

Laurentian Bank Financial Group Privacy Statement

1. Introduction

At Laurentian Bank Financial Group, we respect your privacy and are committed to protecting any personal information you entrust us with. For us, that is just part of doing business.

In this statement, Laurentian Bank Financial Group refers to the Laurentian Bank of Canada and its affiliates whose mission is to help customers improve their financial health by providing such products as deposit, credit, investment funds, loans, securities, trust, insurance, and other products and services. Laurentian Bank of Canada and its entities are collectively referred to as Laurentian Bank Financial Group (“LBCFG”).

Our privacy statement tells you how we protect your privacy and the confidentiality of your personal information and applies to all our dealings with you. It also explains how LBCFG collects and what LBCFG does to keep this information secure. We want you to know how we manage that information to serve you and that you have choices about how it is used and shared. It further explains how you can contact us if you have a question about or want to make a change to any personal information that LBCFG has collected about you. We strongly recommend that you take the time to read this Privacy Statement and retain it for future reference.

Your personal information is information that identifies you; such as your name and can include other information like your address, government issued identification numbers, financial account numbers, credit and payment history, income, age and gender.

2. Why We Ask for Your Personal information

When we collect personal information about you, we explain why we do so. The main reason why we ask for your personal information is to serve you as our client. We may also collect your personal information when you interact with us by visiting any of our branches or places of business, using our website or calling us.

For example, we may ask for your personal information for the following purposes:

- To establish, verify, and safeguard your identity;
- To service and improve the products and services you have with us;
- To assess your eligibility for some products and services such as credit cards, lines of credit, mortgages or other loan products;
- To communicate with you in relation with the products and services you have with us and other products and services that may be of interest to you;
- To give you financial advice and to provide investments that are suitable for you;
- To help us manage operations and risk within LBCFG (including compliance with legal and regulatory requirements or communications with our regulators);
- To detect and prevent fraud and unauthorized or illegal activities;
- To perform analytics; and
- To report on products that produce investment income.

3. Personal Information We Collect

We only collect the personal information we need for the purposes explained to you in Section 2 above. We may ask for your personal information when you begin a relationship with us and/or during the course of our relationship.

We collect most of your personal information directly from you, from publicly or commercially available sources or, with your consent, from third parties. For example, for credit products, we obtain credit reports to verify employment and income and to determine your credit worthiness.

Here are some examples of personal information we may collect:

- Name;
- Address;
- Birthdate;
- Signature;
- Personal identification number (PIN);
- Financial information such as personal financial and transaction records;
- Health information; and
- Employment information.

We may also ask for your social insurance number (SIN). We are required to request your SIN for reporting information to the Canada Revenue Agency. If we ask for your SIN for other purposes, you may choose not to provide it to us.

We may record telephone conversations with you to confirm our discussions and agreements and for quality control purposes. If you prefer not to have your calls recorded, you may transact business through an alternate channel where the service is available, such as through our branches, at the office location where you obtain our services or through online banking or automated banking machines.

You might also be subject to video surveillance for security purposes, when you visit our branches, office locations and automated banking machines.

4. Knowledge and Consent

We collect personal information about you only when you voluntarily provide it or authorize us to collect it from a third party. Typically, we will seek consent for the use or disclosure of your personal information at the time of collection. The form of consent depends on the sensitivity of the personal information and other circumstances.

Your express consent is obtained verbally, online or in writing. Depending on your use of a product or service or when you contact us to obtain our products or services may provide us with your implied consent.

We do not use your personal information without your consent unless:

- It is for the same purpose for which the information was originally collected or consistent with that purpose; or
- As authorized or permitted by law.

In certain circumstances, consent may be sought after the information has been collected but before use. For example, when we want to use or disclose the information for a purpose that we have not previously identified.

Subject to legal or contractual exceptions, you can refuse to provide or withdraw your consent at any time with reasonable notice. We note that in certain situations, refusing or withdrawing your consent may deny you access to certain products, services or to important information. We ask that you refer to the "Contact Us" section below on details on how to withdraw your consent and our staff will be pleased to explain your options and any consequences of withdrawing your consent.

5. Sharing Your Personal Information within LBCFG

We may share your personal information within LBCFG to manage our operations and business needs and risks as well as to comply with legal and regulatory requirements.

We may also share your personal information among LBCFG affiliates for marketing purposes, and to determine whether any products or services provided by different LBCFG affiliates are suitable for you. We may review the products that you currently have, how you use them, and assess your financial needs in order to offer you other LBCFG products and services that we believe will be of interest to you. Your consent to this use is optional and you can withdraw it at any time. Please refer to “Contact Us” below to withdraw your consent.

