



Privacy Notice

HSBC's Privacy Principles

HSBC Bank Canada is a subsidiary of HSBC Holdings plc which, together with its subsidiaries and affiliates, is one of the world's largest banking and financial services organizations (the "HSBC Group"). The HSBC Group has adopted the following privacy principles:

- HSBC will only collect information that it believes to be relevant and required to understand the customer's financial needs and to conduct HSBC's business.
- HSBC will use customer information to provide customers with better customer services and products.
- HSBC may pass customer information to other HSBC Group companies or agents, as permitted by law.
- HSBC will not disclose customer information to any external organisation unless HSBC has customer consent or is required by law or has previously informed the customer.
- HSBC may be required, from time to time, to disclose customer information to Governmental or judicial bodies or agencies or HSBC's regulators but HSBC will only do so under proper authority.
- HSBC aims to keep customer information up-to-date.
- HSBC maintains strict security systems designed to prevent unauthorised access to customer information by anyone, including HSBC staff.
- All Group companies, or HSBC staff and all third parties with permitted access to customer information are specifically required to observe HSBC's confidentiality obligations.

Your privacy

At HSBC, we respect your privacy and are committed to protecting your personal information. 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[†], and is available on our website hsbc.ca or at your nearest HSBC branch. This 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 your consent for these purposes during the customer application process, at the time of collection or through other communications with you. We provide you with the ability to refuse or withdraw your consent to collection and use of your personal information for the purposes which are set out under "Your choices" at the end of this notice. If you refuse or withdraw your consent for these purposes, we will explain the consequences to you. Refusing or withdrawing your consent in other circumstances may make you ineligible to receive products and services from us. 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 reporting agencies 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 or service with us for which credit worthiness is relevant.

Cookies

A cookie is a small file that is passed from our website to your device. The cookie is used to save information about the interaction between you and our website or online banking platform, such as login credentials, preferences, and any work in progress. The cookie file is automatically stored by your browser on the local hard drive, and it can later be retrieved by our website. HSBC Bank Canada and its subsidiaries have webpages and online platforms which use the following cookies:

Session cookies – these are temporary cookies that disappear once you leave a website. Services such as our online banking service and Live Chat feature use these cookies to identify if a secured session has been established. Please note that in order to use these types of services you must not disable your session cookies. If you wish to amend your cookie settings, please access the “Help” portion of your browser or contact your browser provider.

Persistent cookies – these are cookies that are stored permanently on your computer. These cookies are used as a means of collecting information on general website usage. The information they gather is used only to help HSBC Bank Canada and its subsidiaries make improvements in navigation, and provide a means for us to ensure our websites continue to meet site users’ needs. If you wish to amend your cookie settings, please access the “Help” portion of your browser or contact your browser provider.

Tailored content cookies – these are a type of persistent cookie our website and online banking platform uses to provide you with content and product offers tailored to you. Our website uses Celebrus Dynamic Collection (“Celebrus”) technology to gather information about which pages you visit on our website, how you journey through it, and how you interact with it and its content.

If you leave tailored content cookies enabled when you log into our online banking service, your activities (i.e. looking at mortgage pages) may trigger a sales call from one of our HSBC representatives.

You can turn off (opt out of) these tailored content cookies without impacting any of the functionality of our website or online banking service. To opt out of tailored content cookies [click here](#).

The opt-out process involves setting a cookie (a small text file) to your browser that indicates your choice. If you have previously opted-out of tailored content cookie data collection, you can choose to opt back in on this same page.

Please note:

- If you visit our website from other browsers on your device or other browsers on other devices you will need to opt-out of tailored content cookie data collection on those other browsers and machines, too
- If you delete all of your cookies it will be necessary to carry out the opt-out process again
- Your browser must be set to allow first-party cookies for our website for the opt-out process to work. If your security settings are too high and the first-party cookie is blocked we will be unable to implement your opt-out request. You will be advised via a pop-up window that this is the case and should repeat the opt-out process at a lower security setting before you return to our website.

If you would like to learn more about the data technology they use, please visit the [Celebrus website](#).

Third-party cookies – Third-party cookies are created by a website with a domain name other than the one you are visiting. Third-party cookies are often allowed by web browsers. You can disable / enable first- and third-party cookies using the settings / preferences feature of your web browser.

Frequently Asked Questions about cookies

Can cookies pass on my personal information to others?

