing lists we may share with third parties, you are free to opt-out at any time by contacting us at the appropriate address or telephone number mentioned in the *Contacting Citi About Another Request* section of this Section A, below. Please allow a reasonable time for your withdrawal request to become effective.

Business Transactions: From time to time, we may contemplate or participate in various business transactions that might involve access to your personal information by other participants in those business transactions. Personal information may be used by Citi and disclosed to parties connected with certain business transactions, including the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of Citi’s business or assets, for the purposes of evaluating and/or performing those proposed business transactions. These purposes may include:

- permitting those parties to determine whether to proceed or continue with a proposed business transaction;
- fulfilling inspection, reporting or audit requirements or obligations to those parties; and
- permitting those parties to use and disclose your personal information for substantially the same purposes as described in this Section A of the Privacy Statement.

Consent: Depending on the nature and sensitivity of your personal information, your consent to the collection, use or disclosure of such information can be express and positive (express and positive consent may be oral, in writing or electronic) or implied (such as by using or maintaining one of our products or services or by not responding to our offer to remove your personal information from our marketing list, in which case we assume that you consent). Consent may be given by your authorized representative. You may withdraw your consent at any time as long as you give reasonable notice of withdrawal. To withdraw your consent, please contact the appropriate Citi company at the address or telephone number mentioned in the *Contacting Citi About Another Request* section of this Section A., below:

Note: *By opening, using or maintaining an account with us, you are consenting to us establishing and*



maintaining a file of personal information about you and obtaining and exchanging, from time to time, all information about you (including credit information) with our branches, affiliates and agents and with any credit reporting agency, credit bureau, person or corporation with whom you have or may have financial relations, government or regulatory agency, or supplier of services or benefits relating to your account for the purposes described in this Section A of the Privacy Statement.

Withdrawal or refusal of consent is subject to legal and contractual restrictions. Citi can collect, use or disclose your personal information without your consent for legal, security, or certain processing reasons when authorized by law. For example, your consent is not required when collecting or exchanging your personal information to deter fraud, money laundering or other criminal activity, and upon approval of your application, consent may not be withdrawn as it relates to processing, collecting or reporting your account information. Where permitted or required by law, we may collect, use or disclose your personal information without your consent, for example to collect a debt. Please note that if you withdraw your consent, we may not be able to provide some products or services to you.

Please remember that your telephone conversations with our representatives may be monitored and/or recorded for quality control, internal training and record keeping purposes. As well, please remember that we and our affiliates and third parties with whom we share your personal information in accordance with this Privacy Statement may contact you by telephone, using the telephone number information you have provided to us.

Please also remember that during the term of a loan or credit facility you have with us, you may not withdraw your consent to our ongoing collection, use or disclosure of your personal information in connection with the loan or credit facility. This inability also applies to our continuing disclosure of your personal information to credit bureaus after your loan or credit facility has been retired. This ongoing disclosure assists with the maintenance, accuracy, completeness and integrity of the Canadian credit reporting system.

Accessing Your File: We will establish and maintain a file of personal information for each applicant and customer. In doing so, it is your responsibility to inform us of any changes whatsoever that could affect the status of your accounts or services with us. Your file will be kept by us and will be accessible at Citi. Only our employees, agents and mandataries who need to access your file in the course of their duties will have access to your file. You have the right to access your file and request rectification of any personal information in the file that may be obsolete, incomplete or incorrect. We want to make this as simple as possible for you. You can obtain the *Customer Access to Personal Information Request* form from us by contacting the appropriate Citi company at the address or telephone number mentioned in the *Contacting Citi About Another Request* section of this Section A, below. We will need to validate the identity of anyone making such a request to ensure that we do not provide your personal information to anyone who does not have the right to that information. We may charge you an administration fee for providing access to your file in accordance with your request. Normally, we will respond to access or rectification requests within 30 days.

Please note that, in certain circumstances, we may not be able to provide you with access to specific portions of file information

about you. For example, we will not provide you with access to the following information:

- information containing references to other persons;
- information containing our confidential or proprietary information;
- information that has been destroyed; or
- information that is too costly to retrieve, such as information that is dated and archived.

Protecting Your Personal Information: Personal information in our possession may be kept in electronic or paper format in our offices or in third party provider facilities. Personal information may also be kept in secure offsite storage facilities.

