

Our privacy policy

At Wyth, we are dedicated to protecting your privacy and safeguarding your Personal Information.

Our Privacy Policy describes the Personal Information we collect, what we do with that information, and your rights and choices. By communicating with us, requesting one of our products or services, visiting this website, or otherwise interacting with us, you agree to this Privacy Policy. If you have any questions as you review this Privacy Policy, remember that you can always contact us at 1-800-788-6311 or answers@wyth.ca.

There are a few important terms to know as you read through this Privacy Policy:

- Wyth Financial is a trade name of Concentra Bank and Wyth Trust is a trade name of Concentra Trust.
- “Wyth” (also “we” or “us”) means Concentra Bank, and Concentra Trust, a wholly-owned subsidiary of Concentra Bank.
- “Personal Information” means information that identifies you or can be used to identify you.

This Privacy Policy does not cover anonymous, de-identified, or business contact information.

Collecting your information

We usually collect Personal Information from you when you interact with us, like when you request a product or service, call or email us, or visit our website. We also collect Personal Information from credit reporting agencies and others for some products and services. The types of information we collect depends on factors like the product or service we’re providing and our legal requirements.

When and how we collect your information

We collect your Personal Information when you interact with us or when you apply for or use a product or service. We collect your information when you:

- Apply for, or provide a guarantee for, a product or service
- Receive or use a product or service
- Use our App or bank online
- Communicate with us, including by phone, email, messaging or social media
- Visit our website or one of our locations
- Sign up for special offers, one of our webinars or complete a survey
- Agree to someone else providing us with your information

We may collect information from you indirectly or from other sources, such as:

- Referral partners
- Credit unions, banks or other financial institutions
- Credit bureaus and reporting agencies
- Insurers involved in the product you apply for, such as mortgage insurance
- Government institutions or regulatory authorities (including law enforcement)

- Your employer (where they have an employer-offered registered plan)
- References you provide us
- Social media sites
- Telecommunications and other verification service providers
- Publicly available directories and government registries

Types of information we collect

The types of information we collect depends on a number of factors. Some examples of these factors are the product or service you have or are applying for, our legal requirements, and whether you're engaging with us through our online banking platform, our App, in-person or through a third party referral partner.

The main categories of Personal Information we collect are:

- **Contact information** that allows us to communicate with you. This includes your name, address, phone number, email or social media account name.
- **Authentication information** that allows us to establish or verify your identity. In addition to contact information, this includes your username and password, date of birth, and identity documents that confirm information about you. We may also verify your identity or authenticate your account access using analysis of your online activity, device information (including the device's browser and operating system), IP address, location, and information provided by your telecommunications service provider.
- **Background information** to assess and manage risk, such as legal "know your client" or details about your citizenship, residence status, your primary business or occupation, your employment history, your tax identification number, and whether you fall into special categories of people defined by tax, anti-money laundering and anti-bribery law.
- **Social Insurance Number (SIN)** to comply with legal and regulatory requirements, including tax and land owner transparency laws. In other cases, we request your SIN to help identify you and prevent errors and fraud (for example, to ensure accuracy when we request credit information from a credit reporting agency), but this is optional.
- **Financial and transaction information** that allow us to assess your eligibility for products and services and, if appropriate, offer and provide them. This includes your annual income, investments, account balances, financial behaviour, assets and liabilities, transaction history, financial objectives and details of security provided for loans. We also collect credit reports, history and other credit information from you or credit reporting agencies. Some types of financial and transaction information, like credit information, is updated periodically to assess ongoing eligibility and risk factors.
- **Phone call recordings and records of other communication with us**, to respond to your requests, confirm our discussions with you, and improve customer service. These records can include emails, chats, notes, messages over social media and letters.
- **Your preferences and online activity**, such as your contact and language preferences which allow us to improve and personalize your experience. We use cookies and similar tools to improve our website and services. We also use them to promote our products or services that may be relevant to you.
- **Your image**, when you provide it to us (including a picture or copy of a government-issued photo ID) as part of a customer identification process or you have provided an image for your

online banking profile. We may also collect your image if you are recorded by video surveillance at one of our locations.

