



HSBC InvestDirect  
a division of HSBC Securities (Canada) Inc.

## Your privacy

At HSBC, we respect your privacy and are committed to keeping personal information about you strictly between us. For the security of all of our customers, we have adopted our own Privacy Code which lists the ten principles of privacy observed by HSBC Bank Canada and its subsidiaries in Canada<sup>†</sup>, and is available on our Website [hsbc.ca](http://hsbc.ca) or at your nearest HSBC branch. This Privacy Notice answers common questions about the ways in which we collect, use and share your personal information. It explains your privacy choices and how you can access and change the personal information, which we have about you. For complete information, please consult our Privacy Code.

## Your consent

*We will not collect, use or disclose your personal information without your consent, except where required or permitted by law.*

In order to provide you with products and services, it is necessary for us to be able to collect, use and disclose your personal information for certain clearly identified purposes. We obtain this consent during the application process. If you choose not to consent to these uses of your personal information, we will explain the consequences of this refusal to you. For example, if you refuse your consent to a credit check, we may not be able to offer you products for which credit worthiness is relevant. We must share your credit information with credit bureaus and other lenders in order to ensure the integrity of the credit approval process. As a result, you cannot withdraw your consent to this sharing of information, once you have a product with us for which credit worthiness is relevant.

## About cookies

HSBC Bank Canada and its subsidiaries have Websites which may use persistent cookies as a means of collecting non sensitive information on general website usage. These cookies are not designed to identify you personally and the information they gather is used only to guide improvements in navigation, enhance content and provide a means for us to ensure that our websites continue to meet site users' needs. These cookies are not used for any promotional purposes. If you would like to browse these websites you may do so without accepting cookies.

## Answering your questions about privacy

### ***What personal information do you need?***

"Personal Information" means any identifiable information about you. When you apply for a product or service with us, we are required by law to collect certain personal information from you including your name, address, signature, date of birth, identification numbers, and occupation or employment information. This information allows us to confirm your identity.

In addition, depending on the type of product or service you are applying for, we will collect other personal information about you including your income, assets, liabilities, source of funds, payment records, personal references, investment objectives, financial plans, credit reports and other financially-related information.

We use this information to evaluate your application for products and, in the case of mutual funds or brokerage or investment accounts, to ensure that our advice and the investments you make are suitable for you.

For income tax reporting purposes, the government requires us to keep a record of your social insurance number (“SIN”) if you have an account that earns interest or if you are buying registered investment products. With your consent, we will also collect, use and, in some cases, share your SIN in order to ensure accuracy on credit checks, meet legal and regulatory requirements, and for collections, internal audit (including security), statistical, and record keeping purposes. You can withdraw your consent to these additional uses of your SIN at any time, as described on the final page of this Privacy Notice.

### ***How is your personal information used?***

We use your personal information to:

- evaluate your application for products and services;
- open, operate and collect on your account(s);
- provide ongoing service to you as a customer;
- honour your privacy choices;
- maintain the accuracy and integrity of the credit reporting system;
- verify your identity;
- meet legal and regulatory requirements;
- conduct our internal audit (including security) functions – these functions allow us to monitor our systems and processes. This helps us protect you from fraud, identity theft and unauthorized access to your accounts;
- conduct statistical and record keeping operations.

With your consent, we will share your personal information within the HSBC Group†† so that HSBC can determine what products or services may be of interest to you and offer these products and services to you. With your consent, we will also offer you the products or services of selected third parties. You may at any time withhold, withdraw or change your consent to the uses of your personal information, which are set out under “Your Choices” on the last page of this Privacy Notice, and this will have no effect on our relationship with you.

### ***Where do you obtain personal information about me?***

Most of the information comes directly from you when you apply for financial products or services. We may also need information from credit bureaus, income sources and personal references you have provided to us. Of course, we obtain consent from you before we contact anyone for information about you.

### ***In what circumstances is personal information disclosed?***

Generally, we do not disclose your personal information without your consent. More specifically, we ask for your written consent for the disclosure of information to credit reporting agencies or to other credit grantors.

There are however, some exceptions. For example, we sometimes require services from suppliers and agents, such as cheque printers, market research and computer data-processing companies. We choose our service providers and agents with care and we impose strict contractual obligations on them to protect your personal information to the standards of confidentiality and security, which we observe. We use service providers or agents located in Canada or in other countries and, as a result, personal information may be accessed under the laws of Canada or such other countries to which the information has been transferred. Our customer lists are for HSBC use only and we never sell or give lists to other companies.

Another exception is when HSBC is required by law to disclose your personal information. For example, if HSBC receives subpoenas, search warrants, court or government orders HSBC releases the information but only to the extent that is legally required. In addition, the law permits us to disclose personal information: in order to collect a debt owed to us; and to government authorities or investigative bodies for various law enforcement purposes like combating fraud or money laundering.

With the ongoing growth of the HSBC Group, some of our businesses may be bought or sold. In this event, personal information would be transferred in order that the purchaser could continue to provide ongoing service to the affected customers.

A full listing of exceptions can be found in our Privacy Code.

***How long do you keep personal information?***

We only keep your personal information on file for as long as we need it to provide you with service and to meet legal requirements. When we no longer need the information, it is either destroyed or made anonymous.

***What safeguards do you have in place to keep personal information confidential?***

We use a variety of security measures such as restricting employee access to files and data centres, using fireproof and locked file cabinets, and employing a variety of electronic security measures, such as passwords, personal identification numbers and data encryption techniques.