We have policies, procedures, guidelines, and safeguards in place at Citi to ensure that your personal information is protected. Security measures such as passwords, restricted access to our offices and records, physical access security, and file encryption have been put in place to protect your personal information against unauthorized access, theft or misuse.

Each Citi employee is responsible for ensuring the confidentiality of all personal information accessed. As a condition of employment, every employee must sign a code of conduct, which includes comprehensive provisions ensuring the protection of your personal information.

Any personal information collected from you will be used for the purposes identified at the time of collection and will be retained for as long as is necessary to fulfill the service, or as required by law. We do not collect any personal information from visitors browsing our websites, although personal information may be requested if a visitor chooses to send us an email message.

Filing a Service or Privacy Complaint With Citi:

Note: *To file an opt-out request, to request access to your personal information or request more information about an account or service you have with us, or to report incorrect personal information, please refer to the **Contacting Citi About Another Request** section of this Section A, below.*

If we fail to resolve a service complaint about an account or service you have with us to your satisfaction or within a reasonable delay, or if you have a complaint or concern about privacy, please contact us at the following address or telephone number:

Citibank Canada Accounts, Citigroup Private Banking Services, Citi Commercial Card Accounts:

Citibank Canada
123 Front Street West, Suite 1700
Toronto, Ontario M5J 2M3
Attention: Privacy Officer
Telephone: 1-888-245-1112

Citibank N.A. (Canadian Branch) Accounts:

Citibank N.A. (Canadian Branch)
123 Front Street West, Suite 1700
Toronto, Ontario M5J 2M3
Attention: Privacy Officer
Telephone: 1-416-947-5500



Citi Trust Company Canada Trustee Services:

Citi Trust Company Canada
2920 Matheson Blvd. East
Mississauga, Ontario L4W 5J4
Telephone: 1-519-680-4832

Citi Cards Canada Inc. Retail MasterCard or Private Label Accounts:

Citi Cards Canada Inc.
P.O. Box 2050, Station B
Mississauga, Ontario L4Y 0B3
Attention: Privacy Officer
Telephone: *Retail MasterCard:* 1-866-815-2911
Retail Private Label: 1-800-233-8557
Home Depot Credit Services: 1-800-747-3787

CitiFinancial Accounts:

CitiFinancial Canada, Inc.
5900 Hurontario Street
Mississauga, Ontario L5R 0B8
Attention: Privacy Officer
Telephone:
Branch Network: 1-800-922-6235
Retail Services: 1-888-638-2274
Citicorp Home Mortgage: 1-800-741-9308

Citi Prepaid Cards:

Citibank Processing Centre
P.O. Box 284
Conshohocken, Pennsylvania
U.S.A. 19428
Attention: Privacy Officer
Telephone: 1-800-774-6995

To forward a privacy complaint by email for any of the companies mentioned in this Section A of the Privacy Statement, please email us at: Canada.Privacy.Office@citi.com.

Contacting Citi About Another Request: To file an opt-out request, request access to your personal information, report incorrect personal information, or to obtain information about our policies and practices including our use of third parties and affiliates with whom we share your personal information, please contact us at:

Note: *You must file an opt-out request with each Citigroup Canada company to which you want an opt-out request to apply. If you have already filed an opt-out request in the past at a Citigroup Canada company with whom you have an account or service, there is no need to file another opt-out request with that Citigroup Canada company.*

Citibank Canada Accounts:

Citibank Canada
123 Front Street West, Suite 1700
Toronto, Ontario M5J 2M3
Attention: Privacy Officer
Telephone: 1-416-947-5500

Citi Commercial Card Accounts:

Citi Cards Canada Inc.

