



HOW NIVERVILLE CREDIT UNION USES YOUR INFORMATION AND WHY WE COLLECT IT

Protecting our member's information and privacy is important to us. The purpose of this document is to disclose to you how your personal information may be used.

In order to establish your identity and reduce the risk of identity theft, we will need the following information: Legal name, date of birth, contact information, gender. We are committed to the accuracy of your information and will attempt to update this information from time to time.

Canada Revenue Agency (CRA) requires us to collect your social insurance number (SIN) when opening up a registered savings plan or any product that earns interest.

Personal financial information/health information is often collected in order for Niverville Credit Union to determine if you are eligible for financing or insurance eligibility.

We are required to exchange personal information when required by law, such as a search warrant or valid legal demand. We will only disclose the specific information asked for.

Niverville Credit Union does not sell or trade your personal information with any third parties and only uses it for its intended purpose. To keep you up to date on our products and services, we sometimes send out promotional offers. Please fill out and sign our "opt out" form should you wish not to receive future promotional mailings.

We ask for your e-mail address so we can communicate with you electronically. We respect your privacy and will provide you with an opt-out option of this service.



MEMBER PRIVACY POLICY

NIVERVILLE CREDIT UNION LIMITED is committed to protecting and securing the personal information entrusted to us by our members. We take great care in managing your personal information. Our priority is to comply with all the relevant privacy laws that apply to our business, and to strive for privacy best practices in all aspects of our product and service offerings. This privacy policy stands as a reflection of our commitment to privacy.

1. Accountability

NIVERVILLE CREDIT UNION LIMITED is responsible for personal information under its control. Toward that end, it has established internal procedures to comply with this policy and has designated a Privacy Officer and Deputy Privacy Officer to oversee compliance with the principles of privacy.

Ultimate responsibility for ensuring compliance with the provisions inherent in this policy rests with the Board of Directors of NIVERVILLE CREDIT UNION LIMITED. The Board delegates oversight of the day-to-day management of privacy to the NIVERVILLE CREDIT UNION LIMITED Privacy Officer. The Privacy Officer takes steps to ensure that: sound policies and procedures are in place and reviewed annually; staff are trained on their privacy responsibilities; and third parties adequately safeguard any personal information shared with them.

2. Identifying Purposes for Collection of Personal Information

NIVERVILLE CREDIT UNION LIMITED identifies the purposes for which personal information is collected at or before the time the information is collected. If your personal information will be used for additional purposes not previously identified and not permitted or required by law, you will first be informed of such purposes and asked for your consent to such uses.

Our primary purpose for collecting personal information is to deliver appropriate products and services to our members. Detailed examples of the purposes for which NIVERVILLE CREDIT UNION LIMITED collects personal information are outlined in the NIVERVILLE CREDIT UNION LIMITED Privacy Code.

3. Obtaining Consent for Collection, Use or Disclosure of Personal Information

Your knowledge and consent is required for the collection, use or disclosure of personal information, unless a legal exception to consent exists. In determining the appropriate form of consent, NIVERVILLE CREDIT UNION LIMITED shall take into account the sensitivity of the personal information and the reasonable expectations of its members. Visit the NIVERVILLE CREDIT UNION LIMITED Privacy Code for more details.

You may withdraw consent at any time, subject to legal or contractual restrictions and your reasonable notice. NIVERVILLE CREDIT UNION LIMITED will inform you of the implications of withdrawing

4. Limiting Collection of Personal Information

NIVERVILLE CREDIT UNION LIMITED limits the collection of your personal information to that which is necessary for purposes identified by NIVERVILLE CREDIT UNION LIMITED. NIVERVILLE CREDIT UNION LIMITED collects your personal information directly from you and may also collect your personal information from other sources, with your consent or where permitted or required by law, including but not limited to employers, personal references or credit agencies.

5. Limiting Use, Disclosure and Retention of Personal Information

NIVERVILLE CREDIT UNION LIMITED does not use or disclose your personal information for purposes other than those for which it is collected, except with your consent or as required by law. For example, NIVERVILLE CREDIT UNION LIMITED may disclose limited personal information to select organizations such as the Credit Union Office for Crime Prevention and Investigation, or a government agency that has made a legitimate demand or request for information.

NIVERVILLE CREDIT UNION LIMITED retains personal information only as long as it is deemed necessary, as set out in NIVERVILLE CREDIT UNION LIMITED's record retention policies, to fulfil the identified purposes for which the information was collected.

Personal information no longer necessary or relevant for the identified purposes, or no longer required to be retained by law, is securely destroyed, erased or made anonymous. NIVERVILLE CREDIT UNION LIMITED maintains reasonable and systematic controls, schedules and practices for such information, its retention and destruction.

