

At Manulife Bank¹, we respect your privacy

Collecting and using personal information is necessary to our business as a financial services provider. Protecting your personal information and respecting your privacy is important to us. As a member of the Manulife group of companies², we take this responsibility very seriously.

We might change this Policy from time to time, but the most current version is always posted here on our website. The last time we updated the Policy was **July, 2018**.

To earn your trust, we follow **ten privacy principles**. The principles are based on the federal government's *Personal Information Protection and Electronic Documents Act*. In addition to the Privacy Policy, we have our [Online Privacy Statement](#) and our [Statement of Voiceprint Password Privacy](#). Combined, these statements define our commitment to managing your personal information carefully.

Ten Privacy Principles

1. Accountability We are responsible for the personal information under our control. We have specific people who make sure that we stay compliant with the privacy principles.

Learn more

Our Privacy Officer oversees our privacy program, designed to build and maintain trust in our information-handling practices. Protecting the personal information you share with us is vital to our business.

2. Identifying purposes We explain why we collect the personal information we ask for. When we authorize other parties to collect information on our behalf, they do the same.

Learn more about how we use your personal information

What do we use your personal information for?

- Maintaining our relationship with you
- Managing the products and services we provide
- Confirming your identity and the accuracy of your information
- Evaluating applications and administering the products and services we provide
- Complying with legal requirements, such as provincial and federal tax reporting, anti-money laundering, and unclaimed property obligations
- Support and maintain the accuracy and integrity of the credit reporting system, which includes your past credit and repayment history and other financial transactions
- Protecting you and us from errors, misrepresentations, fraud, and/or contravention of laws or criminal activity
- Understanding you and how you like to do business with us
- Analyzing data to help us make decisions and improve the products and services we offer

¹ Reference to Manulife Bank of Canada applies to ("Manulife Bank" or "the Bank") and its wholly owned subsidiary, Manulife Trust Company ("MTC" or the "Trust Company"). Unless specifically mentioned otherwise, all references to the Bank include its subsidiary, MTC.

² In this Policy, we, us and our mean The Manulife Bank of Canada and affiliated companies including The Manufacturers Life Insurance Company ("Manulife") – Canadian Division operations, Manulife Securities Inc., Manulife Securities Investment Services Inc., Manulife Securities Insurance Inc., Manulife Asset Management Limited, Manulife Assurance Company of Canada, First North American Insurance Company, and affiliates of these entities. You and your mean individuals whose personal information we are collecting, using and disclosing.

- Determining if there are other products or services you might be interested in, if you are eligible for those products, and sending you details about them

We may analyze how you use our products and services, including through our websites and other electronic means. This might include your preferences for certain products, demographics, interests and lifestyle activities. If we know this information, we can offer products and services that are more relevant to you.

With this information, we might recommend another Manulife Bank service or product to you. You can ask to be removed from our marketing lists at any time. [Click here](#) for more information.

Learn more about how we use your SIN

- There are many reasons why we ask for your Social Insurance Number (SIN). Your SIN is required by law for tax-reporting requirements.
- With your consent, we use your SIN as a unique identifier to keep your information separate from other customers and people with similar names. For example, if we need to verify your credit history, we use your SIN to confirm that the credit information we ask for and receive is about you and not someone with the same or similar name.
- You can request that we not use your SIN unless we are required to by law.

3. Consent We need your permission to collect, use, and disclose personal information, with some exceptions. The exceptions are determined by law and can include times where legal, medical, or security reasons make it impossible or impractical to seek consent. You can give consent in writing, as well as verbally, electronically, or through authorized representatives. In certain circumstances, it's also implied.

Learn more about consent

- Your consent may be given in writing, verbally, electronically, or through authorized representative(s), such as your financial advisor.
- Your consent is also implied or inferred from certain actions. For example, if you present your driver's license as identification to your advisor, it is understood that you are giving your consent to your advisor to provide us with your driver's license reference number to be kept in our files. Or implied consent may be obtained through your use of a product, or when you approach us to obtain information, inquire about or apply for products or services.
- You may withhold or withdraw your consent if there are no legal or contractual reasons to stop you. In some cases, withdrawing your consent impacts our ability to provide you with products and services. [Click here for more details.](#)

4. Limiting collection We only collect your personal information in fair and legal ways. The information we collect is limited to **identified purposes**.

Learn more about the information we collect

Depending on the product or service, we collect specific personal information about you, including:

- Your name, address, telephone number(s), email address, birth date, occupation, driver's license number, passport number, Social Insurance Number (SIN), or other identifying information
- Information about how you use our products and services, including through our websites and other electronic means, and your preferences for certain products, demographics, interests and lifestyle activities.

- Personal information we need to manage our business relationship with you
- Depending on the device you use or the method you use to interact with us, we may automatically collect digital information about your device, your location, and your use of our site. Please see our [Online Privacy Statement](#) for more information about how we collect, store and use information electronically.

We only collect the information we need. The type of personal information we gather depends on the type of product or service involved. We might need different information for banking products than we need for insurance or investment products.

We might collect financial information, such as your place of employment, annual income, assets, and liabilities.

If you're interested in investments or financial advice, we might ask for information about your financial goals and your retirement plans.