5900 Hurontario Street
Mississauga, Ontario L5R 0B8
Attention: Privacy Officer
Telephone: 1-888-834-2484

Citibank N.A. (Canadian Branch) Accounts:

Citibank, N.A. (Canadian Branch)
123 Front Street West, Suite 1700
Toronto, Ontario M5J 2M3
Attention: Privacy Officer
Telephone: 1-416-947-5500

Citi Trust Company Canada Trustee Services:

Citi Trust Company Canada
2920 Matheson Blvd. East
Mississauga, Ontario L4W 5J4
Attention: Privacy Officer
Telephone: 1-519-680-4832

Citigroup Private Banking Services:

The Citigroup Private Bank
Citibank Canada
123 Front Street, Suite 2000
Toronto, Ontario M5J 2M3
Attention: Privacy Officer
Telephone: 1-416-947-5500

Citi Prepaid Cards:

Citibank Processing Centre
P.O. Box 284
Conshohocken, Pennsylvania
U.S.A. 19428
Attention: Privacy Officer
Telephone: 1-800-774-6995

To request more information about your Citi Prepaid card, you can visit the Prepaid Website at www.prepaid.citi.com or call us toll-free at 1-800-774-6995.

Citi Cards Canada Inc. – Retail MasterCard or Private Label Accounts:

Citi Cards Canada Inc.
P.O. Box 2050, Station B
Mississauga, Ontario L4Y 0B3
Attention: Privacy Officer
Telephone: *Retail MasterCard:* 1-866-815-2911
Retail Private Label: 1-800-233-8557
Home Depot Credit Services: 1-800-747-3787

CitiFinancial Accounts:

Branch Network
CitiFinancial Canada Inc.
630 Rene Levesque Blvd. West
Suite 1300
Montreal, Quebec H3B 4Z9
Attention: Privacy Officer
Telephone: 1-800-922-6235

Retail Services

CitiFinancial Retail Services



(Division of CitiFinancial Canada Inc.)
P.O. Box 920, Station B
Toronto, Ontario M9W 7H5
Attention: Privacy Officer
Telephone: 1-888-638-2274

Citicorp Home Mortgage

Citicorp Home Mortgage
(Division of CitiFinancial Canada Inc.)
5900 Hurontario Street
Mississauga, Ontario L5R 0B8
Attention: Privacy Officer
Telephone: 1-800-741-9308

To request more information about your CitiFinancial account, you can visit the CitiFinancial Canada website at www.citifinancial.ca or call us toll-free at the telephone number noted above that applies to your CitiFinancial account.

We will investigate all complaints and will generally respond within 30 days of receipt of your complaint. If we find a complaint to be justified, we will take all appropriate measures, including, if necessary, amending our policies and practices.

SECTION B

General: This Section B of the Privacy Statement applies only to Citigroup Fund Services Canada, Inc. This company will be referred to as “Citigroup Fund Services” or, depending on the context, as “we”, “our”, or “us”, in this Section B of the Privacy Statement. As well, in this Section B of the Privacy Statement, “CFSC Clients” mean our institutional clients, which include Canadian chartered banks, mutual fund companies, insurance companies and other financial institutions; and “you” and “your” means an individual customer of a CFSC Client.

In our capacity as a provider of third party administration services (including unit holder recordkeeping and fund valuation services) and transfer agency system services (through service bureau, facilities managed services or software license) to CFSC Clients, our CFSC Clients provide us with access to your personal information. The CFSC Clients you have business dealings with have a responsibility to obtain your personal information as well as your consent for its use. Typically, your consent is obtained by the CFSC Clients you have business dealings with at the time of account opening, either through the application process, by means of verbal consent, or in some form of disclosure document. In addition, as part of our services provided to CFSC Clients, we routinely collect and process your personal information in connection with your business dealings with CFSC Clients. There may also be occasions when we collect personal information about you directly from you, or from your advisors or dealers, credit bureaus or other financial institutions. In these instances, we would ensure the necessary consent has been obtained before collecting and using your personal information in the ways set out in this Section B of the Privacy Statement.

Categories of Personal Information We Collect and Hold: The nature of personal information we collect and hold about you may include:

- information we receive about you from CFSC Clients in connection with your business dealings with CFSC Clients and the services we provide to those CFSC Clients;
- information we receive about you on applications, accounts or other forms, such as name, gender, date of birth, address,

telephone number, email address, occupation, assets, income, language preference and personal identification information (such as government-issued identification, social insurance number, driver’s license, passport and/or, where permitted, provincial health insurance card);

- information we receive directly from you on a volunteer basis in connection with your business dealings with CFSC Clients and the services we provide to those CFSC Clients;
- information about your transactions with CFSC Clients or third parties, such as account numbers, account balances, account or service activity, and payment records and history; and
- reports we receive from credit bureaus.