- **Any other information you choose to provide to us**, such as family details, life events, goals, and issues you may have encountered. This includes information related to the administration of your estate or that is required to provide our trust services, like information about family members and beneficiaries, and about an estate's specific assets and liabilities.

In addition, when you apply for a product or become a client, Wyth generates and maintains information about your account and its status, such as account number and features, the type of product, account balance, the rights of any third parties on the account and the terms of any contract you have with us.

Note that we also collect Personal Information about business clients such as sole proprietorship or partnership client details and information about directors and signing officers of corporations.

If you provide us with Personal Information about others, such as joint account holders or beneficiaries, you are representing that you have their consent or another legal basis to do so.

Consent

We may obtain your consent to collect, use, disclose and share your information in different ways, depending on the situation and the sensitivity of the information. The main way we obtain consent is through your agreement to this Privacy Policy.

Additional consent to the collection and use of Personal Information beyond what is described in this Privacy Policy may be obtained verbally, online, in writing from you or through your use of a product, service or banking or communication channel.

We do not knowingly collect Personal Information from children. Children under the age of 18 should not contact us or provide Personal Information. Children under age 18 may only provide us with information with express consent of their legal guardians.

There are limited situations permitted by law where we may be required to collect Personal Information without your knowledge or consent such as for investigations, legal proceedings or where the information is publicly available.

How we use your information

We use your information to provide you with products and services you requested and to make sure you're eligible for them. We also use your information for other purposes related to running and growing Wyth, like improving and promoting our products and services, confirming your identity, protecting us and our customers, and meeting legal requirements.

We may use your Personal Information for the purposes communicated to you at the time of collection or in your agreements with us, including:

- To assess your eligibility for and provide you with the products and services requested
- To fulfil contractual obligations covered in agreements you have entered into with us
- To meet legal and regulatory requirements (e.g., tax, anti-money laundering, criminal, consumer protection, banking, privacy, estate, trust, real estate and other laws, and for audit purposes)

- To verify your identity and to authenticate you when you contact us
- To operate and improve our business and minimize any errors or disruption to our services
- To communicate with you about your application, account, and any benefit, feature or other information about our products and services
- To manage our relationship with you, including consolidating information across multiple Wyth companies (e.g., Wyth Financial, Wyth Trust, as permitted by law)
- To share information about third party products or services that may be of interest (which you can opt-out of)
- To better understand your financial situation and determine your eligibility for products and services we offer, including assessing your creditworthiness and establishing credit limits
- To create statistical, aggregated or other reports, analysis and predictive models, rules and insights (in most cases your information will be anonymized or aggregated in a way that does not identify you beforehand)
- For the purpose of fraud, crime prevention, suppression or detection, investigations, debt collection and legal proceedings
- To assess and manage our risks and operations

In some cases, additional uses of your information will be described in the application or agreement for particular products or services. We will indicate clearly which information would help us to serve you but is optional for you to provide.

Sharing your information

Under certain circumstances, your Personal Information may be shared among Wyth companies or other third parties including to provide services, manage our relationship with you and meet legal requirements.

Wyth Financial and Wyth Trust

We may share information within Wyth companies to manage your total relationship with us and assist us in helping you achieve your financial goals. It's part of building and maintaining a positive advice-based relationship with you. We may share this information to better understand your financial needs and to provide products and services we believe may interest you. In many cases, you may opt out of this sharing of your information.

Wyth referral partners, service partners, or agents who act on our behalf

We may be required to provide reports to referral partners or agents who we have engaged to act on our behalf. We only provide the information necessary to fulfil our contractual referral or agency obligations and we require them to protect the information in a manner consistent with our privacy and security practices. Referral partners or agents are generally organizations that you have a primary relationship with.

We may engage service partners to conduct processes on our behalf. We only provide the information necessary for them to perform the services they have been specifically engaged to undertake for us. We conduct due diligence respecting privacy and security when engaging with a new service partner and we

contractually require them to protect the information in a manner consistent with our privacy policies and security practices.

Credit reporting agencies

When you have a credit product with us, we exchange information about you with credit reporting agencies on an ongoing basis. This can include information about your identity, your current and past credit accounts, your credit history, and other information that the credit reporting agency has collected from your other lenders. Credit reporting agencies may also log when we perform a credit check, like when you apply for a credit product. We also update your information with credit reporting agencies to help maintain the integrity of the credit reporting system.