We may use 'analytics' cookies (a type of persistent cookie) to help us make our website better for those who visit it regularly and in doing so we do share certain limited information with third party 'analytics' providers acting on our behalf. For example, we work with third party analytics providers to track usage within our Digital Services. These third parties provide us with statistics showing which pages are visited most frequently and how long visitors spend on each page. We use this information to help us plan how to improve these services.

See the [Behavioural Advertising Section](#) below for information about how data may be shared by HSBC for the purposes of tailoring advertisements.

Do cookies compromise my security when I'm logged on to online banking on our local website?

No. The cookies we use are safe. In fact, many of them are used purely to provide important security features such as to help protect your data and your accounts.

If I use a public computer, will someone be able to get my details from the cookies stored on the public computer?

Our cookies cannot be read by anyone else who has access to the computer to find out anything about you, other than the fact that someone using the computer may have visited our website. The cookies from our site do not in any way compromise the security of internet banking.

Behavioral Advertising/Online Tracking

Information about your online activities on this and other websites (e.g. pages viewed), may be used by HSBC and third-parties (e.g. ad networks) to select an ad to display on this or other websites for a product, service, or offer that matches your interests. This advertising practice is called online behavioural advertising (OBA) or interest-based advertising. We allow you to exercise choice regarding the collection and use of information by third parties for online behavioural advertising purposes by going to these sites to opt-out: [Network Advertising Initiative](#) or [Digital Advertising Alliance](#). Opting out means you will still receive online advertising but the advertising will not be tailored by the listed third-parties based on your online behaviour or usage.

If you wish to amend your cookie settings, please access the "Help" portion of your browser or contact your browser provider. Please note that in order to use our internet banking service, you must not disable your cookies. Our internet banking service requires session cookies to identify if a secured session has been established.

Answering your questions about privacy

What personal information do we 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 for other optional purposes as described in the "Your choices" section at the end of this notice.

How is your personal information collected, used and disclosed?

We collect, use and disclose your personal information to: provide you with products and services; meet Compliance Obligations; and conduct Financial Crime Risk Management Activity. For these purposes, we may disclose your personal information, in a manner that is reasonable and proportionate, to:

- any member of the HSBC Group;
- sub-contractors, agents and service providers;
- authorities with jurisdiction over any part of the HSBC Group;
- financial institutions, credit reporting agencies, and financial industry databases (which may share information with other industry members);
- insurers where permitted by law; and
- the categories of third parties that we bring to your attention during the customer application process, at the time of collection or through other communications to you.

Providing you with Products and Services

In order to provide products and services, we will collect, use and/or disclose your personal information to:

- evaluate your application for and assess our willingness to provide you with products and services;
- open, maintain, close and collect on your account(s);
- provide you with financial and credit products and services and assessing credit and eligibility;
- approve, manage, administer and effect transactions and provide other products and services you request or authorise;
- evaluate the current and future needs of our customers and to help manage our business;
- honour your privacy choices;
- maintain the accuracy and integrity of the credit reporting system;
- verify your identity, conduct credit checks and obtain or give credit references;
- meet legal and regulatory requirements;
- enforce or defend our rights or those of a member of the HSBC Group;
- conduct our internal audit and security functions – these functions allow us to monitor our systems and processes. This helps protect you and us from fraud, identity theft and unauthorized access to your accounts;
- for our internal operations or those of the HSBC Group (including credit and risk management, system or product development and market research, insurance, and processing, transfer and storage of records).

Meeting Compliance Obligations and Conducting Financial Crime Risk Management Activity

All members of the HSBC Group are committed to conducting business in a way that complies with applicable laws and actively contributes to the safety and stability of the financial markets and discourages behaviour that threatens the legitimate use of global banking systems. To do this, members of HSBC Group:

- comply with any reporting, disclosure or other obligations under any applicable local or foreign laws, regulations or voluntary codes, sanctions regimes, judgements or court orders, agreements with or demands from authorities (including tax authorities) having jurisdiction over any part of the HSBC Group ("Compliance Obligations"); and
- engage in "Financial Crime Risk Management Activity"

Financial Crime Risk Management Activity includes:

- the detection, investigation and prevention of Financial Crime including: money laundering, terrorist financing, bribery, corruption, tax evasion, fraud, evasion of economic or trade sanctions and acts or attempts to circumvent or violate laws, regulations, and/or directives relating to these matters;
- screening, intercepting, and investigating instructions, communications, drawdown requests, applications for services, or payments sent to, by you, or on your behalf;
- investigating who sent, received, or was intended to receive funds;
- combining Customer Information with related information that HSBC Group has; and
- making enquiries about a person or entity's status or identity, including whether they are subject to sanctions.

