



## PRIVACY CODE

RFA Bank of Canada and its affiliated entities (collectively referred to as “RFA”, “we”, “us”, “our” throughout) are committed to keeping your personal information accurate, confidential, secure and private. RFA has developed this Privacy Code to outline the principles we will use to govern the collection, use and disclosure of personal information in a manner that recognizes your right of privacy with respect to your personal information, and the need of RFA to collect, use, or disclose personal information for its business purposes.

### What Is Personal Information?

Personal information means personal, financial and other details about you that you provide to us and we obtain from others within or outside our organization, including through the products and services you use. This information includes, but is not limited to, your name, residential address, date of birth, identification (such as social insurance number), income, assets and liabilities and credit history.

### Why Do We Ask for Your Personal Information?

There are a variety of reasons why we collect and use your personal information. When you apply for, or provide a guarantee in respect of, any of our financial products or services and while you are our customer, you agree that we may collect your information in order (among other things set out in the Privacy Policy):

- to verify your identity and protect against fraud
- to understand your financial service needs
- to determine the suitability of our products and services for you
- to determine your eligibility for our products and services
- to inform you about other products and services that may meet your needs
- to provide ongoing service
- to comply with legal, regulatory and contractual requirements

### Refusing or Withdrawing Consent

Subject to legal, regulatory and contractual requirements, you can refuse to consent to our collection, use or disclosure of information about you. Depending on the circumstances, however, withdrawal of your consent may prevent us from providing you or continuing to provide you with products, services or information that may be of value to you.

### Ten Principles

There are ten principles that govern our privacy code.

#### 1. Accountability



RFA is responsible for all personal information in its possession, custody or control, including the information we share with our third-party service providers during the course of our day-to-day operations. RFA has designated a Chief Privacy Officer, who oversees the implementation of our Privacy Code. To contact the Office of the Chief Privacy Officer, please see the “Contact Us” section below.

## **2. Identifying Purposes**

RFA will identify and document the purposes for collecting your personal information at or before the time it is collected.

## **3. Consent**

RFA will make a reasonable effort to make sure you understand why you are providing us with personal information and what we can or will do with that information. Your consent can be expressed, implied or given through an authorized representative. You may also withdraw consent at any time, with certain exceptions. We may collect, use and disclose your personal information without your consent in limited cases as permitted by applicable law.

## **4. Limits on the Collection of Personal Information**

RFA will not collect personal information indiscriminately. Both the amount and the type of information collected shall be limited to that which is reasonably necessary to fulfill the purposes identified. Information shall be collected by fair and lawful means.

## **5. Limits on the Use, Disclosure, and Retention of Personal Information**

RFA will use or disclose your personal information only for the reasons it was collected and for which you have provided your consent. Disclosure involves providing specific information about you from our records to a third party. If a new purpose is developed in the future we will notify you and request your consent to use and disclose your information for this new purpose. We will keep personal information as long as necessary to fulfill the identified purposes, or such longer period as may be required by law, even if you cease to be a customer.

Over time, RFA may sell parts of its business, acquire new businesses or enter into other types of corporate transactions with third parties. As part of a sale transaction, your personal information would be one of the transferred assets to be disclosed to the purchaser. In other corporate transactions, your personal information may or may not be required to be transferred or disclosed to the other party or parties. Where it is necessary for us to disclose or transfer your personal information to either a purchaser or another party to a transaction and their professional advisors, we will ensure that the personal information continues to be subject to strict confidentiality and security obligations and that the information is only used for the purposes for which you have provided your consent.

Occasionally we may choose to store or process your personal information in countries other than Canada. Please note that our privacy obligations continue to apply to this information, even when it is located in other countries. However, as is the case in Canada, in some cases, government authorities may be able to access this personal information as permitted by applicable law of those countries.



## **6. Ensuring Accuracy**

RFA will make every effort to keep your personal information accurate, complete and relevant for its intended uses. You may, in writing, request access to your personal information to verify its accuracy and completeness and request that it be amended as appropriate. To access your personal information, please contact the Office of the Chief Privacy Officer.

## **7. Keeping your Information Secure**

RFA will safeguard the privacy of personal information through organizational, physical and technological security measures appropriate to the sensitivity of the information and protect the personal information from loss, theft, unauthorized access, disclosure, copying, use or modification.

## **8. Openness**

RFA makes information about our policies and procedures available to customers in simple formats that are easily understood. Please contact the Office of the Chief Privacy Officer if you have any questions regarding our policies and procedures.

## **9. Individual Access**

RFA will, upon written request, inform you about the existence, use and disclosure of your personal information. We will provide the information in a timely manner. We will provide you with access to your information, except in certain circumstances. If we deny your request, we will explain the reason for the lack of access to your personal information. You may then challenge our decision. Depending on the extent of the request, a minimal charge may apply which will be disclosed to you before the information search is undertaken.

## **10. Dealing with your Concerns and Questions**

RFA will respond to your questions, concerns and complaints about the privacy of your personal information in a timely manner. Any individual who has questions or concerns about privacy can direct them to the Office of the Chief Privacy Officer as set out in the contact section below.

## **Contact Us**

The security and confidentiality of your personal information is a high priority for RFA. We hope that this Privacy Code is informative and useful to you. If you have any concerns regarding this Privacy Code or have any further questions, you may bring them to our attention as follows:

### **Office of the Chief Privacy Officer**

RFA Bank of Canada  
Suite 2401, 1 Yonge Street  
Toronto, Ontario  
M5E 1E5  
Email: [cpo@streetcapital.ca](mailto:cpo@streetcapital.ca)



If your concern remains unresolved by the Office of the Chief Privacy Officer, you may contact the Office of the Privacy Commissioner of Canada (OPC). The OPC oversees compliance with the Personal Information Protection and Electronic Documents Act (PIPEDA), Canada's private sector privacy law. You have the right to complain at any time to the OPC about any alleged mishandling of your personal information under PIPEDA.

**Office of the Privacy Commissioner of Canada**

3rd Floor, Place de Ville  
112 Kent Street  
Ottawa, Ontario K1A 1H3  
Call: 1-800-282-1376  
Visit: [www.priv.gc.ca](http://www.priv.gc.ca)