We are not collecting any sensitive information from CFSC Clients or third parties, such as medical information, detailed information regarding specific purchases of goods or services, or information concerning customer preferences, needs or interests where a reasonable person would expect the subject matter to cause offence or embarrassment.

We have established policies and procedures pertaining to the retention and destruction of the personal information that we hold about you.

Purposes of Collecting Your Personal Information: We may use the personal information we collect about you for the following purposes:

1. to verify your identity;
2. in the case of a social insurance number, for credit bureau file matching purposes only;
3. to determine your eligibility for a product or service;
4. to ensure that our records about you and your business dealings with CFSC Clients and third parties are accurate;
5. to establish and administer your accounts and other business dealings with CFSC Clients and third parties;
6. to execute transactions on your accounts with CFSC Clients;
7. to maintain, store, record and determine your account holdings and transaction records with CFSC Clients and third parties;
8. to respond to your inquiries about your accounts with CFSC Clients or other services;
9. to provide you and your authorized advisors with account statements and other information;
10. to provide you with financial statements, tax receipts, proxy mailings, transaction confirmations and other information that may be requested or needed to service your accounts with CFSC Clients;
11. to understand your needs and to provide you with quality customer service and support;
12. to meet legal, security, processing and regulatory requirements, including Canadian federal and provincial requirements and foreign requirements applicable to us or any of our affiliates or service providers;
13. to protect our interests and the interests of CFSC Clients in areas such as account/service errors or omissions, fraud,

money laundering and other criminal activity, and debt recovery; and

14. such other purposes as we disclose in this Section B of the Privacy Statement or that we identify to you from time to time or as permitted by law.

We may also use or disclose personal information for other purposes with your consent, or as otherwise permitted or required by law (see *Consent* section, below).

Disclosures of Your Personal Information: In common with many organizations, we keep our costs down by obtaining some routine services from service providers, and your personal information may be provided to them. These service providers must sign a confidentiality agreement and may only use the information disclosed to them for the specific purposes mentioned in the agreement, after which they must return this information to us or destroy it, without keeping a copy. These disclosures to service providers may be for:

- account statement preparation, printing and other administrative services;
- legal, regulatory and compliance purposes, including Canadian federal and provincial requirements and foreign requirements applicable to us or any of our affiliates or service providers;
- updating of information to credit bureaus;
- participating in payment clearing and settlement systems in association with other financial institutions;
- servicing your account transactions and other services with CFSC Clients with whom you have business dealings;
- distributing information and/or promotional offers to you related to the products and services you have with CFSC Clients;
- debt collection activities in respect to amounts you owe to us or CFSC Clients;
- assistance to third parties or investigative bodies to help prevent fraud, money laundering or other criminal activity; and
- any other activities relating to the servicing or administration of the accounts, products and services you have with CFSC Clients, or as otherwise permitted or required by law.

Some of our service providers (including our affiliates acting in that capacity) that process or handle personal information on our behalf are located outside of Canada. As a result, your personal information may be transferred, stored and/or processed outside Canada in connection with the purposes described in this Section B of the Privacy Statement. The contractual or other measures we use to protect your personal information are subject to the legal requirements of the foreign jurisdictions where your personal information may be transferred, stored or processed (for example, a legal requirement to disclose personal information to government authorities in those foreign jurisdictions).

Business Transactions: From time to time, we may contemplate or participate in various business transactions that might involve access to your personal information by other participants in those business transactions. Personal information may be used by us and disclosed to parties connected with certain business transactions, including the sale, assignment or other disposal of all or part of our

business or assets, for the purposes of performing those proposed business transactions. These purposes may include permitting those parties to use and disclose your personal information for substantially the same purposes as described in this Section B of the Privacy Statement.

Consent: Depending on the nature and sensitivity of your personal information, your consent to the collection, use or disclosure of such information can be express and positive (express and positive consent may be oral, in writing or electronic) or implied, in which case we assume that you consent. Your authorized representative may give consent. You may withdraw your consent at any time as long as you give reasonable notice of withdrawal to the provider of the product or service to which the withdrawal of consent relates. To withdraw your consent as it relates to the collection, use or disclosure of your personal information by us, please contact us at the address or telephone number mentioned in the *Contacting Citigroup Fund Services About a Privacy Complaint or Another Request* section of this Section B, below.