Other authorized people

Depending on the situation, we may share information about you with others that are involved in an account or are allowed access to certain information about an account. The Personal Information we provide them depends on their authorization. Here are some examples of people with authorization:

- **Joint account holders:** people who jointly hold an account have access to all account information
- **Guarantors, indemnitors and insurers:** we will share certain information with people who are providing a guaranty, indemnity or insurance in relation to a product you have with us
- **Estates:** we share information with estate representatives and beneficiaries and other parties as required in relation to the administration of your (or a joint account holder's) estate or related financial affairs
- **Other representatives:** if we have a reasonable basis to believe someone is acting as an authorized representative for you or is someone who has a right to your information (such as a guardian, power of attorney, lawyer or other professional advisor), we will share information that they are authorized to receive

Other third parties

We will only share your information with other third parties with your consent, as indicated under your account agreement and accepted terms and conditions, or under limited scenarios permitted by law, including:

- To respond to authorized information requests from domestic and international authorities
- To consider or complete a transaction (including the purchase or sale of a business or part of a business, a corporate reorganization, or the insuring or securitization of assets)
- To comply with laws, regulations, subpoenas or court orders
- For the purposes of fraud or crime prevention, suppression or detection, including managing our security risks
- To protect the safety of employees, clients or other third parties
- To protect our assets and interests, conduct investigations, to help us collect a debt, or to manage or settle any actual or potential loss in the case of a breach of agreement or contravention of the law

Under no circumstances do we ever sell any customer's Personal Information. Also, we do not release information to others, including spouses, relatives or friends, without your written authorization or where permitted by law such as in emergencies or to prevent fraud.

International transfer of your information

Your Personal Information may be transmitted through, stored or processed in countries other than your home country, in which case the information is governed by the laws of these countries and may be subject to law enforcement access.

Cookies

We use cookies on our websites in order to personalize your experience, improve our sites, products and services, and promote products of interest to you.

Cookies are essentially small packages of data stored on your internet browser that tell us about your browsing behaviour. We use that information to record and monitor usage of our website and improve it. We may also use this information to improve our marketing.

You can manage and delete cookies in your browser's settings. For more information on cookies and how to manage them, check the support pages for your browser.

Google Analytics

We use Google Analytics to better understand your use of our website. Google Analytics collects information on user behaviour on our website, which includes how many times a user visits our website, what pages they visit, and where they were referred from. Advertising identifiers for mobile devices (such as Android and iOS Advertising Identifiers) are also collected. Google uses this data to prepare reports on its activities, and share them with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network.

[Learn more about how Google uses data when you visit websites using Google Analytics](#) . You can deactivate the Google Analytics function with a browser add-on, which you can download. [Download the browser add-on](#).

Facebook Pixel

We use Facebook Pixel cookies to better understand your use of our website. Facebook Pixel collects information on user behaviour on our website, which includes how many times a user visits our website, what pages they visit, and where they were referred from. Facebook uses the data collected through cookies to track and examine the use of the website, to prepare reports on its activities, and share them with other Facebook services. Advertising identifiers for mobile devices (such as Android and iOS Advertising Identifiers) are also collected. Facebook may provide us with information associated with your Facebook account, such as your likes, location and age. Facebook may use the data collected on the websites to contextualize and personalize the ads on its own advertising network.

[Learn more about how to limit the data Facebook Pixel shares and uses about you](#). You can read more about how Facebook Pixel works from [Facebook's Data Policy](#) (see "Information from partners").

Commitment to security

Wyth employs a range of technologies and security safeguards to ensure the safety, confidentiality and integrity of your information and to protect Personal Information against loss or theft, unauthorized access or modification. You should notify us immediately if you believe your account or other information has been compromised.

Wyth maintains and regularly reviews the technical, administrative and physical measures in place to protect your Personal Information. In addition to security and technology, we train employees on privacy and security requirements, require employees, contractors and service providers to commit to protecting your information, and regularly monitor compliance. Some of the uses of Personal Information described in this Privacy Policy are aimed at protecting your information, such as through identity verification and fraud prevention measures.

