

## **Protecting your privacy is important to TCCU**

TransCanada Credit Union Ltd. ("TCCU") has adopted this Privacy Statement to provide you with an overview of the collection, use, retention, and disclosure of personal information that you may provide while using the Credit Union's products and services (collectively referred to as "Services"). Credit Union encourages you to read this Privacy Statement, as well as any Terms and Conditions that may be applicable to a particular product and service, in order to understand how we collect and process personal information in the course of providing the Services and your interaction with the Services.

By using the Services, you consent to the collection, use, retention, and disclosure of your personal information for processing as described in, and subject to the limitations set out in, this Privacy Statement.

## **Personal Information**

Personal information is any information that would identify a person directly, or indirectly in combination with data from other sources. For example, personal information includes a full name, home or work address, phone number, national identification number (SSN, SIN, etc.), email address, banking details, IP address, biometric data, payment information, usage data, or any information that may individually identify a person.

TCCU may collect personal information including without limitation your name, phone number, email address, IP address, and device identifiers, in the course of its Services, and may use or disclose that personal information as described with this Privacy Statement.

TCCU may also create de-identified or anonymized data from personal information by excluding data components (such as your name, email address, etc.) that makes the data able to personally identify you, through obfuscation, or through other means. In addition, TCCU may collect and use aggregated, anonymous information to provide data about the Services to advertisers, potential business partners and other unaffiliated entities. As this information does not identify a person, and is therefore not personal information, TCCU's use of such aggregated, anonymized and/or de-identified data is not subject to this Privacy Statement.

## **Consent and Collection of Personal Information**

If you use TCCU's website, or conduct a transaction through TCCU's website where personal information is essential, your consent is implied to collect and use your personal information to facilitate that use or complete that transaction requested or initiated by you only. Examples of instances in which personal information may be collected by TCCU are, but are not limited to:

- When you request information or Services, and/or when requested information or Services are provided to you,
- When you access and navigate TCCU's website, or engage in communication and/or business transactions with TCCU,
- When TCCU is administering, planning, and managing its relationship with you or communicating with you in relation to this relationship,
- Where TCCU seeks to better understand how TCCU may improve its products and services, to develop and conduct its business and operations, and for other internal business purposes,
- Where TCCU seeks to provide you with information on current and future products and services or other developments with respect to TCCU and its affiliates and partners,
- Where TCCU needs to comply with applicable legal and regulatory requirements, or protect TCCU's legal rights and property, or
- If you knowingly submit Personal information through TCCU's website for the purpose of registering for a service, a contest, or authentication.

During these instances, TCCU may collect data such as, but not restricted to: name, email address, phone number, address, areas of the Services or TCCU websites you visit, transaction type(s) you engage in or request (and amounts thereof), content you view, your IP address, data downloaded or submitted by you, as well as the nature of the individuals or entities with whom you communicate or transact business using the Services.

If at any point you wish to withdraw consent to personal information collection, please contact the TCCU Privacy Officer noted in this Privacy Statement. Please note that certain Services may only be able to be offered or provided to you if you disclose the personal information necessary to facilitate those Services, and therefore TCCU may not be able to provide you with certain Services in the event that you choose not to disclose that personal information to TCCU.

### **Anonymous Information**

When you interact with a TCCU Service, similar to most other websites, apps, and online services, certain anonymous technical information about your visit is automatically logged and collected by TCCU. This may include information about the type of browser you use, operating system, the date and time you access the Service, the links you accessed while using the Service, and the internet address of the website, if any, which linked directly to the TCCU Service. This information is used for system administration purposes such as diagnosing problems with TCCU's Services, servers and websites, compiling aggregated and statistical information, and to improve the operation and content of TCCU's websites and Services. It is not personally identifiable, and is not considered personal information and subject to this Privacy Statement.

### **Personal Information Use**

TCCU may use collected personal information for such purposes as:

- Helping to establish and verify the identity of users, and to keep user accounts secure,
- Opening, maintaining, administering and servicing users' accounts or memberships,
- Providing Services and support to users,
- Improving TCCU's websites, including tailoring its websites to users' preferences,
- Providing users with product or Service updates, promotional notices and offers, and other information about TCCU,
- Corresponding with you, and responding to your questions, inquiries, comments, and instructions,
- Maintaining the security and integrity of TCCU systems, and,
- Complying with applicable laws.
- Once collected, TCCU will store and process your personal information in secure locations.

Personal information will only be retained by TCCU for the length of time required to fulfill the purpose or complete the transaction for which it was collected, or as may be required by law. Beyond that point, personal information in the possession or control of TCCU will be anonymized or securely destroyed.

### **Security**

TCCU maintains reasonable physical, technical, and administrative security measures to minimize the risk of unauthorized loss, theft, copying, misuse, access, disclosure, alteration, or destruction of your personal information.

TCCU also restricts access to your personal Information to only those persons who have a legitimate business need or legal requirement to view it in connection with the Services. You, as a personal information owner, may also authorize any persons you may choose to have access to your personal information.

Although TCCU does utilize security measures appropriate to the level of risk, no method of data transfer or storage on the internet is 100% secure and security risks cannot be eliminated entirely. As such, TCCU cannot guarantee perfect security, integrity, or confidentiality of personal information.

