

Protecting Your Privacy

At Innovation Federal Credit Union (“Innovation”, “we”, “our”, “us”), we are committed to protecting your personal information. “Personal information” (or “your information”) means information about an identifiable individual.

This Privacy Code outlines the scope of personal information we collect, what we do with it, the measures we take to keep it safe, and your rights related to controlling the use of your information. It does not apply to business contact or anonymized information.

The terms of this Privacy Code apply in all your interactions with us, including when you apply for or receive our products and services, visit our website, or communicate with us.

Collecting and Using Your Information

Types of Information We Collect

The types of information we collect depend on what you choose to provide when you interact with us, and what products or services we are providing.

We collect the following types of information:

- **Contact information**, which allows us to communicate with you. This can include information like your name, address, email, and phone number.
- **Authentication and account information**, which allows us to verify your identity and open your account. This includes your login information, date of birth, and identity documents that confirm information about you. We may also verify your identity or authenticate your account access using analysis of your online activity, device information (including the device’s browser and operating system) IP address, and location (if enabled on your device). Information about the approximate physical location of your device may provide a location-dependent service such as to allow you to locate a nearby ATM or advice centre; to validate user identity; and to prevent, suppress, or detect crime.
- **Background and biographical information** to assess and manage risk, confirm your eligibility for products, comply with legal requirements, and help us serve you better. We use sophisticated techniques and tools to gain a deeper knowledge of your needs, generate personal product and service recommendations, as well as to develop new products and services overall. This background information includes details about your citizenship, residence status, your primary business or occupation, your employment history, gender and marital status, income, and your tax identification number.
- **Financial and transaction information** that allow us to assess your eligibility for products and services and, if appropriate, offer and provide them. This includes your annual income, investments, account balances, financial behaviour, assets and liabilities, transaction history, financial objectives and details of security provided for loans. We also collect credit reports and other credit information from you or credit bureaus. Some types of financial and transaction information, like credit information, is updated periodically to assess ongoing eligibility and risk factors.
- **Social Insurance Number (SIN)**, to comply with legal and regulatory requirements, like tax laws. Note that you can also choose to provide your SIN for credit bureau matching purposes, which helps ensure the credit information we obtain is accurate.
- **Your preferences and online activity**, such as your contact and language preferences which allow us to improve and personalize your experience. We use cookies and similar tools to improve our website and services. We also use them to promote our products or services that may be relevant to you. See the [Online Interactions](#) section later in the document for more information.

- **Records of your interactions with us**, such as recordings of phone calls for quality assurance, dispute resolution and training purposes. In the future, we will use Voice Print to confirm your identity when you call, in accordance with our existing privacy policies.
- **Other information** which may be helpful or necessary to administer your account. 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.
- **Your image** when you provide it to us (including a picture or copy of a government-issued photo ID) as part of a customer identification process. We may also collect your image if you are recorded by security cameras at one of our locations.
- **Any other information you choose to provide** to us, such as family details, life events, goals, and issues you may have encountered.

Children under the age of 18 should not contact us or provide personal information. Children under age 18 may only provide us with information with express consent of their legal guardians. Otherwise, we do not knowingly collect personal information from children. If you believe we may have your child's information in our possession without this consent, please [contact our Privacy Officer](#) immediately.

Where We Collect Your Information

Normally we collect the information listed above from you. However, we may also obtain this information indirectly from other sources, such as:

- Credit unions, banks, insurance companies or other financial institutions, depending on the product or service in question
- Credit reporting agencies
- Government institutions or regulatory authorities (including law enforcement)
- References or similar contacts you provide us
- Referral partners

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. If you provide us with personal

information about others, such as joint account holders, you are representing that you have their consent or another legal basis to do so.

How We Use Your Information

We primarily use the types of information listed above to provide our products and services, operate our business, and comply with legal obligations. Here is a more detailed list of the reasons why we may collect and use your information:

- To provide you with our products and services
- To verify your identity and to authenticate you when you contact us, and manage our relationship with you
- To understand your financial services needs and determine your eligibility for products and services we offer, including obtaining credit reports, assessing your creditworthiness and establishing credit limits
- To operate and improve our business and minimize any errors or disruption to our services
- To communicate with you about your application, account, and any benefit, feature or other information about our products and services
- To offer products and services of our affiliates and partners
- To create statistical, aggregated or other reports, for the purpose of internal analysis
- Protect you and us against financial abuse, fraud, and other malicious activities
- To engage in investigations regarding a breach of law or legal obligations, debt collection operations, and legal proceedings
- To comply with legal and regulatory obligations and manage our risks and operations
- To contact you about community events, research or surveys we are conducting, or to provide you with newsletters and other information that may be of interest to you

- To respond to your communications, including addressing your requests and concerns

Note that some of the processes described above, including assessing your eligibility and setting credit limits for our products, are automated. If you would like to submit any questions or comments about our use of automated decision tools, you can [contact our Privacy Officer](#).

Sharing Your Information

We never sell, rent, or lease your personal information.

We primarily share your information for two main reasons: operating our business and protecting our legal interests. See below for more details.

