

# Privacy Booklet

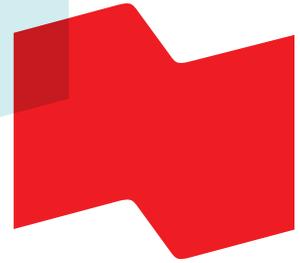
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# About this booklet



This first booklet on **privacy** is produced by National Bank's Privacy Office. It is a testament to our commitment to being transparent and offering you an experience in line with your expectations.

Privacy is one of the Bank's priorities. Over the years, measures have been put in place to reinforce our practices and earn your trust. These practices are set out in this booklet. We will keep you informed of any related progress and results on an annual basis.



## Scope

The information in this booklet covers the activities of the Bank and its main subsidiaries for the period from November 1, 2019, to October 31, 2020.

## Who it is for—stakeholders

This booklet aims to foster an ongoing dialogue between the Bank and its clients, employees, shareholders and service providers as well as communities, interest groups and regulatory authorities. This dialogue helps us enrich our practices and aim for the most advanced privacy and disclosure standards.

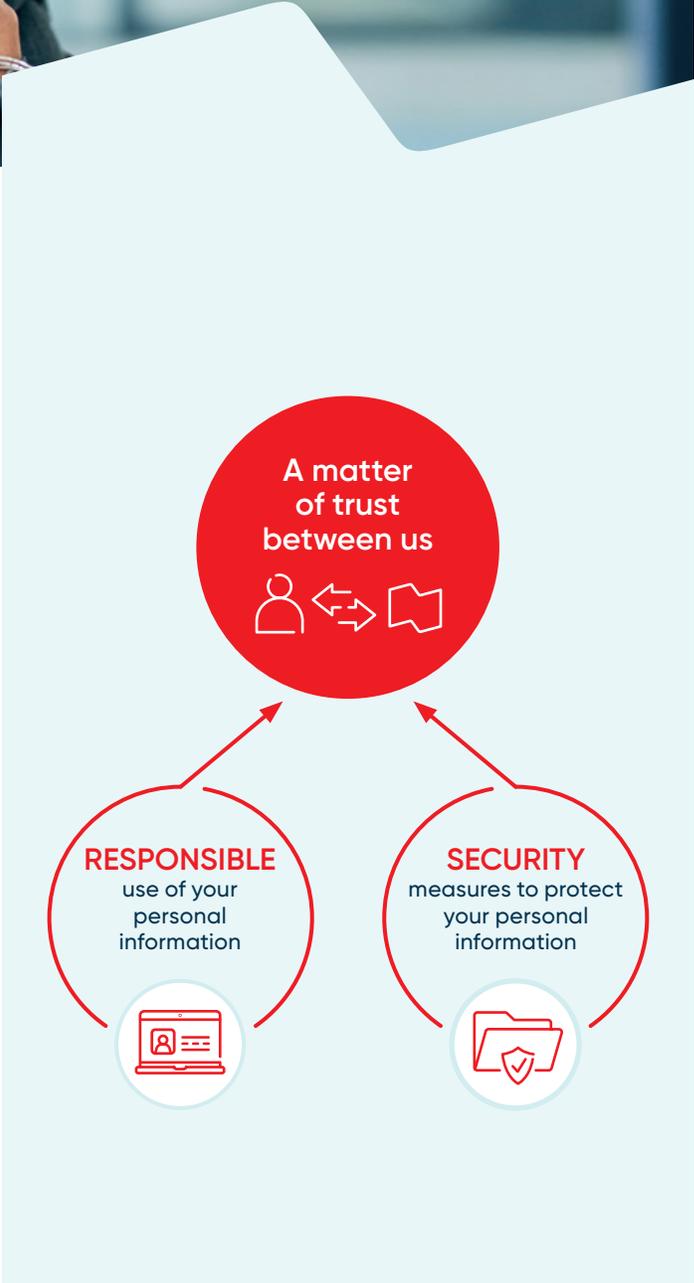