6. Releasing Your Personal information to Third Parties

We do not sell client lists or other client personal information to others.

We may release your personal information to third parties with your consent or as permitted or required by law in certain scenarios:

- **Service Providers:** We may share your personal information with our service providers to assist us in providing you with a service. This disclosure is limited to what is necessary to perform their services and the personal information cannot be used for other purposes. For example, cheque printers and bank card manufacturers require some client personal information to provide their services. We are committed to ensuring that these service providers have appropriate safeguards in place to protect your personal information. These service providers may be in Canada or other countries and may release your personal information in response to valid demands from governments, regulators, courts and law enforcement authorities of their countries;
- **Credit Products:** We may release your credit history, identifiable information and your repayment history to credit bureaus and other lenders on an ongoing basis to support the credit process. This permits the financial system to function efficiently and allows for the detection and prevention of fraud and allows us to continue to offer services to you;
- **Lawful Requests, Regulators and Self-Regulatory Organizations:** We may disclose your personal information if a law, regulation, search warrant, subpoena, court order or valid demand legally requires or authorizes us to do so. This may include requests from regulators and self-regulatory organizations that are responsible for overseeing LBCFG’s business such as the Office of the Privacy Commissioner of Canada, the Office of the Superintendent of Financial Institutions of Canada, the Investment Industry Regulatory Organization of Canada, the Autorité des marchés financiers and the Mutual Fund Dealers Association of Canada;
- **Investigation and Fraud:** Your personal information may be released in the case of a breach of an agreement or contravention of law to help prevent fraud, money laundering and other criminal activity;
- **Debt Collection:** We may also release your personal information to help us collect a debt from you; and
- **Transfers of Business:** We may buy businesses or sell parts of LBCFG from time to time and personal information regarding the accounts or services purchased or sold, including client personal information, is generally one of the assets to be transferred and released to all parties to a transaction.

7. Protecting Your Personal information

We protect your personal information with appropriate physical, procedural and technological safeguards

and security measures. Here are some ways in which we protect your information:

- Our employees are trained to adhere to specific policies and procedures to safeguard your personal information. Doing so is not only specified in our code of ethics, procedures and employment agreements but is also regularly re-confirmed in writing by our employees.
- We authorize our employees, agents and consultants to get information about you only when they need it to do their work for us;
- We require service providers to protect your personal information. In addition, they agree to use it only to provide the services we ask them to perform for us;
- We keep information under physical, electronic or procedural controls appropriate to the sensitivity of the information;
- We test & audit our safeguards and security measures regularly to ensure that they are properly administered and that they remain effective and appropriate for the sensitivity of the personal information.

8. Retention

We retain your personal information for as long as is necessary to fulfill the purpose(s) for which it was collected and to comply with applicable laws. The length of time we retain your personal information varies depending on the product or service and the nature of the personal information. The retention period may sometimes extend beyond the end of your relationship with us but only for so long as is necessary for us to have sufficient personal information to manage any issue that may arise later or to comply with any law, regulation or guideline issued by a governmental or self-regulating entity.

9. Ensuring Your Personal information is Accurate and Up-to-Date

We make every reasonable effort to keep your personal information accurate and up-to-date. Having accurate personal information enables us to comply with the law and give you the best possible service.

We have policies and procedures to maintain the accuracy of your personal information. We rely on you to help us maintain the accuracy of your personal information by notifying us of any changes to your information. (i.e. telephone numbers, address). If you do not inform us of changes to your personal information we may no longer be able to communicate with you or continue providing our services to you. If you find any errors in your personal information with us, please let us know and we will make the corrections.

10. Accessing Your Personal information

We give you access to your personal information.

If you are a client of LBCFG, most of your personal information is in your transaction records. These are available to you through your account statements, by visiting the branch or office where your account is held, or by accessing your account through online banking, telephone banking or automated banking machines.

If you require other personal information, please contact us as set out in "Contact Us" below with a written request. We may ask for reasonable fees depending on the information requested and will advise you of such fees prior to providing you with the information.

Please note that we may refuse to communicate some information contained in our records in accordance with applicable law and, in that case, will advise you in writing of our refusal. For instance, we cannot provide you with personal information in our records that contain references to other persons, LBCFG's proprietary information, information that relates to an investigation of a breach of an agreement and, a contravention of a law, or information that is subject to legal privilege or that cannot be disclosed for other legal reasons. You may file a complaint in accordance with the applicable complaint procedure if you are not satisfied with our decision as set out in "Addressing Your Concerns" below.