Operating Our Business

As part of operating our business, we may:

- Transfer your information to service providers and affiliates, who help us perform internal business functions and help us provide you with products and services
- Share information with payment networks and other companies that we partner with to offer or provide products and services
- Disclose your information to companies or individuals who are providing a guaranty, indemnity or insurance in relation to a product you have with us
- Disclose information about you with others who are authorized to access information about your account, such as a joint account holder or power of attorney. The personal information we provide them depends on the scope of their authorization
- Exchange your information with credit bureaus on an ongoing basis, if you have a credit product with us. This can include information about your identity, your current and past credit accounts, your credit history, and other information that the credit bureau has collected from your other lenders. Credit bureaus may also log when we perform a credit check, like when you apply for a credit product. We also update your information with credit bureaus to help maintain the integrity of the credit reporting system

Protecting Innovation's Legal Interests

We may also share your information to protect Innovation and our legal interests. We may disclose your information:

- To respond to valid information requests from domestic and international authorities, as well as any other valid legal demand, like a subpoena or court order
- To external parties when required or permitted to do so by law, for example, to protect you or Innovation members from fraud or other malicious activity
- To meet any other legal obligations, or as part of investigating a breach of legal obligations
- To another company or individual as part of considering or completing a transaction (including the purchase or sale of a business or part of a business, a corporate reorganization, or the insuring or securitization of assets)
- For the purposes of fraud or crime prevention, suppression or detection, including managing our security risks
- To protect the safety of Innovation employees, members or other third parties

International Transfers of Information

We share your information with third parties located outside of Canada. These third parties are subject to the laws of the regions they are operating in and may be required to disclose your information in accordance with those laws, such as to law enforcement.

Online Interactions Cookies

We use a common web technology called cookies. A cookie is a small information token that sits on your computer. As you use our site, cookies are passed back and forth between our server and your browser.

You can control which cookies are accepted and how your browser uses them. For example, it may be set to notify you when it is receiving a cookie so that you accept cookies from only reliable sites such as this one.

If you are concerned about cookies, review the help

section of your browser to learn more about its control features.

Google Analytics

We use Google Analytics to better understand your use of our website. Google Analytics collects information on user behaviour on our website, which includes how many times a user visits our website, what pages they visit, and where they were referred from. Advertising identifiers for mobile devices are also collected. Google may use the data collected for its own purposes, including to contextualize and personalize the ads of its own advertising network.

To learn more about how Google uses data when you visit websites using Google Analytics, visit this site: <https://policies.google.com/technologies/partner-sites>.

You can deactivate the Google Analytics function with a browser add-on, which you can download here: <https://tools.google.com/dlpage/gaoptout>.

Facebook Pixel

We use Facebook Pixel cookies to better understand your use of our website. Facebook Pixel collects information on user behaviour on our website, which includes how many times a user visits our website, what pages they visit, and where they were referred from. Facebook uses the data collected through cookies to track and examine the use of the website, to prepare reports on its activities, and share them with other Facebook services. Advertising identifiers for mobile devices (such as Android and iOS Advertising Identifiers) are also collected. Facebook may provide us with information associated with your Facebook account, such as your likes, location and age. Facebook may use the data collected on the websites to contextualize and personalize the ads on its own advertising network.

For more information on how to limit the data Facebook Pixel shares and uses about you, visit this site: <https://www.facebook.com/help/568137493302217>.

You can read more about how Facebook Pixel works from Facebook's Data Policy (see "Information from partners"): https://www.facebook.com/privacy/policy/?entry_point=data_policy_redirect&entry=0.

Your Consent and Your Privacy Options

Your Consent

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.

Your Privacy Options

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, we will respect your request not to use the information for other purposes.

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.

Exercising Your Privacy Options

At any time, you can contact us and let us know about your privacy and communication preferences, including to opt out of us:

- Contacting you about community events and celebrations
- Contacting you for feedback about our products and services
- Sending you informative 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

- 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 1.866.446.7001
- 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 use regarding your SIN)
- By completing our email preferences form: <https://www.innovationcu.ca/email-subscription.html>

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

Retention

We will only retain your information for as long as reasonably necessary to comply with legal and regulatory requirements or to fulfill a legitimate purpose, after which point it will be removed from our records in accordance with our internal record retention and destruction processes. For more information you can [contact our Privacy Officer](#).

Safeguarding Your Information

We implement physical and technological safeguards to help 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
- Careful destruction of your information in our possession when we no longer require it for any legal or business purpose.

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

Privacy Requests, Questions and Concerns

If you have any questions or concerns, please submit them to our Privacy Officer using the information under [Contact Our Privacy Officer](#).

(10/20/2023)

However, if you are looking to access or correct your information, there may be an easier way to do so. Please review the following information first before contacting our Privacy Officer.

Accessing Your 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. You can access a lot of the information we hold about you through online banking or our mobile banking app. If the information you are looking for is not available through online or mobile banking, you can [contact our Privacy Officer](#) in writing:

Innovation Federal Credit Union
P.O. Box 1090 198 1st Ave NE
Swift Current, SK
S9H 3X3
innovationprivacyofficer@innovationcu.ca

However, sometimes there are legal and other limitations on the information we can provide you. We will let you know when these limitations exist.

Correcting and Updating Your Information

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 1.866.446.7001
- By visiting or contacting any of our Advice Centres

If these options do not allow you to correct the information in question, you can [contact our Privacy Officer](#).

Contact Our Privacy Officer

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.

If you have any questions or concerns about how we handle your personal information, or if you would like to make a request to access or correct to your information, you can contact our Privacy Officer as follows:

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 also visit any of our Advice Centres or contact our Call Centre (1.866.446.7001) for general privacy inquiries and information.

If you are not satisfied with how we have addressed your privacy concern, you can contact the Office of the Privacy Commissioner of Canada:

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

Updates To Our Privacy Code

We may update this Privacy Code from time to time to meet legislative changes, to provide greater transparency or in response to changes in our products, services or data processing activities or policies.

If there are material changes to this Privacy Code, such as a change to the way in which we use your personal information that was not anticipated originally, we will notify you either by prominently posting a notice of such changes before they take effect or by directly sending you a notification.

We encourage you to periodically review our Privacy Code to learn how we are protecting your personal information.