Withdrawal or refusal of consent is subject to legal and contractual restrictions. We can collect, use or disclose your personal information without your consent for legal, security, or certain processing reasons when authorized by law. For example, your consent is not required when collecting or exchanging your personal information to deter fraud, money laundering or other criminal activity. Where permitted or required by law, we may collect, use or disclose your personal information without your consent, for example to collect a debt. Please note that any decision to withdraw your consent or withhold personal information may limit the services or products we and/or CFSC Clients may be able to provide to you.

Please remember that your telephone conversations with our representatives may be monitored and/or recorded for quality control, internal training and record keeping purposes. As well, please remember that we and our affiliates and third parties with whom we share your personal information in accordance with this Privacy Statement may contact you by telephone, using the telephone number information you have provided to us.

Accessing Your File: We will establish and maintain a file of personal information for you in connection with the servicing or administration of the accounts, products and services you have with CFSC Clients. In doing so, it is your responsibility to inform the CFSC Clients with whom you have business dealings and us of any changes whatsoever that could affect the status of your accounts or services with those CFSC Clients and us. Your file will be kept by us and will be accessible at Citigroup Fund Services. Only our employees, agents and mandataries who need to access your file in the course of their duties will have access to your file. You have the right to access the file that we maintain about you and request rectification of any personal information in the file that may be obsolete, incomplete or incorrect. We want to make this as simple as possible for you. You can contact us any time during normal business hours at our address or telephone number mentioned in the *Contacting Citigroup Fund Services About a Privacy Complaint or Another Request* section of this Section B, below. We will need to validate the identity of anyone making such a request to ensure that we do not provide your personal information to anyone who does not have the right to that information. We may charge you an administration fee for providing access to your file in accordance with your request. Normally, we will respond to access or rectification requests within 30 days.

Please note that, in certain circumstances, we may not be able to provide you with access to specific portions of file information



about you. For example, we will not provide you with access to the following information:

- information containing references to other persons;
- information containing proprietary information confidential to us or to CFSC Clients;
- information that has been destroyed; or
- information that is too costly to retrieve, such as information that is dated and archived.

Protecting Your Personal Information: Personal information in our possession may be kept in electronic or paper format in our offices or in third party provider facilities. Personal information may also be kept in secure offsite storage facilities.

We have policies, procedures, guidelines, and safeguards in place at Citigroup Fund Services to ensure that your personal information is protected. Security measures such as passwords, restricted access to our offices and records, physical access security, and file encryption have been put in place to protect your personal information against unauthorized access, theft or misuse.

Each Citigroup Fund Services employee is responsible for ensuring the confidentiality of all personal information accessed. As a condition of employment, every employee must sign a code of conduct, which includes comprehensive provisions ensuring the protection of your personal information.

Any personal information collected from you will be used for the purposes identified at the time of collection and will be retained for as long as is necessary to fulfill the service, or as required by law.

Contacting Citigroup Fund Services About a Privacy Complaint or Another Request: To file a privacy complaint or an opt-out request, request access to your personal information, report incorrect personal information, or to obtain information about our policies and practices including our use of service providers with whom we share your personal information, please contact us at:

Citigroup Fund Services Canada Inc.
2920 Matheson Blvd. East
Mississauga, Ontario, L4W 5J4
Attention: Privacy Officer
Telephone: 1-800-648-1977

To forward a privacy complaint by email for Citigroup Fund Services, please email us at: Canada.Privacy.Office@citi.com.

Note: *You must file an opt-out request with each Citigroup Canada company to which you want an opt-out request to apply. If you have already filed an opt-out request in the past at a Citigroup Canada company with whom you have an account or service, there is no need to file another opt-out request with that Citigroup Canada company.*

We will investigate all complaints and will generally respond within 30 days of receipt of your complaint. If we find a complaint to be justified, we will take all appropriate measures, including, if necessary, amending our policies and practices.

SECTION C

General: This Section C of the Privacy Statement applies only to Triton Insurance Company and American Health and Life

Insurance Company. These companies will collectively be referred to as “the Insurers” or, depending on the context, as “we”, “our”, or “us”, in this Section C of the Privacy Statement. As well, in this Section C of the Privacy Statement, “CitiFinancial” means CitiFinancial Canada, Inc., and “you” and “your” means an individual customer of the Insurers and/or CitiFinancial.