6. Accuracy of Personal Information

NIVERVILLE CREDIT UNION LIMITED makes reasonable efforts to keep your personal information as accurate, complete and up-to-date as is necessary to fulfil the purposes for which the information is to be used. However, NIVERVILLE CREDIT UNION LIMITED relies upon its members to ensure accuracy of the personal information provided to NIVERVILLE CREDIT UNION LIMITED.

7. Security Safeguards

NIVERVILLE CREDIT UNION LIMITED protects personal information with security safeguards appropriate to the sensitivity of the information. With the use of appropriate physical, organizational and technical security measures, NIVERVILLE CREDIT UNION LIMITED protects personal information against a variety of risks, such as, loss, theft, unauthorized access, disclosure, copying, use, modification or destruction of such information. NIVERVILLE CREDIT UNION LIMITED's security safeguards are set out in employee procedures, IT security policies and other relevant internal documents. The safeguards in place are reviewed regularly to ensure that the risks introduced by new security threats are minimized.

8. Openness Concerning Policies and Practices

NIVERVILLE CREDIT UNION LIMITED makes readily available specific information about its privacy policies and practices to its members and the public upon request. This information includes: the name, title and address of the Privacy Officer to whom inquiries or complaints can be forwarded; the means of gaining access to personal information held by NIVERVILLE CREDIT UNION LIMITED; a description of the type of personal information held by NIVERVILLE CREDIT UNION LIMITED, including a general account of its uses; a copy of any brochures or other information that explains NIVERVILLE CREDIT UNION LIMITED's policies or information handling practices; and the types of personal information made available to related organizations such as subsidiaries or other suppliers of services.

9. Member Access to Personal Information

If you make a request for access to your personal information, NIVERVILLE CREDIT UNION LIMITED will inform you of the existence, use and disclosure of such information, and provide you with access to that information. You will be given the opportunity to challenge the accuracy and completeness of your information and have it amended as appropriate.

In order to safeguard personal information, you will be required to provide sufficient identification information in order for NIVERVILLE CREDIT UNION LIMITED to authorize access to your file. NIVERVILLE CREDIT UNION LIMITED shall promptly correct or complete any personal information found to be inaccurate or incomplete. Any unresolved differences as to accuracy or completeness shall be noted in the individual's file.

Where appropriate, NIVERVILLE CREDIT UNION LIMITED shall transmit to third parties having access to the personal information in question, any amended information or information regarding the existence of any unresolved differences.

Members can seek access to their individual files by contacting their account manager at NIVERVILLE CREDIT UNION LIMITED or by contacting the Privacy Officer as described below.

10. Challenging Compliance

If you are concerned that NIVERVILLE CREDIT UNION LIMITED is not complying with the principles set out in this policy, please contact NIVERVILLE CREDIT UNION LIMITED's Privacy Officer. NIVERVILLE CREDIT UNION LIMITED maintains procedures for addressing and responding to all inquiries and complaints by members with regards to NIVERVILLE CREDIT UNION LIMITED's handling of personal information.

For more information, please contact:

Privacy Officer – Sandy Charette, Manager Deposit Services

NIVERVILLE CREDIT UNION LIMITED

Box 430 Niverville, MB R0A 1E0

Fax: 204-388-9970

info@nivervillecu.mb.ca



NIVERVILLE CREDIT UNION LIMITED WEB SITE PRIVACY STATEMENT

NIVERVILLE CREDIT UNION LIMITED is committed to protecting the personal information of credit union members, employees and other individuals.

This privacy statement describes our privacy and security practices with respect to our Web site, which is hosted and operated in Canada. We encourage you to read this statement before using our Web site. By using the site, you agree to the terms and conditions of this statement.

Information we collect on our Web site

On our Web site, we only collect personal information required to improve the services we offer, to improve our site content and, with your permission, to contact you with information about our services. We will not share any personal information obtained on this Web site with any other organization without your express knowledge and consent.

You can visit all public areas of our site without providing any personal information about yourself. Our Web site collects only non-personal information based on a visitor's Internet Protocol (IP) address (this is not personally identifiable). Information collected includes the date and time of visit, the pages you visited, the type of Internet browser used to access the site, and the referring address (www.nivervillecu.mb.ca). This data is used to create statistics on site usage, diagnose problems with our Web site and improve on-line services.

Will a cookie be set on my computer when I visit this site?

To help us manage our Web site, we set a cookie on your computer that expires when you close your Web browser. This session cookie also helps facilitate ongoing access to and use of our Web site.

There are simple procedures in most browsers that allow you to automatically decline cookies, or to be given the choice of declining or accepting the transfer of particular cookies to your computer. You should note, however, that declining cookies may make it difficult to use portions of this Web site.