# Our commitment

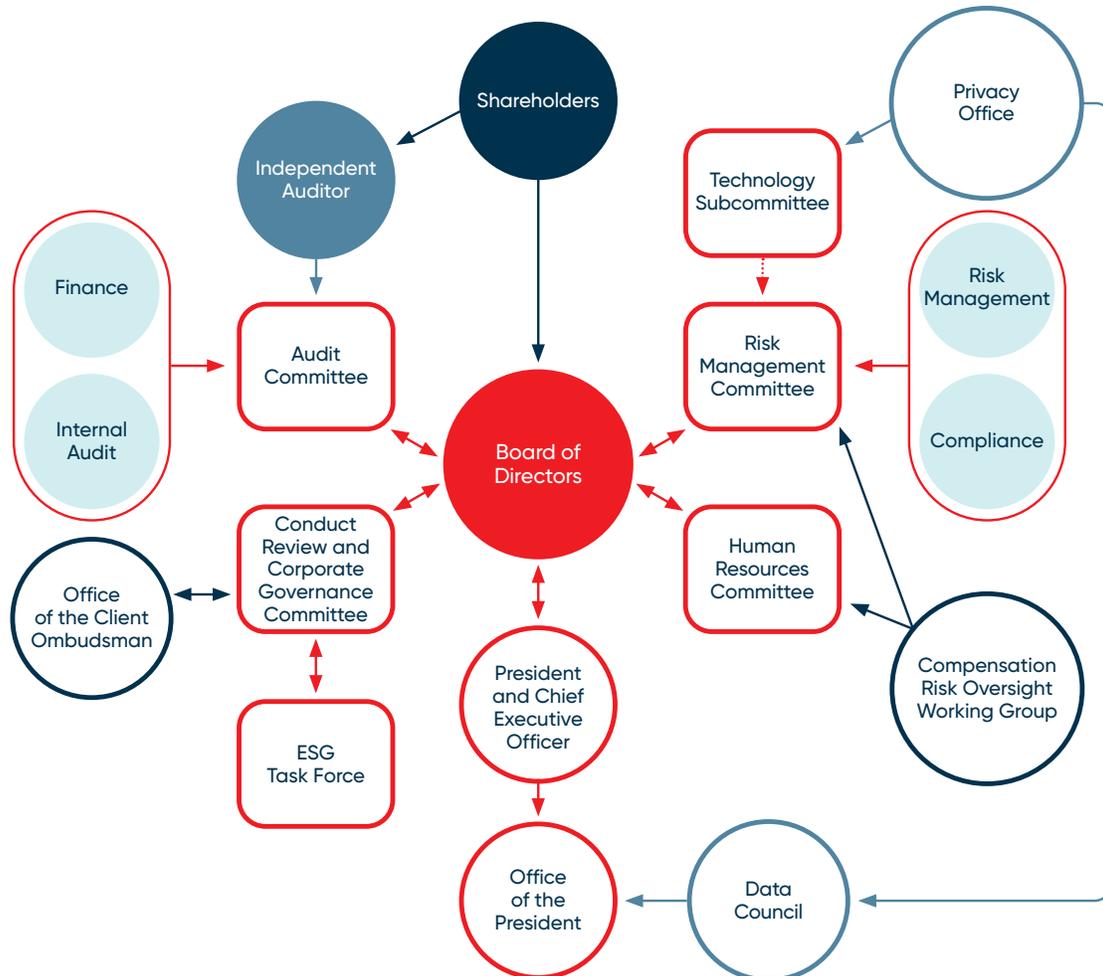
We do our utmost to ensure the protection of your personal information. All of our employees work together towards this goal.

**Our commitment to you is simple: to build and maintain a relationship of trust.**

Our commitment is aligned with the Governance component of our Environmental, Social and Governance (ESG) principles, which have been approved by the Bank's Board of Directors. Our commitment to privacy advances the United Nations (UN) Sustainable Development Goals, and goal 16 in particular: Peace, Justice and Strong Institutions. We have put in place a governance framework for the protection of personal information to ensure that we protect your information and maintain a relationship of trust with you.



# Our governance framework



## Privacy Office

The Privacy Office is headed by the Chief Privacy Officer, whose responsibilities include oversight related to:

- › Implementing our policies, standards and practices;
- › The privacy risk governance framework; and
- › Establishing appropriate controls for risk mitigation.