Categories of Personal Information We Collect and Hold: The nature of personal information we collect and hold about you may include:

- information we receive from you on applications for insurance, insurance claim forms and other forms such as name, gender, date of birth, address, telephone number, email address, occupation, employer, particulars of employment, assets, income, language preference and other personal identification information (such as government-issued identification, social insurance number, driver’s license, passport and/or, where permitted, provincial health insurance card);
- information we receive from you on a volunteer basis when we are conducting a survey of your preferences, needs or interests;
- information we receive from CitiFinancial with respect to credit that you have obtained from CitiFinancial;
- information about your transactions with us, CitiFinancial, or third parties, such as account numbers, account balances, the CitiFinancial branch servicing the credit you have obtained from CitiFinancial, payment history, and account activity;
- information we receive from your employer;
- reports we receive from credit bureaus;
- information we receive from program partners and service providers with or for whom we provide insurance products and services to you;
- information we receive from you or third parties (including hospitals, clinics and other medical facilities, physicians and other health care providers) about your health, including particulars of medical conditions, diagnosis and treatment; physician’s contact information and records of visits;
- information relevant to your credit, insurance, and any other products or services you request from time to time; and
- information from your employer, physician and lending institution as required to process your application or claim.

From time to time, we also collect additional personal information about you regarding the current status of your account and/or insurance from CitiFinancial and generally for administering the insurance on your account. Where CitiFinancial provides us with your social insurance number and indicates that you have consented, we may use your social insurance number for identification purposes, namely to ensure an accurate match of your application with our existing records. If required we may share your social insurance number with your present employer or with the Department of Human Resources and Social Development Canada for verification of employment information.

For purposes of evaluating, assessing, investigating and processing any insurance claims you submit, we may also collect additional information about you from the following sources:

- physicians and other medical and health care practitioners and providers;
- hospitals, clinics and other medical facilities;
- provincial and territorial Worker's Compensation Boards;
- Department of Human Resources and Social Development Canada (formerly Human Resources Development Canada);
- licensed agents, mandataries, insurance brokers, intermediaries and financial services representatives with whom you have a relationship;
- employers;
- adjusters, investigators, inspectors, and police; and
- our affiliates, including CitiFinancial.

Except as noted above in the case of medical information, we are not collecting any sensitive information from our affiliates or third parties, such as detailed information regarding specific purchases of goods or services, or information concerning customer preferences, needs or interests where a reasonable person would expect the subject matter to cause offence or embarrassment.

We have established policies and procedures pertaining to the retention and destruction of the personal information that we hold about you.

Purposes of Collecting Your Personal Information: We may use the personal information we collect about you for the following purposes:

1. to establish your identity;
2. in the case of a social insurance number, for credit bureau file matching purposes only;
3. to determine your eligibility and processing your applications for insurance or other services we offer;
4. to evaluate, assess, and investigate your application, our insurance risks, and any claims you submit to us;
5. to administer and service the insurance products we provide to you;
6. to respond to your inquiries about applications, insurance products and other services.
7. to meet legal, security, processing and regulatory requirements, including Canadian federal and provincial requirements and foreign requirements applicable to us or any of our affiliates or service providers;
8. to understand your needs and to offer products and services to meet those needs;
9. to allow our affiliates and selected companies to promote their products and services to you; and
10. such other purposes as we disclose in this Section C of the Privacy Statement or that we identify to you from time to time or as permitted by law.

You may refuse or withdraw your consent to 9. above, as explained in this Section C of the Privacy Statement. We may also use or disclose personal information for other purposes with your consent, or as otherwise permitted or required by law (see *Consent* section, below).