Links to other Web sites

Our Web site contains links to other Web sites (third party sites) that may be useful to our visitors, or who are affiliated with, or have a business relationship with NIVERVILLE CREDIT UNION LIMITED. When you leave our site to visit one these other sites, the only information transferred to the new site is the fact that you came from the NIVERVILLE CREDIT UNION LIMITED's Web site (www.nivervillecu.mb.ca) Transmission of this referring address allows the third party site to monitor their own Web traffic, but does not disclose any personal information about you.

Please note that any third party sites linked to and from our Web site are not under NIVERVILLE CREDIT UNION LIMITED's control and we are not responsible for the privacy practices or the content of any such linked site. We provide such links only as a convenience, and the inclusion of a link on our Web site does not imply endorsement of the linked site by NIVERVILLE CREDIT UNION LIMITED.

Contacting NIVERVILLE CREDIT UNION LIMITED with questions or concerns

If you send us an e-mail, any information provided by you will only be used for the purposes of responding to your inquiry or acting on your request. We will not use your name or e-mail address for any other purposes without additional consent.



NIVERVILLE CREDIT UNION LIMITED CASL STATEMENT

Niverville Credit Union has a no tolerance CASL Compliance Policy to protect our members and other individuals who receive our promotional messages. Niverville Credit Union takes compliance with all aspects of Canada's CASL Compliance Law (CASL) very seriously.

A commercial electronic message is any electronic message that encourages participation in a commercial activity, regardless of whether there is an expectation of a profit.

Niverville Credit Union will only send commercial electronic messages (CEMs) from our servers or install computer programs in compliance with this CASL Compliance Policy.

Generally, the sender of a CEM needs to obtain express or implied consent from the recipient before sending the message, unless a CASL consent exemption applies to the message. If CASL applies to the message, the CEM must include information that identifies the sender, provides the sender's contact information and enables the recipient to withdraw consent.

Niverville Credit Union never alters the transmission data of an electronic message. Credit unions that wish to install computer programs, including a mobile application, require express consent from the owner of the computing device, unless the computer program is self-installed. The request for consent must include contact information of the person seeking consent, a description of the program's functions and information on how consent can be withdrawn.

Commercial Electronic Messages:

Niverville Credit Union will only send CEMs in the following contexts:

- When the member or individual has explicitly provided their consent to receive such messages;
- When the message is in response to a request for information or an inquiry and is sent within 6 months of receiving the request or inquiry;
- When the message communicates factual information regarding a member's account, loan or similar relationship with Niverville Credit Union;
- When the message delivers a product or service, including updates, that the recipient is entitled to receive;
- When the message facilitates, completes or confirms an agreed upon transaction;
- When the receiver of the message has voluntarily disclosed their email contact or conspicuously published their email contact without indicating that they do not want to receive CEMs;
- When communicating with a referral;
- To satisfy or enforce a legal obligation or right; or,
- When consent to receive the message can be implied through an existing business relationship.

When a message recipient unsubscribes from receiving further CEMs from Niverville Credit Union, such a request will be processed as soon as possible, and no later than 10 business days after consent has been withdrawn.

Alteration of Transmission Data:

CEMs sent, or caused to be sent, from Niverville Credit Union's servers do not:

- Use or contain invalid or forged headers or non-existent domain names;
- Employ any technique to otherwise misrepresent or obscure the sender of an electronic message, or the point of origin of the transmission path for the message; or
- Cause delivery of a message to a destination other than, or in addition to, that specified by the sender due to the alteration of transmission data.

Installation of Computer Programs:

A computer program installed by Niverville Credit Union on anyone's computer system shall not perform any of the following functions that are contrary to the reasonable expectations of the owner or an authorized user of the computer system, without clearly and prominently identifying such functions when seeking express consent:

- Collect personal information stored on the computer system;
- Interfere with the owner's or an authorized user's control of his or her computer system;
- Change or interfere with settings, preferences or commands already installed or stored on another person's computer system;
- Change or interfere with data that is stored on the computer system in a manner that obstructs, interrupts or interferes with lawful access to or use of that data by the owner or an authorized user of the computer system;
- Cause the computer system to communicate with another computer system, or other device; or
- Install a computer program that may be activated by a third party without the knowledge of the owner or an authorized user of the computer program.



NIVERVILLE CREDIT UNION LIMITED VULNERABLE PERSONS STATEMENT

Financial abuse is the illegal or inappropriate use of another person's money or property and can be defined as an act or series of acts occurring between people, where the results are detrimental to the finances of one of them. Financial abuse occurs when someone tries to take or control what belongs to another person for their own benefit, at the expense of the other. Control can include money or property. The relationship between the people is usually one of implied trust (between family members, for example), but financial abuse can also occur in a professional relationship (such as between a health care worker and patient) or between strangers.