Only those employees who need personal information to provide service have access to it. It is a condition of employment that all HSBC employees conform to our Privacy Code and sign a written promise to observe the highest standards of confidentiality for each customer's personal information.

***Can I find out what information you have concerning me and who you have given it to?***

At any time, you can find out what personal information we have, what it is being used for and to whom it has been disclosed. However, in some specific circumstances, disclosure of your personal information to you can or must by law be denied, for example when: the information is protected by solicitor/client privilege; disclosure of the information would also reveal personal information about another person; or, disclosure would reveal confidential commercial information. We do not keep records regarding the disclosure of personal information for routine purposes such as cheque printing, tax reporting to the government, updating credit information to credit bureaus or indicating to third parties when cheques are returned NSF. We will do our best to provide the required information to you within a reasonable time period after receiving your written request and will provide an explanation if we are unable to meet your request. Generally we will respond to inquiries free of charge and, in the event that the inquiry is sufficiently complex to warrant a charge, we will provide an estimate of the amount in advance.

***If my personal information is inaccurate, can it be changed?***

Yes, we will correct inaccurate or incomplete information within a reasonable time and will notify you when we have done so. There is no charge for correcting your information. In the unlikely event we have given incorrect information to others, we will ensure they are advised of the required corrections. You may access your Personal Information in our possession or make corrections to it by visiting your HSBC office or HSBC branch. We will assist you to complete the necessary forms.

We may have obtained a credit report in connection with your application for products or services from either Equifax Canada or TransUnion Canada. If you have questions about or wish to correct your credit bureau file, you may contact Equifax Canada Inc. at 1-800-465-7166 or TransUnion Canada at 1-866-525-0262 outside Quebec or 1-877-713-3393 in Quebec.

## **Recording of Telephone Calls**

Telephone calls to and from HSBC may be recorded for quality assurance and as a record of the information exchanged.

## **Access to Information by Self-Regulatory Organizations**

For HSBC Securities (Canada) Inc., including HSBC InvestDirect clients, for regulatory purposes, self regulatory organizations including Market Regulations Services Inc., the Investment Dealers Association of Canada, the Mutual Fund Dealers Association of Canada, Bourse de Montreal Inc., and the Canadian

Investor Protection Fund (collectively, “SRO”) require access to personal information of current and former clients, employees, agents, directors, officers, partners and others that has been collected or used by Regulatory Persons. Please contact your local branch for more information or visit our website at for HSBC Securities and for HSBC InvestDirect.

## **What to do if you have a question, concern or complaint about privacy with HSBC**

We are committed to setting the highest customer service standards in the financial services industry. We hope you will give us the opportunity to correct any situation that does not meet your expectations.

If you have a question, concern or complaint about the way in which personal information is collected, used or disclosed by HSBC, please contact the Privacy Administrator found in each HSBC office.

Unresolved questions, concerns or complaints may be directed to HSBC’s Privacy Officer. Receipt of your complaint will be acknowledged in writing or by telephone. Upon completion of a detailed investigation, the Privacy Officer will provide a written response. You may contact the Office of the Privacy Officer at the following:

The Office of the Privacy Officer  
HSBC  
#300 - 3555 Gilmore Way  
Burnaby BC V5G 4S1  
Telephone: 1-866-373-2738  
(8:30 am – 5:00 pm Pacific Time)  
Fax: (604) 435-4139  
Email:  
privacy\_officer@hsbc.ca

## **Strictly between us**

At HSBC, we respect your privacy and are committed to keeping personal information about you strictly between us.

If you have any concerns about Privacy we want to know about them. Write, call, or visit. Keep in touch and let us know what’s on your mind. We’re always ready to help.

† In this Privacy Notice, “HSBC” includes HSBC Bank Canada and its subsidiaries: HSBC Investments (Canada) Limited; HSBC Investment Funds (Canada) Inc.; HSBC Securities (Canada) Inc. (including HSBC InvestDirect); HSBC Trust Company (Canada); HSBC Mortgage Corporation (Canada); HSBC Loan Corporation (Canada); and HSBC Insurance Agency (Canada) Inc.

HSBC Securities (Canada) Inc. and HSBC InvestDirect are members CIPF. Effective January 1st 2004, HSBC InvestDirect is a division of HSBC Securities (Canada) Inc.

†† “HSBC Group” means all entities in which HSBC Holdings plc holds, directly or indirectly, a controlling interest.

## **Your choices**

We value your relationship and believe how you deal with us is your choice. By sharing your information within the HSBC group of companies, we can provide you with all the financial services you may ever need to build and maintain your wealth.

However, if you wish to limit how we use your information, you can contact us at 1-888-310-HSBC (4722) or visit our website at [www/hsbc.ca](http://www/hsbc.ca) and click the Privacy link to access the Privacy Choice form. This will allow you to express your preference that HSBC may not:

- collect, use or share your personal information within the HSBC Group, to identify and inform you of products and services provided by the HSBC Group that may be of interest to you;

- collect or use your personal information to promote the products and services of select third parties that may be of interest to you;
- collect, use or share your SIN in order to ensure accuracy on credit checks, meet legal and regulatory requirements, or for collections, internal audit (including security), statistical, or record keeping purposes.

If you do refuse or withdraw your consent to any of the above uses of your personal information, it will not affect your eligibility for credit or other products or services.