In the event of a data breach or security incident involving the Services, TCCU will take all reasonable steps to comply with the breach reporting obligations that may be applicable to it under Alberta privacy laws. TCCU may also seek to notify you in such event. If notification is appropriate or required, TCCU may notify you by email, messaging to your device, or other reasonable means.

### **Disclosure of Personal Information**

TCCU does not provide personal information to unaffiliated third parties for their use in marketing directly to you. We may use unaffiliated companies, or trusted third party service providers, to help maintain and operate our Services for reasons related to our business operations and to better serve you, and those companies may receive your personal information for that purpose. When TCCU shares personal information with third-party services that support our delivery of the Services, we require that they use your personal information only for the purposes we've authorized, and that they protect your personal information to at least the same standards used by TCCU.

TCCU may also disclose personal information about you in connection with legal requirements, such as in response to an authorized subpoena, governmental request or investigation, or as otherwise permitted by applicable law (including, without limitation, to prevent fraud or abuse, or to protect TCCU's legal rights, property, or the safety of TCCU, its employees, users or others).

Finally, as TCCU's business develops, it may sell or buy corporate assets, and in such transactions personal information may be one of the transferred business assets. If TCCU or substantially all of its shares or assets, is acquired or an acquisition is contemplated, personal information may be one of the assets assessed or transferred in connection with that transaction.

### **"Cookies" and Advertisers**

The TCCU websites, or the third-party companies used to host, operate, or maintain these websites, may place a "cookie" on your computer in order to allow you to use these websites and to personalize your experience.

A "cookie" is a small piece of data, or an alphanumeric identifier, that can be sent by a web server to your computer or device, which then may be stored by your browser on your computer or device. Cookies allow TCCU to recognize your computer or device while you are on our websites and help customize your online experience and make it more convenient for you. Cookies are also useful in allowing more efficient log-in for users, tracking transaction histories, and preserving information between browsing sessions. The information collected from cookies may also be used to improve website functionality.

The advertisers and/or other content providers that may appear on TCCU websites may also use cookies that are not sent by TCCU. Such ads or content may contain cookies that help track and target the interests of users of our websites to present "personalized" advertisements or other messages that the user might find interesting. TCCU is not responsible for any such cookies.

Most web browsers have features that can notify you when you receive a cookie or prevent cookies from being sent. If you disable cookies, however, you may not be able to use certain personalized functions of TCCU websites.

### **Rights with Respect to Personal Information**

TCCU is committed to ensuring you retain full access to and control of your personal information. To that end, we endeavor to respect your right to be informed regarding the collection, use and disclosure of personal information, and your right of correction and access to it, via this Privacy Statement.

If you would like to access, correct, remove, request a copy of, withdraw consent to collection of your personal information, or are looking for any additional information on how your personal information may

be collected, used or disclosed by TCCU, please contact the TCCU Privacy Officer via the Contact & Questions area at the bottom of this Privacy Statement. Subject to certain exceptions and limitations that may be prescribed by applicable law, you will be provided with reasonable access to your personal information, and will be entitled to have it amended or corrected as appropriate.

In certain circumstances, you may have the right to have your personal information, or certain components of your personal information, erased by TCCU, to have your personal information moved, copy or transmitted from TCCU's systems to other systems, or to object to or restrict certain processing of your personal information by TCCU. In the event that you wish to inquire about, or seek to exercise any of these rights (as they may be applicable), please contact TCCU's Privacy Officer.

### **External Links**

TCCU Services may contain links to other websites, apps, or services, including those of advertisers or third party content providers who offer downloads as part of a TCCU Service. TCCU is not responsible for the privacy practices or the content of other websites, apps, or services. We encourage you to read the Privacy Policies published by such third parties before divulging your personal information to them.

### **Changes to this Privacy Statement**

TCCU reserves the right to modify or supplement this Privacy Statement in its discretion, at any time. If a material change to the terms of this Privacy Statement is made, we will post a notice on our website and a link to the new or amended Privacy Statement. The collection, use and disclosure of your personal information by TCCU will be governed by the version of this Privacy Statement in effect at that time. Your continued use of TCCU's websites and/or Services subsequent to any changes to this Privacy Statement will indicate your consent to the collection, use and disclosure of your personal information in accordance with the amended Privacy Statement.

### **Contact and Questions**

If you have any questions or comments regarding this Privacy Statement or any aspects of TCCU Services, please contact TCCU's Privacy Officer at [credit\\_union@tcenergy.com](mailto:credit_union@tcenergy.com).

Access requests, correction requests, complaints, or inquiries can be mailed or emailed to:

Privacy Officer  
TransCanada Credit Union Ltd.  
450 1<sup>st</sup> Street SW  
PO Box 1000, Station M  
Calgary, Alberta, T2P5H1  
[credit\\_union@tcenergy.com](mailto:credit_union@tcenergy.com)

Any person who wishes to appeal and action or decision of TransCanada Credit Union Ltd. may contact:

Alberta Privacy Commissioner Office  
Suite 2460, 801 8th Avenue SW  
Calgary, Alberta, T2P 3W2  
[generalinfo@oipc.ab.ca](mailto:generalinfo@oipc.ab.ca)