Financial abuses include:

- (1) Forgery, misuse or theft of money or possessions (often through unusual transactions, made in unusual locations, or large loans or major purchases that are inconsistent with the member's stage of life, habits or wishes);
- (2) Improper use of guardianship or Power of Attorney (POA), or opening a joint account as a readily accessible means by which to perpetrate abuse against a vulnerable person; and
- (3) Use of coercion, deception or undue influence to surrender finances or property (abuse by strangers typically involves scams).

Any of these three types of abuses takes advantage of a person. The result could be that the member does not have enough money to meet basic needs such as paying for prescriptions, groceries or other necessities. Another consequence is that the older adult's assets are being "distributed" prematurely and not in accordance to what their will would indicate.

Niverville Credit Union commits to:

- Act in accordance with all relevant legislation (federal, provincial, municipal) related to minimizing or preventing fraud or financial abuse of our members.
- Provide resources, including training staff to identify and respond to financial abuse. Ensure training addresses the complexity of adult financial abuse situations and emphasizes that each case will be different.
- Provide tools and resources to enable CU/CP staff to escalate concerns about suspected abuse, to document occurrences and to guide actions.
- Provide information to staff about community resources available for consultation and referral.
- Ensure information is provided to older clients to ensure informed decisions about financial matters.
- Provide resources to work with community groups to educate members about financial abuse as a step toward prevention (i.e. types of abuse; signs, prevention tips, what to do, where to get help).

We welcome any questions or concerns about our Web Site Privacy Statement, or the practices of this site. Please contact us by e-mail or in writing at the following address: Niverville Credit Union Attn: Privacy Officer – Sandy Charette, Mgr Deposit Services. [Box 430 Niverville MB R0A 1E0] [204-388-4747] [info@nivervillecu.mb.ca]

NIVERVILLE CREDIT UNION LIMITED reserves the right to amend its Web Site Privacy Statement and its Privacy Policy at any time with or without notice. Please check this page periodically for changes.

ACCESS TO PERSONAL INFORMATION AND PRIVACY CONCERN

OFFICE USE – Describe 2 pieces of signed ID provided for authentication (one must include a photo)

Date of Request: _____

Name of Requestor: _____

Requestor's Contact Information (in order for Niverville Credit Union to verify your request)

Phone Number: _____

E-mail Address: _____

I wish to access the following information

I wish to express a privacy concern

Details of your Request:

We encourage you to review the requested information at the offices of Niverville Credit Union, located at 62 Main Street, Niverville MB).

Please Provide my information at this credit union office address (an appointment will be confirmed).

Please send the requested information to the following address:

Please note the following:

- ❖ If we are able to provide you with access to your information:
 - We will attempt to do so within 30 days of your request. If we need longer to locate or gather your information, we will let you know.
 - There may be a charge associated with providing you access in order for us to recover costs incurred (for example, photocopying costs and staff time). You will be notified and asked to agree to such charges in advance of us incurring necessary costs.

- ❖ If we are unable to provide you with access to your information, we will provide you with a reason within 30 days of your request.

I certify that I am seeking access to my own personal information and have completed this form to the best of my ability. I understand that copies of records taken from the offices of Niverville Credit Union become the responsibility of the Requestor.

Signature of Requestor

Date

Name of Requestor (please print)

FOR INTERNAL USE ONLY

PRIVACY OFFICER:

DATE REQUEST WAS RECEIVED:

FOLLOW UP REQUIRED BY:

RESOLUTION:

Forward to: Privacy Officer, Niverville Credit Union, 62 Main Street – Box 430 Niverville, MB R0A 1E0 or Fax: 204.388.9970



Withdrawal of Consent FOR THE USE OR DISCLOSURE OF MY PERSONAL INFORMATION

MEMBER INFORMATION

PLEASE PRINT CLEARLY

NAME _____ 12- DIGIT ACCOUNT NUMBER _____

ADDRESS _____ CITY _____ POSTAL CODE _____

TELEPHONE _____ E-MAIL _____

I withdraw my consent for the use or disclosure of my personal information for the following purposes (Please select only those you wish to withdraw consent for):

- NCU promotions, with the exception of information included in account statements and communication required by law.
- Insurance promotions initiated by NCU affiliate Credit Union Member Insurance Services (CUMIS).
- Credit Union MasterCard promotions initiated by NCU.

I acknowledge that my personal information may continue to be used or disclosed for the purposes that have not been withdrawn, or where required for credit investigation/reporting, collection of overdue accounts, security reasons or by law.

I understand that by withdrawing my consent, Niverville Credit Union will not be able to offer certain promotions to me in the future.

I further acknowledge that a reasonable time period may be required to process my Withdrawal of Consent.

Please note that if one joint account holder withdraws consent, it may affect other Members associated with that account.

MEMBER SIGNATURE _____

DATE _____