



PRIVACY CODE

Date Approved: December 2024

Version Replaced Date: November 2023

DIGITAL COMMERCE BANK - PRIVACY CODE

Digital Commerce Bank ("DCBank", "we" or "our") is a member of the Digital Commerce Group of Companies (the "DCGroup of Companies").

The DCGroup of Companies is comprised of DCBank and its affiliates in Canada that offer financial products and services. DCBank understands the importance of keeping your personal information confidential. We have developed a Privacy Code that explains the types of personal information we collect, how it is used, and the steps we take to ensure that it is handled appropriately.

1. OVERVIEW

1.1. This Privacy Code may be revised from time to time. If we intend to use or disclose personal information for purposes materially different than those described herein, we will make reasonable efforts to notify affected individuals, if necessary, including by revising this Privacy Code. If you are concerned about how your personal information is used, you should contact us as described below or checking at our website periodically at dcbank.ca/privacy-policy to obtain a current copy of this Privacy Code. We urge you to request and review this Privacy Code frequently to obtain the current version. Your continued provision of personal information or use of our services following any changes to this Privacy Code constitutes your acceptance of any such changes.

1.2. The Privacy Code applies to personal customers, including business customers carrying on business as sole proprietors. While the Privacy Code does not apply to information about business customers carrying on business as corporations, partnerships or in other forms of association, DCBank protects the confidentiality of such information in accordance with DCBank's policies and the law.

2. ACCOUNTABILITY

2.1. We are accountable for all personal information in our control. The term personal information refers to information that identifies you as an individual. Personal information includes information that you have provided to us or was collected by us from other sources. It may include details such as your name and address, age and gender, personal financial records, identification numbers including your Social Insurance Number, personal references, and employment records. Every one of our employees is responsible for respecting and protecting the personal information to which the employee has access.

2.2. In order to comply with this Privacy Code, we have designed a Chief Privacy Officer to oversee DCBank's privacy practices.

3. COLLECTING PERSONAL INFORMATION

3.1. DCBank will collect most of your personal information directly from you through applications for our products or services and any supporting documentation and information you provide. We also collect your personal information from sources you have identified in your product or service applications with DCBank, including references you have provided, credit bureaus and from third parties or sources that are available to the public.

- 3.2. The personal information we collect may include:
- (a) Contact Information
 - (i) Name, address, telephone number and email address.
 - (b) Identity
 - (i) Information for identity matching and credit check purposes, such as your Social Insurance Number, date of birth, occupation, and government-issued identification; this information is also collected to allow DCBank to meet legal and regulatory obligations as well as Canada Revenue Agency's reporting requirements.
 - (c) Financial
 - (i) Information used by DCBank to assess the eligibility for DCBank's products or service (which may include information about your current and historical account information, balances and indebtedness, or account transaction history).
 - (d) Transactional
 - (i) Payment-related information, such as banking information and how you use different products or services with DCBank (which may include purchase and payment history).
 - (e) Other
 - (i) Such other information that will be collected with your consent or as permitted or required by law.
- 3.3. DCBank may monitor or record telephone calls between you and our representatives to ensure accuracy and to enhance customer service. If you do not wish to have your call recorded, you have the option to conduct business online or by contacting us in writing.

4. **USE OF PERSONAL INFORMATION**

- 4.1. DCBank will limit the collection of personal information to what we determine we need for the purposes set out below.
- 4.2. DCBank may use your personal information for a variety of purposes, including:
- (a) to verify your identity;
 - (b) to evaluate your application, understand your financial position and to assess your eligibility for requested products and services from DCBank;
 - (c) to set up, administer, service and manage your products or services;
 - (d) to communicate with you by various methods regarding products and services that may be of interest to you, including products or services offered by third parties (as permitted by law and consistent with any marketing preferences that we offer and that you have registered with us);
 - (e) to protect you from error, fraud and any other unauthorized or illegal activities;
 - (f) to maintain business records for legal and regulatory compliance;
 - (g) to manage your relationship with DCBank, including measuring the quality of customer service;
 - (h) to analyze DCBank's business results, compile statistics and conduct market research to better manage DCBank's business and to develop new products and services;

- (i) to understand our customers and to develop and tailor our products and services;
- (j) to comply with tax, legal and regulatory obligations;
- (k) to respond to any questions you may have;
- (l) to evaluate and improve our websites and other electronic offerings; and
- (m) for any other purpose to which you consent or that is permitted under privacy legislation or any other applicable law.

5. DISCLOSURE OF PERSONAL INFORMATION

5.1. We will only use or disclose your personal information for the purpose(s) it was collected and as otherwise identified in this Privacy Code.

5.2. Under certain circumstances, DCBank may disclose your personal information to third parties, including the following:

(a) **Administration**

- (i) We may share your personal information with other members of the DCGroup of Companies that perform administrative and processing services on our behalf.

(b) **Business Processes**

- (i) DCBank may disclose your personal information to third parties for the protection of our assets (for example, collection of overdue accounts). We may also share your information with third parties as reasonably necessary in connection with audits or for the purposes of detecting and preventing fraud.

(c) **Legal and Regulatory**

- (i) DCBank may disclose your personal information as necessary to meet legal, regulatory, industry self-regulatory, insurance, audit and security requirements, including any requirements under Canadian and foreign law that are applicable to DCBank and our service providers.

(d) **Fraud Detection and Prevention**

- (i) DCBank may disclose your personal information to the DCGroup of Companies or other third parties in order, to detect instances of potential fraud, and prevent fraud from occurring.

