



KHALSA CREDIT UNION

ਖਾਲਸਾ ਕਰੈਡਿਟ ਯੂਨੀਅਨ



Privacy Policy

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PURPOSE

At Khalsa Credit Union (KCU), we are committed to protecting privacy and safeguarding personal and financial information. Below is our policy outlining our commitment to protect privacy. This policy applies to all KCU employees, Board of Directors, Information Technology department, and our members.

COMMITMENT

Khalsa Credit Union is committed to ensuring the confidentiality and privacy and protecting the personal information of all members and other individuals whose personal information is held or controlled by the credit union or its subsidiaries.

PRIVACY OFFICER

KCU will designate a privacy officer and an alternate privacy officer to oversee the protection of personal information in compliance with the BC Financial Institutions Act, the BC Personal Information Protection Act (PIPA) and the credit union's privacy policies and practices.

CONDITIONS

KCU will not, as a condition of providing a product or service, require an individual to consent to the collection, use or disclosure of personal information beyond what is necessary to provide the product or service.

CONSENT

KCU will obtain consent for the collection, use and disclosure of personal information, except in circumstances permitted by the PIPA or other law.

EXPRESS CONSENT

KCU will obtain express written consent to the collection, use and disclosure of personal information, except in circumstances when the PIPA authorizes the collection, use or disclosure without consent or deems the collection, use or disclosure to be consented to.

IMPLICIT CONSENT

Implied consent may be relied on when the purpose would be considered obvious to a reasonable person and the individual voluntarily provides the personal information for that purpose.

DEEMED CONSENT

KCU may obtain consent to collect, use or disclose personal information for specified purposes, if the credit union sends notice to the individual that it intends to collect, use or disclose personal information for those specified purposes and gives the individual a reasonable opportunity to decline to have the personal information collected, used or disclosed for those purposes, the individual does not decline the collection, use or disclosure for those purposes and the collection, use or disclosure is reasonable having regard to the sensitivity of the personal information in the circumstance.

EXCEPTIONS TO OBTAINING CONSENT

There are certain times when KCU does not need consent or when KCU is legally prevented from asking member's consent to collect, use or disclose your Information. Here are some examples:

- when we are collecting or paying a debt
- when we are obtaining legal advice
- when obtaining your consent would interfere with an investigation or legal proceeding
- when we are obeying a court order or similar demand, or
- when there is a medical emergency.

WITHDRAWAL

An individual may withdraw consent at any time, subject to legal or contractual restrictions, provided that reasonable notice of withdrawal of consent is given to the credit union. On receipt of notice of withdrawal of consent, KCU will inform the individual of the likely consequences of the withdrawal of consent, which may include the inability of KCU to provide certain products or services, if the information is necessary to provide the products and services. When collecting information, KCU will state the purpose of collection and provide on request the position or title and contact information for an officer who can answer the individual's questions about the collection.

COLLECTION

Most of the information KCU will collect about member will be received from member directly. For example, to provide the products and services, KCU generally will need members' name, address, date of birth, and occupation. KCU will also need to ask member for identification and contact information, such as phone number or email address.

When a member applies for credit, KCU may ask to provide Information about employment and finances. When a member conducts business with KCU, the credit union will keep track of members' transactions and activity.

KCU will limit the collection of information to information that is necessary to provide a product or service or that is necessary for the purpose consented to by the individual or to information otherwise permitted to be collected by the PIPA or other law.

KCU may collect Information from other persons or organizations, including the following:

- government agencies and public registries
- credit reporting agencies, other lenders and financial institutions
- service providers, agents and other organizations with whom you or we conduct business, or
- persons authorized to act on your behalf under a power of attorney or other legal authority.

USE

KCU will not use personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or authorized by law.

KCU will collect and use Information to manage relationship and to consistently deliver high quality products and services. This includes collecting and using the Information for the following purposes:

- to determine members' eligibility for products and services
- to process members' accounts, transactions and statements
- to provide products and services at the time of request and on an ongoing basis
- to provide members with information and materials related to membership
- to inform members about new business initiatives including contacting member to obtain views and to encourage member to express views about them
- to manage and assess KCU operations and risks
- to improve and develop products and services
- to conduct research and generate statistics related to KCU's business, products, services and membership
- to comply with applicable laws and the requirements of regulators
- to investigate and protect members and KCU from error, risk, fraud and criminal activity
- to contact member for purposes related to member's account, membership and other services, and
- to offer members products and services that may benefit members.
- to fulfill the job-related responsibilities.

DISCLOSURE

KCU will not disclose personal information for purposes other than those for which it was collected, except with consent of the individual, account holder or other individual or as required or authorized by law.

There are times when KCU may disclose member's Information to other persons or organizations, but under no circumstances KCU will sell or give customer lists to other companies. Here are some examples of when, in the credit union's discretion, KCU may disclose Information:

- at member's request
- with member's consent
- to a person sharing a joint membership in relation to the membership
- to credit reporting agencies and other lenders
- to collect a debt owing to KCU
- when required or permitted by law
- in relation to an investigation or legal proceeding to investigate and protect the concerned member, other members, and KCU from error, risk, fraud and criminal activity, or
- in connection with a transaction to sell parts of KCU's business, insure, sell or securitize assets.