11. Contacting Us

For any questions or concerns regarding your personal information, including how to withdraw your consent or access your personal information, please contact us as set out below:

Entity	Inquiries/Contact numbers
Laurentian Bank of Canada Inc. 1360 René-Lévesque Blvd. W. Suite 600 Montreal, QC H3G 0E5	514.284.3987 1-.877.803.3731 customer_inquiries@laurentianbank.ca
LBC Trust, /Laurentian Trust of Canada Inc. 1360 René-Lévesque Blvd. W. Suite 600 Montreal, QC H3G 0E5	514.284.3987 1.877.803.3731 customer_inquiries@laurentianbank.ca
LBC Financial Services Inc. 1360 René-Lévesque Blvd. W. Suite 630 Montreal, QC H3G 0E9	514.252.1846 1.800.252.1846 Fax: 514.284.6982 lbcfs@laurentianbank.ca
B2B Bank / B2B Bank Financial Services Inc. / B2B Bank Intermediary Services Inc./ B2B Bank Securities Services Inc./ B2B Trust Co. 199 Bay Street, Suite 600, PO Box 279 STN Commerce Court, Toronto, Ontario, ON M5L 0A2	1.866.334.4434 Fax: 416 865-5930 unsubscribe@b2bbank.com
Laurentian Bank Securities Inc. and its divisions / Laurentian Bank Insurance Inc. Att: Privacy Officer René-Lévesque Blvd. W. Suite 620 Montreal, QC H3G 0E7	514.350.2868 or 1-888-223-0119 www.vmbi.ca/contactus privacy@lb-securities *LBI -Contact your Financial Security Advisor
LBC Capital Inc. Att: Privacy Officer LBC Capital Inc. 5035 South Service Road Burlington, Ontario L7R 4C8	Canadian.Privacy@LBCCapital.ca

12. Addressing Your Concerns

If you are not satisfied with how your request was handled or if you have any other concerns relating to privacy that you wish to escalate, please refer to the complaint process of the applicable LBCFG entity:

[Laurentian Bank of Canada Inc, LBC Trust Inc, Laurentian Trust of Canada Inc.](#)

[LBC Financial Services Inc.](#)

[B2B Bank Inc.](#)

[B2B Dealer Services Contact Us/Complaint Procedures](#)

[Laurentian Bank Securities Inc.\(and its divisions\)](#)

[Laurentian Bank Insurance Inc. \(Contact your Financial Security Advisor\)](#)

13. Online Privacy

This section supplements our privacy statement and applies to the collection, use and disclosure of personal information through all LBCFG Canadian websites including:

www.laurentianbank.ca

www.b2bbank.com

www.vmbi.ca

www.lbccapital.ca

www.lbcfg.ca

13.1 Personal Information Collected Online

When you browse our websites or access our online services, we may collect your personal information, such as:

- Online usage information such as pages you visited downloaded content and the address of the websites that you visited immediately before coming to our websites, which we collect through the use of cookies. For more information, please refer to “Use of Cookies” below;
- Device information such as IP addresses;
- Login ID and password to access our online services;
- Setting preferences;
- Information you provide to us originating from inquiries or online application forms; and
- Financial and transactional information when you use our online services.

13.2 Why We Collect and Use Personal Information Online

We collect and use your personal information online mainly to serve you as our client but also to prevent fraud and ensure security, to personalize your online experience, and for other purposes as set out in “Why We Ask for Your Personal information” above.

13.3 Safeguarding Your Personal Information Online

We use encryption techniques to protect the confidentiality of your personal information online, which are among the safest encoding methods available on the market. We encode exchanges to prevent intruders from accessing personal information entered during a session or information we transmit through our exchanges. Bank encryption methods are recognized data codification processes that ensure the safety of information transmitted. To access our online services, you must use an Internet navigator equipped with compatible encryption.

13.4 Consent

By using our websites and/or our online services you consent to the collection, use and disclosure of your personal information as provided in this statement and, where applicable, in other terms and conditions of our products or services. This statement may change from time to time and your continued use of the websites and/or our online services will mean that you consent to any modification regarding the collection, use and disclosure of your personal information.

13.5 Sharing

We may share your personal information collected online in accordance with the section regarding “Releasing Your Personal information to Third Parties” above.