The Office's responsibilities include:

- › Supporting the Bank's business sectors in carrying out the adopted strategic orientations;
- › Ensuring compliance with best practices;
- › Analyzing emerging issues that may affect our internal practices and our commitments to you; and
- › Making recommendations to various decision-making levels.

## Board of Directors and various committees

The Bank's **Board of Directors**, through the **Risk Management Committee** and the **Technology Subcommittee**, ensures that the Bank's technology strategy as well as its oversight and management of technology risks, including cyber risks, cybercrime and the protection of personal information, are properly applied and carried out.

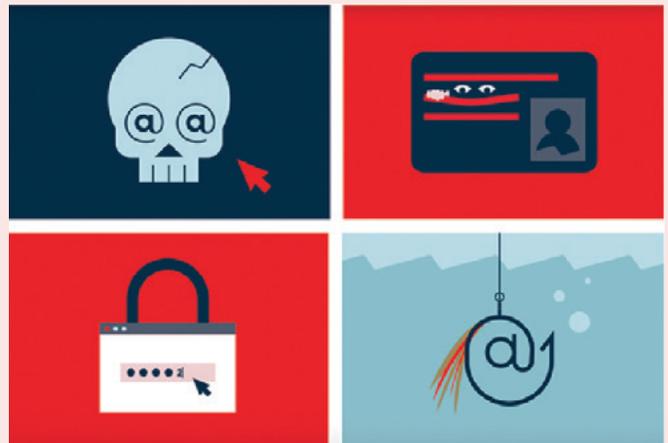
The **Data Council** is composed of the Bank's executives and is interested in how the Bank manages data, including personal information, with a mandate to set the Bank's strategic orientations. At its monthly meetings, the Council is required to approve initiatives involving personal information that could have a significant impact on the orientations adopted by the Bank. The Data Council is supported by committees that assist in data risk oversight. For example, the **Data Risk Committee** oversees the integration of data risks, including privacy risks, into the risk management processes across various sectors.

The Privacy Office periodically presents the various committees with:

- › Reports on privacy risks, compliance with legislative and regulatory requirements, and the status of strategic initiatives; and
- › New facts as well as emerging trends that may impact current practices.

### Protecting personal information, a shared responsibility

The protection of personal information is the result of the collaboration and combined efforts of several business sectors and internal committees. Our personal information governance involves a **reporting process**. This process enables us to gauge the effectiveness of our practices so we can make decisions based on our commitment to you, our risk appetite and our ambition to offer you innovative products and solutions.



# Our privacy practices

We oversee the protection of your personal information as follows:

- › With a **privacy policy**, in which the Bank sets out the responsible practices it has adopted for the collection, use and disclosure of your personal information.
- › Through effective **internal controls** to detect and prevent incidents throughout the entire lifecycle of personal information.
- › Through **continuous risk assessment**: everyone at the Bank contributes to identifying and mitigating risks, whether they are new or created as a result of technological changes, procedures or business initiatives.
- › Through **complaint and incident management**.
- › By providing **training** to all our employees:
  - Training for new hires
  - Raising awareness on an ongoing basis (for all employees)
  - Targeted courses (for certain business sectors)

## Privacy Policy

We have developed our privacy policy with you in mind. **Your consent is the cornerstone of our practices**: we respect your choices and act based on the consent you have given.

This policy explains, among other things:

- › What types of personal information we collect and the reasons why we collect it;
- › The choice you have in consenting or not to certain uses of personal information;
- › The reasons why we may disclose your personal information to third parties (partners or service providers); and
- › Our approach to retaining your personal information.

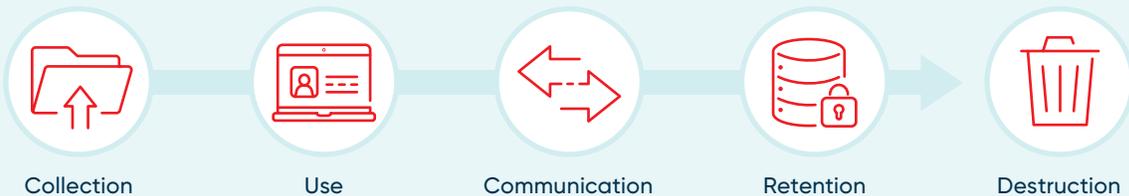
The policy also informs you about your rights to:

- › Access and consult the personal information we have about you;
- › Correct your personal information to ensure its accuracy;
- › Opt out of receiving our product and service offers and other promotional communications at any time.

