

15498465 Canada Inc.

Bank Act Security Registry Privacy Notice

Defined Terms

“Act” means the Bank Act, S.C. 1991, c. 46, as amended.

“BASR” or **“Registry”** means the Bank Act Security Registry which enables security interests to be registered across Canada under section 427 of the Act.

“The Company”, “us”, “our” or **“we”** means 15498465 Canada Inc., the registry service provider under contract to administer and operate the Registry on behalf of the Bank of Canada.

“Privacy Notice” or **“Notice”** means this Bank Act Security Registry Privacy Notice.

“Registry Information” means the legal documents and information that forms part of the Registry.

“Regulations” means all regulations made by the Governor in Council respecting the Act.

“User(s)” means any visitor or user of the BASR and its associated website.

1 Introduction

This Privacy Notice applies all Users of the Registry and visitors to the BASR website. Users are responsible for ensuring they are familiar with this Policy, which provides information on how we handle personal information in connection with the use of the Registry and BASR website.

2 Policy Statement

The Purpose of this Notice is to outline our commitment to protect and manage personal information in accordance with the *Privacy Act* and the *Access to Information Act*. This Notice governs the collection, use and disclosure of the personal information we collect to operate and administer the Registry on behalf of the Bank of Canada.

3 What information do we collect?

Personal information is collected directly from Users while interacting with the Registry and corresponding with us. This includes the personal information provided to create an account with us; search the Registry; contact us to request services and provide payment for services.

3.1 Personal Information

Personal information means any identifiable information about an individual in any format. The information we collect may include:

- Contact information such as first name, last name, physical address, email address, phone number, fax number, etc.
- Payment information. We utilize a third-party credit card payment processor and therefore in those circumstances will not be storing your credit card information.
- Browsing history, search history and interactions with the Registry and BASR website.

3.2 Registry Information

Registry Information refers to the legal documents and information that forms part of the Registry and is a matter of public record, and therefore the *Privacy Act* and the *Access to Information Act* do not apply to Registry Information.

The Act and Regulations that govern the Bank Act Security Registry prescribe that certain information be collected and stored in the Registry in order to effect a registration. The primary purpose for the collection of this information is to comply with the Act and Regulations and therefore facilitate the operation of a Registry that is searchable by the public.

3.3 Registry operations and administrative information

We may collect other Registry related information from time to time, to support the administration of the Registry. This information may include records of communication sent by Users and the contents of those messages, such as letters, email, or other correspondence.

4 Consent

By submitting personal information to us you agree that we may collect, use, and disclose such personal information in accordance with this Policy and as permitted or required by law. You may refuse or withdraw your consent to use or disclose your personal information at any time by contacting Our Privacy Officer whose contact information is provided in section 11 of this Policy. If you refuse or withdraw your consent, we may not be able to provide you with services or information which may be of value to you.

Our servers are located in Canada where your information will be securely stored. By providing us with personal Information, you acknowledge and agree that your personal information may be transferred within Canada for processing and storage.

5 Purpose for collection

We collect personal information for purposes directly related to the proper functioning of the Registry and as required to comply with the *Bank Act*. We will identify the purpose for which Personal Information is collected at the time or before the information is collected. The primary purposes for which personal information is collected by the Registry is to:

- a) Facilitate the operation and administration of the Registry.
- b) Respond to inquiries and requests for services; and
- c) Process payment for services.

6 Limiting collection, use and disclosure of personal information.

The collection of personal information is limited to what is necessary for the proper functioning of the Registry and compliance with the Act and Regulations.

We only use personal information or disclose it to third parties for the purpose for which the information was originally obtained, for a use consistent with that purpose or for a purpose permitted by law. We may use your personal information for the following purposes, including:

- To identify you.
- To protect you against error or fraud.
- To open, service, process and maintain your account and respond to your requests.
- For billing and accounting purposes.
- To comply with any legal and regulatory requirements.

Consent must be obtained before your personal information is used or disclosed for any other purpose.

6.1.1 To whom do we disclose your personal information?

Your information is subject to disclosure to the Bank of Canada who has control and authority over the Records and Personal Information in possession of the Company.

We will provide your personal information to our service providers who help us fulfil the purpose for which your personal information was collected. Any disclosure to third parties will be done pursuant to the agreements setting out the requirements for use, safeguarding, retention, and disposal of the information, or as required by law.

7 Safeguarding Personal Information

Personal information, whatever its form, is classified according to the sensitivity of the information and is protected from unauthorised access, use, disclosure, removal, alteration and destruction in accordance with the applicable privacy laws, our security policies and contractual obligations with the Bank of Canada.

8 Retention of Personal Information

Your personal information will be retained to comply with all legal obligations and in accordance with the BASR Records Retention and Destruction policies.

9 Your Rights

9.1 Access to Information

Under the federal *Privacy Act*, you have the right to access the personal information we hold about you and to receive a general account of our uses of that personal information. For information on how to submit an access to information request go to the Bank of Canada Access to Information and Privacy site by clicking on this link: <https://www.bankofcanada.ca/about/contact-information/atip/>.

9.2 Request Correction

If the personal information in your customer account is inaccurate or incomplete, you may request an amendment. You may contact us by email at ask@basr.ca to request an amendment to your personal information.

10 Contact Information

Questions about access to information or privacy may be directed to the Bank of Canada by email at ATIP-AIPRP@bankofcanada.ca; or you may visit their Access to Information and Privacy website by clicking on this link <https://www.bankofcanada.ca/about/contact-information/atip/>

Questions about this Privacy Policy may be directed to our Privacy Officer by email at privacy@basr.ca.