SHARING

KCU may share personal information with other carefully selected organizations with the consent of the individual or as required or authorized by law, in accordance with the PIPA or other law.

KCU work with third parties who help with business or with providing members products and services. Members additional consent will not be obtained, unless when KCU is required to disclose members' Information to our service providers, KCU will only give them what is necessary and will take steps to ensure that the Information will be handled carefully.

Information may be stored and processed outside of Canada or provided to suppliers and other third parties that perform their activities in other jurisdictions. Accordingly, members' Information may be subject to valid information requests made by the government agencies in these jurisdictions.

ACCESS

Member and account holder information, such as copies of statements, transaction slips and account agreements, will be provided upon request. KCU may charge a fee for doing so. For other information, upon written request, KCU will provide the individual with the personal information under the control of the credit union, information about the ways in which the personal information requested has been and is being used and the names of individuals and organizations to whom the personal information requested has been disclosed. KCU may charge a minimal fee for providing information. KCU will provide an estimate of the fee upon receiving the access to information request. KCU may require a deposit for all or part of the fee. KCU may not provide information that it is not required to disclose and will not share the information that is not required by law, such as information that would reveal the identity of another individual without his or her consent.

ASSISTANCE

KCU will assist individuals to complete an access to information request to ensure that the information wanted or needed is provided accurately, completely and promptly. An applicant may be required to provide sufficient information to permit the credit union to provide an account of the existence, use and disclosure of personal information it holds. The additional information provided will only be used for this purpose.

TIME LIMIT

KCU will endeavor to respond to an access to information request within 30 days. If additional time is required because sufficient detail has not been provided by the applicant, a large amount of material is requested or must be retrieved or more time is needed to consult with other organizations, KCU may apply to the BC Privacy Commissioner for an extension under the PIPA. KCU retention period of account documentation is 7 years.

REFUSALS

If KCU refuses access to personal information, the credit union's response to the access to information request will provide the reasons for refusal and provide the name, position/title, address and telephone number of an officer of the credit union who can answer the applicant's questions about the refusal. The credit union may refuse to confirm or deny the existence of personal information collected as part of an investigation.

ACCURACY

KCU will make a reasonable effort to ensure that personal information it is using or disclosing is accurate and complete. If an individual demonstrates the inaccuracy or incompleteness of personal information, the credit union will amend the information as required. If appropriate, KCU will send the amended information to third parties to whom the information has been disclosed. When a challenge regarding the accuracy of personal information is not resolved to the satisfaction of the individual, KCU will annotate the personal information under its control with a note that the correction was requested but not made.

PROTECTION

KCU will protect the personal information in its custody or control by making reasonable security arrangements to prevent unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks. KCU will take reasonable steps, through contractual or other reasonable means, to ensure that a comparable level of personal information protection is implemented by the suppliers and agents who assist in providing services to members, account holders and other individuals.

RETENTION

KCU will keep personal information used to make a decision that affects the individual for at least one year after using it to make the decision. KCU will, in accordance with its retention schedule, destroy, erase or make anonymous documents containing personal information, as soon as it is reasonable to assume that the original purpose is no longer being served by the retention of the information and retention is no longer necessary for legal or business purposes. KCU may retain personal information about individuals and account holders with their consent in order to assist in the provision of future products and services and for marketing purposes, such as sending information about products and services that may be of interest and may update the information as necessary to provide products and services applied for. KCU will take due care with the destruction of personal information for preventing unauthorized parties from gaining access to the information.

SAFEGUARDING

KCU will protect members' information against unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks using thorough and reasonable safeguards, training, and security measures.

REPORTING THE BREACH OF SECURITY SAFEGUARDS

KCU will notify the Office of the Privacy Commissioner of Canada (OPC) and affected individuals of "a breach of security safeguards" involving personal information under the organization's control where it is reasonable in the circumstances to believe that the breach creates a "real risk of significant harm" to affected individuals.

EMPLOYEES' TRAINING

It is mandatory for all KCU employees to complete the privacy course on an annual basis. Manager, Human Resources will be responsible for registering all KCU employees for this privacy course annually. KCU will incorporate a tracking system to ensure annual completion.

EMPLOYEES' RESPONSIBILITY

It is obligatory for all KCU employees to comply with KCU Privacy Policy. Non-compliance will lead to consequences up to and including termination.

QUESTIONS

Members and other individuals may direct any inquiries or complaints regarding their personal information to KCU's privacy officer. Contact information will be available by inquiring at any office or administration center of the credit union or alternatively please email to privacy@khalsacredit.com.

COMPLAINT PROCESS

KCU will, on request, strive to resolve complaints issues for members and other individuals as quickly as possible. KCU will ensure that inquiries, concerns and complaints regarding personal information receive prompt attention and are resolved in a timely manner. Where appropriate, members and other individuals will be informed of their right to file a complaint with the BC Privacy Commissioner and will be provided contact information.

POLICY REVIEW & APPROVAL

The Conduct Review Committee will review and approve this policy whenever necessary, but at minimum on an annual basis.