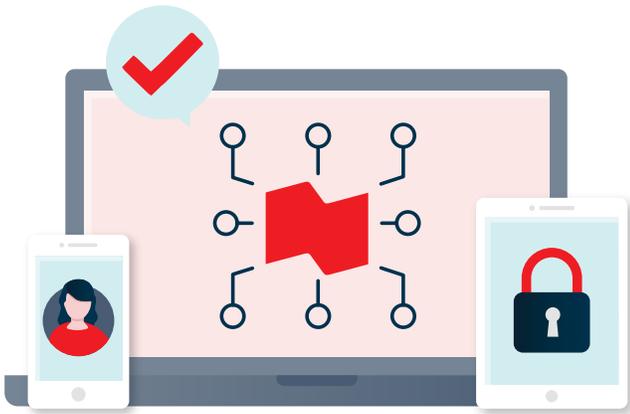
We will notify you of any significant changes to our policy when you enroll in new products or services through our digital channels and telephone banking services or via any other appropriate means we may use to communicate with you.

**Guarantee: We will not sell your personal information to third parties. Ever.**

### Lifecycle of personal information



For more information about our practices, please see our [Privacy Policy](#).



## Relationship with our service providers

We do not neglect the security of your personal information when it must be sent to third parties. We take great care in choosing our business partners and service providers. They must sign service contracts that include security and confidentiality commitments. They agree to use only the personal information required to provide their service, and must be as diligent and cautious as we are to ensure the security of your personal information.

## Training and awareness

Our approach is as follows:

- 1 Mandatory training for new hires that makes new employees aware of the importance of privacy for the Bank and our clients, and equips new employees with the tools to protect this information.
- 2 Continuously raising awareness through training modules and activities to keep employees informed.
- 3 Targeted training to support certain business sectors, for example, when deploying a new initiative or improving processes.

Our goal is to have **dedicated employees who are aware** of the importance of protecting your personal information. Training is offered at all levels of our organization.

## Complaint and incident management

### Complaint management

The Bank wants to offer you quality products and services as well as a personalized client experience in line with your expectations. Your complaints and dissatisfactions are taken very seriously.

Our branch advisors and Privacy Office work together to answer your questions about the protection of your personal information, to guide you and find solutions that are right for you.

You have several simple options to communicate your complaints to us:

- › By directly contacting our customer service;
- › By submitting a request to the Office of the Ombudsman for Clients (form available online); and
- › By contacting an external organization (as a last resort).

Complaints are handled confidentially.



For more information, please see our [complaint settlement process online](#).

### Incident management (loss, destruction or theft)

We work with several teams to protect your personal information from loss, destruction or theft. We have practices in place that allow us to identify and fully understand the risks, and rectify situations that put your personal information at risk. We are also improving the internal controls that are already in place.

If a situation arises, we take the lead in notifying the relevant regulatory authorities as well as any affected clients. Our goal is to reduce and mitigate risks by offering you appropriate solutions based on the situation.

# Our performance in 2020

Our practices are evolving. We are continuously improving our performance indicators to better assess the quality of our practices. Our goal is to improve the effectiveness of our strategies and operational processes.

We have implemented an indicator based on the number of decisions made annually by regulators regarding the Bank.



## Questions or comments?

Your feedback is important to us. We are committed to following up on it in a straightforward manner so you can understand how we handle your personal information.

If you have any questions or comments, please contact:

- 1** Your branch's Customer Service Manager
- 2** Chief Privacy Officer at:  
[confidentiality@nbc.ca](mailto:confidentiality@nbc.ca)  
or  
600 De La Gauchetière Street West, 4<sup>th</sup> Floor  
Montreal, Quebec, Canada H3B 4L2