Disclosures of Your Personal Information: In common with many organizations, we keep our costs down by obtaining some routine services from service providers, and your personal information may be provided to them. These service providers must sign a confidentiality agreement and may only use the information disclosed to them for the specific purposes mentioned in the agreement, after which they must return this information to the Insurers or destroy it, without keeping a copy. These disclosures to service providers may be for:

- statement preparation, printing and other administrative services;
- data processing and market research services;
- insurance underwriting and related functions or services;
- legal, regulatory and compliance purposes, including Canadian federal and provincial requirements and foreign requirements applicable to us or any of our affiliates or service providers;
- updating of information to credit bureaus;
- participating in payment systems and networks (e.g. the electronic networks that allow consumers to pay their credit card accounts, loans or other borrowing facilities with CitiFinancial, or participating in payment clearing and settlement systems in association with other financial institutions;
- distributing information and/or promotional offers to you related to the products and services you have with us;
- managing your insurance benefits and claims administration services;
- bill payment services;
- debt collection activities in connection with amounts you owe to us;
- assistance to third parties or investigative bodies to help prevent fraud, money laundering or other criminal activity; and
- any other activities relating to the servicing or administration of the products and services you have with us, or as otherwise permitted or required by law.

Some of our service providers (including our affiliates acting in that capacity) that process or handle personal information on our behalf are located outside of Canada. As a result, your personal information may be transferred, stored and/or processed outside Canada in connection with the purposes described in this Section C of the Privacy Statement. The contractual or other measures we use to protect your personal information are subject to the legal requirements of the foreign jurisdictions where your personal information may be transferred, stored or processed (for example, a legal requirement to disclose personal information to government authorities in those foreign jurisdictions).

Your personal information may be disclosed to the entities and persons identified in the *Purposes of Collecting Your Personal Information* section of this Section C, above for the purposes of obtaining the information required, and may otherwise be disclosed to our affiliates and your advisor of record.

Affiliates With Whom We May Share Personal Information: Our affiliates are the family of companies that form part of

Citigroup. A complete list of our affiliates is available from the Privacy Officer at the address or telephone number indicated in the *Contacting the Insurers About a Privacy Complaint or Another Request* section of this Section C of the Privacy Statement.

The Insurers and its affiliates (including CitiFinancial) share with each other “marketing lists” - lists of customers who meet certain general, non-sensitive criteria. This information may include your name, address, category of income, gender, preferred language of communication, preferences, needs or interests. The sharing of such information is done in order to assist our affiliates to offer products and services that may be of interest to you. We are not sharing specific financial information or medical or other sensitive information with our affiliates, except when our affiliates are acting for us as service providers, when we are authorized by law or if we have your consent. If you prefer that we not share our marketing lists containing your name and information about you with our affiliates, you may contact us at the appropriate address or telephone number mentioned in the *Contacting the Insurers About a Privacy Complaint or Another Request* section of this Section C, below, allowing for a reasonable time for the withdrawal of your name and that information.

Some of our affiliates described above may be located outside of Canada, and personal information disclosed to those affiliates will be subject to the laws of the foreign jurisdictions where those affiliates are located.

Please note that if you use products or services offered by one or more of our Citigroup affiliates in Canada, you will need to separately notify each Citigroup affiliate with whom you have a business relationship if you do not want such information shared with other Citigroup affiliates or if you want to be removed from their marketing lists.

Third Parties With Whom We May Share Personal Information: From time to time, we may disclose personal information, through marketing lists, to selected companies or organizations to allow them to offer you directly goods and services that may be of interest to you. These marketing lists contain very general and non-sensitive information such as names, addresses and telephone numbers, and categories of goods and services reflecting your preferences and interests. In no case will sensitive information about you, including specific financial data or credit ratings, be disclosed without your express positive consent. These selected companies and organizations will also be formally prohibited from disclosing the information to third parties or using it for another purpose without obtaining appropriate consent in advance.

If you prefer to be removed from the marketing lists we may share with third parties, you are free to opt-out at any time by contacting us at the appropriate address or telephone number mentioned in the *Contacting the Insurers About a Privacy Complaint or Another Request* section of this Section C, below. Please allow a reasonable time for your withdrawal request to become effective.

Business Transactions: From time to time, we may contemplate or participate in various business transactions that might involve access to your personal information by other participants in those business transactions. Personal information may be used by us and disclosed to parties connected with certain business transactions, including the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of our business or assets, for the purposes of evaluating and/or performing those proposed business transactions. These purposes may include:

- permitting those parties to determine whether to proceed or continue with a proposed business transaction;
- fulfilling inspection, reporting or audit requirements or obligations to those parties; and
- permitting those parties to use and disclose your personal information for substantially the same purposes as described in this Section C of the Privacy Statement.