(e) **Business Transactions**

- (i) DCBank may use personal information and disclose it to third parties connected with the evaluation or in the performance of an actual sale, financing, assignment, insuring or any disposals of all or part of DCBank or our business or assets.
- (ii) Personal information may also be transferred as part of a corporate reorganization or other change in corporate control of DCBank, or the DCGroup of Companies as a whole.

(f) **Service Providers**

- (i) DCBank may transfer personal information to outside agents or third-party service providers that perform services on our behalf, such as card production, statement preparation, mailing, customer service, marketing, collections, information technology and/or data hosting or processing services. Such outside agents or third-party service providers will be given only the personal information needed to perform those contracted services and we do not authorize such service providers to use or disclose personal information for their own marketing or other purposes.
- (ii) We have contracts in place holding these service providers to the same standards of confidentiality by which we are governed. In some cases, these other companies may be located outside of Canada (such as in the United States) and may be required to disclose information to courts, government authorities, regulators or law enforcement in accordance with applicable law in that country.

6. MARKETING

6.1. Unless you have opted out, DCBank may share your personal information within the DCGroup of Companies to enable our affiliates to offer you additional products and services. Unless you have opted out, in addition to the above uses and disclosures, we may use your personal information (such as your contact information, information relating to the transactions on your account and your payment and purchase details) from time to time in order to determine your suitability for and to occasionally offer you additional products or services of the DCGroup of Companies.

6.2. If you no longer want your personal information used or disclosed for these purposes, you may contact us at any time by mail or by phone at the address or telephone number provided in the "Complaints and Questions" section below.

7. OBTAINING CONSENT

7.1. By applying for a new DCBank product or service and providing us with personal information, we obtain your consent to our collection, use and disclosure of such personal information for the purposes identified or described in this Privacy Code.

7.2. Subject to legal or contractual restrictions and reasonable notice, you may withdraw your consent to our collection, use and disclosures of personal information at any time. Note that if you withdraw your consent to certain use of your personal information, we may no longer be able to provide you with the products and services you request.

7.3. Note that you may not be permitted to withdraw consent to certain necessary uses and disclosures (for example, where we are legally required to collect, use or disclose your personal information).

8. LIMITS ON USE, DISCLOSURE, AND RETENTION

8.1. We will only use or disclose personal information for the reasons it was collected and as otherwise identified in this Privacy Code. DCBank will only keep your personal information for as long as reasonably necessary to fulfill its intended purpose or to satisfy legal requirements.

8.2. We do not sell the names or other personal information of our customers.

9. ACCURACY

9.1. We will keep personal information as accurate, complete and up-to-date as necessary for the identified purposes. You must play an active role in helping us do this by providing prompt notification of any changes to your personal information, such as your address or telephone number. If you find any error in our information about you, please notify us so that we can make the necessary changes. Failure to notify us of changes to your personal information may negatively impact the way we communicate or provide services to you. Where appropriate, we will advise others of any material amendments to your personal information that we may have released to them. If we do not agree to make the changes you request, you may challenge our decision as described in the "Complaints and Questions" section below.

10. SAFEGUARDING PERSONAL INFORMATION

10.1. We will protect personal information with safeguards and security measures appropriate to the sensitivity of the personal information. We use physical, electronic and procedural security measures to protect against the unauthorized use, access, modification, destruction, disclosure, loss or theft of your personal information. Only those authorized DCBank employees who require access to your personal information will have access to your personal information and they are aware of the importance of keeping it confidential.

10.2. We carefully select service providers who may have access to your personal information and require that any information we provide to them must be safeguarded and used only for the purpose of providing the service we have requested the company to perform.

11. ACCESS

11.1. When requested in writing, we will tell you what personal information of yours we have, what it is being used for and to whom it has been disclosed. When requested, we will give you access to your personal information. There may be a small charge for us providing this information to you; however, you will be notified of the approximate cost in advance.

11.2. In certain situations, we may not be able to give you access to all of your personal information. These situations include when it is prohibitively costly to provide the information, when access would reveal information about a third party (i.e. joint account), when access would reveal confidential commercial information, when access would threaten the life or security of another individual, when access would reveal information generated in the course of a formal dispute resolution process, or when access would reveal information gathered for purposes related to investigating a breach of an agreement or a contravention of the law. If we are unable to provide you with some of the personal information, we will tell you why.

11.3. If you would like to review or verify your personal information, you may contact us at:

Digital Commerce Bank
Attn: Chief Privacy Officer
736 Meridian Road NE
Calgary, Alberta T2A 2N7
1.844.836.6040

12. COMPLAINTS AND QUESTIONS

12.1. If you have any questions about our Privacy Code, you may contact DCBank's Privacy Officer at:

Digital Commerce Bank
Attn: Chief Privacy Officer
736 Meridian Road NE
Calgary, Alberta T2A 2N7
1.844.836.6040

12.2. If you are not satisfied with how your question or complaint has been handled, you may follow DCBank's dispute resolution process by visiting <https://www.dcbank.ca/legal/resolving-complaints> and review the "Resolving Your Complaint" information.

12.3. Finally, if DCBank was unable to adequately address your complaint, concern or question, you may also contact The Office of the Privacy Commissioner of Canada at:

Office of the Privacy Commissioner of Canada
30, Victoria Street
Gatineau, Quebec K1A 1H3
1-800-282-1376