Wyth has a Chief Privacy Officer to address client and employee concerns and ensure that Wyth's policies and procedures align with privacy requirements and our commitment to security.

Wyth periodically engages external information technology security-certified consultants to review internal controls and benchmark to industry standards. However, as technology and risks are constantly evolving, no system can be guaranteed to be secure. You can help protect your information by using secure channels whenever you wish to provide sensitive information, contacting us immediately if you believe your Wyth account has been compromised, and notifying us if the information we rely on to serve you has been compromised by third parties.

Retention

Wyth retains Personal Information only as long as necessary to provide the products and services you have engaged us for or for other legitimate purposes such as complying with our legal obligations, resolving disputes or enforcing our agreements. In some cases this will be for the length of your relationship with us, and several years afterwards. In other cases, the retention period may be shorter.

At the end of a retention period, we will either securely destroy or anonymize your information.

Accessing your Personal Information

You have a right to request access to the Personal Information we hold about you. You can also contact us to request that we correct or delete your Personal Information.

Depending on your jurisdiction, you may also have a right to request information about the sources of your Personal Information or the types of organizations we disclose it to.

You may submit a written request for access to our Privacy Office at:

Wyth Financial
333 – 3rd Avenue North, Saskatoon, SK S7K 2M2
Email: privacy@wyth.ca

To avoid delays in obtaining your information, please provide sufficient detail to permit us to identify you and the specific information you are requesting. Do not provide sensitive Personal Information in an email unless you are able to send it securely. In some circumstances, a reasonable fee may be required to provide access.

We will endeavor to respond to your access request in a reasonable time, usually within 30 days unless circumstances require an extension. If an extension is required, we will advise you of the reasons for the extension and the expected date to fulfill the request.

In certain situations, we may not be able to provide access to all the Personal Information you request (e.g., if the information would disclose our confidential information, another person's information or if it is restricted by law or legal privilege). If this occurs, we will advise you of the reasons for the restriction subject to any legal or regulatory limitations.

If you think the information we have about you is incorrect or incomplete, you can ask for amendments or additions to your Personal Information. As we make decisions based on the information we have, we encourage you to help us keep your information current.

Your choices

Many of the reasons we collect, use and disclose your Personal Information are required in order to provide you with products, services, or communication. However, in some cases you may be asked to consent to optional uses of your information, such as our informing you of Wyth products and services that may be of interest to you or to share with Wyth partner organizations that may assist you in meeting your financial goals.

You can withdraw your consent to using or sharing your Personal Information for these optional purposes any time without impacting the service we provide to you or effecting the relationship we have with you. You may adjust your preferences by contacting our Wyth team at 1-800-788-6311 or answers@wyth.ca.

If you wish to withdraw your consent to ways in which we use or process your information that may limit our ability to provide you with certain products or services that require the use or sharing of your information, we will reach out to you to discuss the implications of such a withdrawal. There are limited situations in which you cannot withdraw consent, such as where the information is required for legal compliance or the functioning of the credit system.

Contacting us about your privacy

If you have a privacy concern or questions for our Chief Privacy Officer, please contact us:

Wyth Financial
333 - 3rd Avenue North, Saskatoon, SK S7K 2M2
Telephone: 1-800-788-6311
E-mail: privacy@wyth.ca

We will respond to questions or concerns within a reasonable time frame and will work closely with you to provide a response to your question or resolve your concern.

If we cannot resolve your concern to your satisfaction, you can also raise a concern with the Office of the Privacy Commissioner of Canada at the contact information below.

Office of the Privacy Commissioner of Canada
30, Victoria Street
Gatineau, Quebec K1A 1H3

Toll-free: 1-800-282-1376

Phone: (819) 994-5444

TTY: (819) 994-6591

Updates to our Privacy Policy

We update our Privacy Policy when needed to meet legislative changes, to provide greater transparency or in response to changes in our products or services or changes to our data processing activities or policies.

If there are material changes to the Privacy Policy, such as a change to the way in which we use your Personal Information that was not anticipated originally, we will notify you either by prominently posting a notice of such changes before they take effect or by directly sending you a notification. We encourage you to periodically review our Privacy Policy to learn how we are protecting your Personal Information.

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