Consent: Depending on the nature and sensitivity of your personal information, your consent to the collection, use or disclosure of such information can be express and positive (express and positive consent may be oral, in writing or electronic) or implied (such as by using or maintaining one of our products or services or by not responding to our offer to remove your personal information from our marketing list, in which case we assume that you consent). Your authorized representative may give consent. You may withdraw your consent at any time as long as you give reasonable notice of withdrawal. To withdraw your consent, please contact us at the address or telephone number mentioned in the *Contacting the Insurers About a Privacy Complaint or Another Request* section of this Section C, below.

Withdrawal or refusal of consent is subject to legal and contractual restrictions. We can collect, use or disclose your personal information without your consent for legal, security, or certain processing reasons when authorized by law. For example, your consent is not required when collecting or exchanging your personal information to deter fraud, money laundering or other criminal activity, and upon approval of your application, consent may not be withdrawn as it relates to processing, collecting or reporting your account information. Where permitted or required by law, we may collect, use or disclose your personal information without your consent, for example to collect a debt. Please note that if you withdraw your consent, we may not be able to provide some products or services to you.

Please remember that your telephone conversations with our representatives may be monitored and/or recorded for quality control, internal training and record keeping purposes. As well, please remember that we and our affiliates and third parties with whom we share your personal information in accordance with this Privacy Statement may contact you by telephone, using the telephone number information you have provided to us.

Accessing Your File: We will establish and maintain a file of personal information for each applicant and customer. In doing so, it is your responsibility to inform us of any changes whatsoever that could affect the status of your accounts or services with us. Your file will be kept by us and will be accessible at the Insurers. Only our employees, agents and mandataries who need to access your file in the course of their duties will have access to your file. You have the right to access your file and request rectification of any personal information in the file that may be obsolete, incomplete or incorrect. We want to make this as simple as possible for you. You can obtain the *Customer Access to Personal Information Request* form from us by contacting us at the address or telephone number mentioned in the *Contacting the Insurers About a Privacy Complaint or Another Request* section of this Section C, below. We will need to validate the identity of anyone making such a request to ensure that we do not provide your personal information to anyone who does not have the right to that information. We may charge you an administration fee for providing access to your file in accordance with your request. Normally, we will respond to access or rectification requests within 30 days.



Please note that, in certain circumstances, we may not be able to provide you with access to specific portions of file information about you. For example, we will not provide you with access to the following information:

- information containing references to other persons;
- information containing our confidential or proprietary information;
- information that has been destroyed; or
- information that is too costly to retrieve, such as information that is dated and archived.

Protecting Your Personal Information: Personal information in our possession may be kept in electronic or paper format in our offices or in third party provider facilities. Personal information may also be kept in secure offsite storage facilities.

We have policies, procedures, guidelines, and safeguards in place at the Insurers to ensure that your personal information is protected. Security measures such as passwords, restricted access to our offices and records, physical access security, and file encryption have been put in place to protect your personal information against unauthorized access, theft or misuse.

Each employee of the Insurers is responsible for ensuring the confidentiality of all personal information accessed. As a condition of employment, every employee must sign a code of conduct, which includes comprehensive provisions ensuring the protection of your personal information.

Any personal information collected from you will be used for the purposes identified at the time of collection and will be retained for as long as is necessary to fulfill the service, or as required by law.

Contacting the Insurers About a Privacy Complaint or Another Request: To file a privacy complaint or an opt-out request, request access to your personal information, report incorrect personal information, or to obtain information about our policies and practices including our use of third parties and affiliates with whom we share your personal information, please contact us at:

Triton Insurance Company
American Health and Life Insurance Company
355 Wellington Street
London, Ontario N6A 3N7
Attention: Privacy Officer
Telephone: 1-800-285-8623

To forward a privacy complaint by email for either of the insurance companies mentioned in this Section C of the Privacy Statement, please email us at: Canada.Privacy.Office@citi.com.

Note: *You must file an opt-out request with each Citigroup Canada company to which you want an opt-out request to apply. If you have already filed an opt-out request in the past at a Citigroup Canada company with whom you have an account or service, there is no need to file another opt-out request with that Citigroup Canada company.*

We will investigate all complaints and will generally respond within 30 days of receipt of your complaint. If we find a complaint to be justified, we will take all appropriate measures, including, if necessary, amending our policies and practices.

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