13.6 Cookies

When you visit or interact with our sites, we or our authorized service providers may use cookies, and other similar technologies for storing information to help provide you with a better, faster, and safer experience and for advertising purposes.

A "cookie" is a small piece of data placed on your computer by a web browser (e.g. Chrome, Safari or Firefox) when visiting certain websites.

What do cookies do?

Our cookies and similar technologies have distinct functions. They are either necessary for the functioning of our services, help us improve our performance, or help us to serve you relevant and targeted content.

Two types of cookies

- 1. Session Cookies:** These cookies are stored in your devices temporary memory and will automatically disappear after you close the browser. These cookies enable you to move back and forth when you are logged into our secure online banking system. When you close your browser, the cookies expire and are no longer active or used.
- 2. Persistent cookies:** Another type of cookie is a persistent cookie. These cookies are kept on your online device usually for 30 to 90 days, and may be kept longer. They are used to monitor your activity on LBCFG's related websites.

Our use of cookies

Operationally required: We may use cookies, or other similar technologies that are necessary to the operation of our sites. This includes technologies that allow you access to our sites; that are required to identify irregular site behavior, prevent fraudulent activity and improve security; or that allow you to make use of our functions such as account onboarding, saved search, or similar functions;

Performance Related: We may use cookies, or other similar technologies to assess the performance of our websites, including as part of our analytic practices to help us understand how our visitors use our websites, determine if you have interacted with our messaging, determine whether you have viewed an item or link, or to improve our website content, services, or tools;

Functionality Related: We may use cookies, or other similar technologies that allow us to offer you enhanced functionality when accessing or using our sites. This may include identifying you when you sign into our sites or keeping track of your specified preferences, interests, or past items viewed so that we may enhance the presentation of content on our sites;

Use of these technologies by authorized third-party service providers: We may work with third-party companies¹, commonly known as service providers, who are authorized to place third-party cookies, or similar technologies for preventing fraud, improving security and storing information on our sites and tools with our permission.

These service providers may use these technologies to help us deliver our own content and advertising, and compile anonymous site metrics and analytics.

With the exception of the use of such technologies by our service providers or other authorized third-parties, we do not permit any third-party content on sites to include or utilize any cookies,

¹ At the time of publication of this statement, our main service providers were Google, Facebook and LinkedIn. Some may have been replaced or added since then or could be added or replaced in the future. We may use third parties, such as advertising networks and exchanges.

local storage, or similar technologies for tracking purposes or to collect your personal information.

Ad networks and exchanges operated by authorized third parties for interest-based advertising: We may use third parties, such as advertising networks and exchanges, to allow us to serve you advertisements. These third-party ad networks and exchange providers may use third-party cookies, or similar technologies to collect information about your visit to our site and elsewhere on the Internet. They may also collect your device identifier, IP address, or identifier for advertising (IDFA). The information that these third parties collect may be used to provide you with more relevant advertising on our sites or elsewhere on the web.

Your choices: If you do not agree with LBCFG's use of cookies, please discontinue the use of our website or change your browser settings.

LBCFG offers certain site features that are available only through the use of these technologies. You are always free to block, delete, or disable these technologies if your browser so permits, however doing so may affect critical functionality of the website.

You can disable cookies or similar technologies through the settings on your browser. You can follow the instructions on your browser's help page or their website to disable and/or delete these files set by our site and other sites.

13.7 E-mail

We do not sell your e-mail addresses to anyone outside LBCFG.

When you e-mail us or when you ask us to e-mail you, we learn your e-mail address and any information you include in the e-mail.

We use your e-mail address to acknowledge your comments and reply to your questions, and we store your communication and our replies in case we correspond with you again.

We may use your e-mail address to send you information about offers for products and services that we believe may be of interest to you.

If you ask to be on an e-mail mailing list for us to provide you with information on a regular basis, or if we send you information about our offers for products and services by e-mail, you may ask us to remove you from the list at any time using the unsubscribe instructions provided in each e-mail.

Generally, e-mail is unencrypted. We recommend that you use caution when sending us e-mails and that you do not include confidential information such as account numbers.

Fraudsters send fake e-mails impersonating Canadian banks requesting that you verify personal and banking information. These e-mails often ask the recipient to click on a link in the e-mail that directs them to a pop-up window or counterfeit online banking log-in page to enter their bank's log-in ID and password. We will never send you e-mails asking for confidential information like passwords, social insurance number or account numbers. Please do not respond to any e-mails asking for information like this.