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.

We may also collect information from other members of the HSBC Group and from public sources. Of course, we obtain consent from you before we contact anyone for information about you.

In what circumstances is personal information disclosed without consent?

Generally, we do not disclose your personal information without your consent.

There are however, some exceptions. For example, we sometimes acquire 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, your personal information may be accessed by authorities in Canada or such other countries to which the information has been transferred. If you would like further information about the policies and practices of HSBC with respect to the use of service providers outside Canada or have any questions regarding collection, use or disclosure of your information by such service providers, please contact the HSBC Privacy Officer at the address and phone number provided herein for making enquiries. 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, or 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 Investment Funds (Canada) Inc. and HSBC Securities (Canada) Inc. (which includes the division of HSBC InvestDirect), the applicable self-regulatory organization may require access to personal information. These self-regulatory organizations may include the Investment Industry Regulatory Organization of Canada, the Mutual Fund Dealers Association of Canada, Bourse de Montreal Inc. and the Canadian Investor Protection Fund. They may access personal information of current and former clients, employees, agents, directors, officers, partners and others that has been collected or used by Regulatory Persons. Please refer to your product or service terms and conditions for more information.

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

Step 1

Start with your HSBC Representative

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.

Feel free to reach out to us by telephone, email, secure internet banking message, letter or in person.

Toll-free line

Personal: 1-888-310-HSBC (4722)

HSBC Premier: 1-866-233-3838

Business: 1-866-808-HSBC (4722)

Email:

info@hsbc.ca

Internet Banking Secure Message

You can also reach us by logging onto your Internet Banking account and sending us a secure message.

HSBC Branch

For help finding the address of your nearest HSBC Office, please use our Branch Locator at www.hsbc.ca/atm.

Step 2

Contact HSBC Customer Relations

The majority of our customer's complaints are resolved by one of our HSBC representatives. If your complaint has not been resolved to your complete satisfaction despite their best efforts, the HSBC representative will escalate matters on your behalf to the HSBC Customer Relations Office.

To ensure your concerns are fully addressed in a prompt and efficient manner, the HSBC representative will provide the Customer Relations Office with the following:

- Pertinent facts related to your complaint
- Name and location of the HSBC representative with whom you initiated this matter
- Names of any other individuals involved

If you wish to contact Customer Relations directly, they may be reached at:

HSBC Customer Relations Office

2910 Virtual Way

Vancouver, BC V5M 0B2

Toll-free: 1-888-989-HSBC (4722)

Email: customer_relations@hsbc.ca

The HSBC Customer Relations Office will acknowledge receipt of your complaint by email, telephone or mail, according to your preference. They will also provide you with their contact information to enable you to obtain

details on the status of your complaint. Following a detailed investigation, they will provide you with a written response in the agreed upon timeframe, containing details of their investigation, their decision and an explanation on how they reached this decision.

The HSBC Customer Relations Office also handles customer complaints directed to the Office of the President and Chief Executive Officer.

Step 3

Contact HSBC Privacy Officer

If you are not completely satisfied with the resolution reached by the HSBC Customer Relations Office, they will provide you with the HSBC Office of the Privacy Officer's contact information and you may escalate your complaint.

The HSBC Office of the Privacy Officer will only address your concern once it has been fully investigated by the Customer Relations Office.

The HSBC Office of the Privacy Officer will acknowledge your complaint and following a detailed investigation, provide you with a written response.

At HSBC, we respect your privacy and are committed to safeguarding your personal information.

A copy of the HSBC Privacy Code is available through your local HSBC branch or at www.hsbc.ca

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:

1. Visit your local HSBC [branch](#) or office
2. Call us at 1-888-310-HSBC(4722)

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, conduct Financial Crime Risk Management Activity, or for collections, internal audit, 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.

Issued by HSBC Bank Canada

[†]In this notice, "HSBC" includes HSBC Bank Canada and its subsidiaries: HSBC Global Asset Management (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); HSBC Insurance Agency (Canada) Inc.; HSBC Finance Mortgages Inc.; HSBC Retail Services Limited; HSBC Private Wealth Services (Canada) Inc.; and Household Trust Company.

HSBC Securities (Canada) Inc. is a member of the Canadian Investor Protection Fund. 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.