

Privacy Code

DirectCash Bank (the “Bank”, “we” or “our”) knows the importance of keeping your personal information confidential. We have developed a Privacy Code that explains the types of personal information we collected, how it is used, and the steps we take to ensure that it is handled appropriately.

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.

This Privacy Code is effective as of August 12, 2015.

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, the Bank protects the confidentiality of such information in accordance with the Bank’s policies and the law.

I. Accountability

We are accountable for all personal information in our control. The term personal information refers to information that identifies you as an individual. It includes not only such things as your age and gender, but also your personal financial records and identification numbers, such as your social insurance number.

In order to comply with this Privacy Code, we have designated our Chief Privacy Officer to oversee the Bank’s privacy practices.

II. Collecting Personal Information

The Bank 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 the Bank, including references you have provided, credit bureaus as well as from third parties or sources that are available to the public.

The personal information we collect may include:

- Contact Information
 - Name, address, telephone number and email address
- Identity
 - 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 the Bank to meet legal and regulatory obligations as well as Canada Revenue Agency's reporting requirements
- Financial
 - Information used by the Bank to assess the eligibility for the Bank's products or service (which may include information about your current and historical account information, balances and indebtedness, or account transaction history)
- Transactional
 - Payment-related information, such as banking information and how you use different products or services with the Bank (which may include purchase and payment history)
- Other
 - Such other information that will be collected with your consent or as permitted or required by law

The Bank may monitor or record telephone calls between you and our representatives to ensure accuracy and to enhance customer services. If you do not wish to have your call recorded, you have the option to conduct business online or by contacting us in writing.

III. Use of Personal Information

The Bank will limit the collection of personal information to what is needed, for the reasons set out below:

The Bank may use your personal information for a variety of purposes, including:

- to verify your identity
- to evaluate your application, understand your financial position and to assess your eligibility for requested products and services from the Bank
- to set up, administer, service and manage your products or services
- to communicate with you by various methods regarding products and services that may be of interest to you
- to protect you from error, fraud and any other unauthorized or illegal activities
- to maintain business records for legal and regulatory compliance
- to manage your relationship with the Bank, including measuring the quality of customer service
- to analyze the Bank's business results, compile statistics and conduct market research to better manage the Bank's business and to develop new products and services

- to comply with tax or legal and regulatory obligations
- to respond to any questions you may have
- for any other purpose to which you consent or that is permitted by privacy law or any other applicable law

IV. Disclosure of Personal Information

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

- a) Administration**
We may share your personal information with our affiliates who perform administrative and processing services on our behalf.
- b) Business Processes**
The Bank 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**
The Bank may disclose your personal information as necessary to meet legal, regulatory, industry self-regulatory bodies, insurance, audit and security requirements, including any requirements under Canadian and foreign law that are applicable to the Bank and our service providers.
- d) Business Transactions**
The Bank 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 the Bank or our business or assets. Personal information may also be transferred as part of a corporate reorganization or other change in corporate control of the Bank.
- e) Service Providers**
The Bank may transfer personal information to outside agents or third party service providers that perform services on our behalf, such services which may include 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 purposes. We have contracts in place holding these service providers to standards of confidentiality.

f) **Marketing**

Unless you have opted out, the Bank may share your personal information with affiliates of the Bank, with our partners that provide our customers with benefits and services and with service providers to enable them to offer you with additional products and services of the Bank and other organizations.

Unless you have opted-out, in addition to the above uses and disclosures, we may consult and use your personal information (such as your contact information, gender, 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 occasionally offer you additional products or services of the Bank and/or those of our affiliates and partners that may be relevant or of interest to you. We may also disclose the above types of information to our affiliates or partners for their use for similar purposes and to send you information about their products and services. 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.

V. Obtaining Consent

By applying for a new Bank product or service and providing us with personal information, we will assume that you consent to our collection, use and disclosure of such personal information for the purposes identified or described in this Privacy Code.

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 certain of our products and services. For example, you may choose not to consent to our use of your Social Insurance Number; however, in doing so, we may not be able to extend certain services to you.

Note also that where we have provided or are providing services to you, your consent will be valid for so long as necessary to fulfil the purposes described in this Privacy Code or otherwise described to you at the time of collection, and you may not be permitted to withdraw consent to certain necessary uses and disclosures (for example, but not limited to, maintaining reasonable business and transaction records, disclosures to Canadian and foreign government entities as required to comply with laws).

VI. Limits on Use, Disclosure, and Retention

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

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

VII. Accuracy

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, for example, to address or telephone numbers. If you find any error in our information about you, please notify us and we will undertake to make the necessary changes.

VIII. Safeguarding Personal Information

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, destruction, loss or theft of your personal information. Only those authorized Bank employees who require access to your personal information will have access to your personal information and they will have been made aware of the importance of keeping it confidential.

We carefully select service providers who may have access to your personal information and require them to be bound by the privacy and security standards that meet the Bank's requirements.

IX. Access

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.

In certain situations we may not be able to give you access to all of your personal information: for example, 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 explain the reasons for this lack of access when asked.

To request to review or verify your personal information, you may contact us at:

DC Bank
Bay 6, 1420 – 28th Street NE
Calgary, Alberta
T2A 7W6
1-888-466-4043

X. Complaints and Questions

If you have any questions about our Privacy Code, you may contact the Bank's Privacy Officer at:

DC Bank
Attn: DC Bank Chief Privacy Officer
Bay 6, 1420 – 28 Street NE
Calgary, Alberta
T2A 7W6
1-888-466-4043

If you are not satisfied with how your question or complaint has been handled, you may follow the Bank's dispute resolution process by visiting <http://dcbank.ca/legal> and review the "Resolving Your Complaint" information under "Reference Documentation".

Finally, if the Bank 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
Place de Ville
112 Kent Street, 3rd floor
Ottawa, Ontario
K1A 1H3
1-800-282-1376