Learn more about where we collect your personal information from

We collect personal information from:

- Completed applications and forms
- Your interactions with us
- Other sources that might include:
 - Your advisor or authorized representative(s)
 - Third parties we work with to issue and manage our products and services, whether now or in the future
 - Third parties you allow to share information with us or third party accounts you allow us to access
 - Public sources, such as government agencies and websites
- We might collect your personal information through public sources like websites or third-party service providers. With your consent, we sometimes ask independent sources to verify or provide additional information. Examples of these sources include service providers we use, other banks or financial institutions, your employer, and credit reporting agencies.
- If your information is collected over the phone, the call might be recorded or monitored to:
 - Establish a record of the information you provide
 - Take or verify instructions from you
 - Confirm your identity
 - Maintain quality service levels
 - Help with staff training

If you don't want your calls recorded, you can communicate with us in writing instead. You can also request that we respond to you in writing only.

5. Limiting use, disclosure, and retention We only use or disclose your personal information for the reasons it's collected. We use it for other purposes you consent to, or when it is required or allowed by law. We keep the information only for as long as we need to, or as required or allowed by law.

Learn more about how we disclose your information

Depending on the product or service, we disclose your personal information to:

- People, financial institutions, affiliate, and other parties we work with to administer the products and services we provide
- Authorized employees, agents, and representatives who need the information to complete their duties for us
- Your advisor and any agency we work with that has direct or indirect supervisory authority over your advisor, and their employees
- Any person or organization you give consent to
- People who are legally authorized to view your personal information
- Other institutions that may have granted you credit, credit bureaus and personal information agents with respect to your credit or financial history
- Service providers who need this information to perform their services for us. Examples of the services include: data processing, programming, data storage, market research, printing and distribution services, and investigative agencies.
- People, organizations, and investigative bodies in order to prevent, detect or suppress financial abuse, fraud, criminal activity, to protect our assets and interests and assist us with any internal or external investigation into potentially illegal or suspicious activity, breaches of agreement, or contravention of law.

In some cases, we provide your personal information to people, organizations, and service providers in provinces or jurisdictions outside Canada. They are therefore subject to the laws of those provinces or jurisdictions.

When we share personal information with our service providers, they must protect it in ways that are consistent with our privacy policies and practices.

Learn more about how we use service providers

Generally, your personal information is limited to those who need it and have a right to it. We use service providers for various services, including: debit and credit card services, printing, mail distribution, information technology (IT), data storage, administration, marketing, market research, promotions, and investigation.

Learn more about how long we retain your information

We keep your information for one of the following time periods, whichever is longer:

- As long as we are required by law and guidelines set for the financial services industry
- As long as we need to for managing the products and services we provide you

The types of products and services we offer require us to keep your information for extended periods of time. When personal information isn't needed anymore, it is destroyed, erased, or made anonymous.

6. Accuracy Any personal information that we collect, use, or disclose should be as correct, complete, and up-to-date as possible for the reasons it is used.

If your contact information changes, please contact us right away.

We make all reasonable efforts to make sure that the personal information we collect and keep in your file is as correct, complete, and up-to-date as it needs to be for the identified purposes.

We will rely on you to give us accurate information and to let us know about any changes, such as changes to your contact information.

7. Safeguards To protect your personal information from intrusion, release, or misuse, we use security safeguards that match the sensitivity level of the information.

Manulife Bank commits to protecting your personal information from unauthorized access and use. We use physical, organizational, and technological safeguards that are appropriate for sensitivity of the information.

Personal information is protected:

- Physically, by building security measures and physical barriers
- Organizationally, by our policies, procedures, and access levels
- Technologically, by using passwords, encryption, firewalls, anti-virus, and anonymizing software

Learn more about how we safeguard your information

- All employees and contract employees get information protection and ethics training every year. We commit to being open with you about how we handle your personal information.
- We have a robust information security program. Our privacy and information security staff work together to help ensure your personal information is protected by the right safeguards.
- We may de-identify. De-identifying ends the connection between the information and your identity to protect it when the information has served the purpose it was kept for.

8. Openness We make information about our privacy policies and how we manage your personal information available to you.

9. Individual access If you send us a request in writing, we tell you what personal information about you we have, and how we use and disclose it. We give you access to the information, with certain exceptions allowed by law. You may verify the accuracy and completeness of your information and request changes, if appropriate.

Learn more about accessing your information

You have the right to access and verify the personal information we keep in our files. You may also request corrections to information, if appropriate.

Depending on the circumstances, we can't always give you access to all the information. There might be a charge for the personal information you request. If this happens, we let you know.

Please contact the Privacy Officer at the address below for more information.

10. Inquiries and concerns Contact us if you have any questions or concerns about our privacy policies and practices.

Send a written request to the Privacy Officer at the address listed below if you:

- Have any questions or concerns
- Want more information about who has access to your information
- Want to know more about our privacy policies and procedures
- Want to review your personal information in our files

Withdrawing your consent

You may withdraw your consent for us to use your SIN or Business Number for non-tax administration purposes.

Unless allowed by law, you may not withdraw your consent for us to collect, use, keep, or disclose the personal information we need to issue or manage the product and services you use or apply for. We may treat your withdrawal of consent as a request to terminate the product or service.

You may withdraw your consent for us to send you offers for services or products, except for items that we mail with your statements.

Learn more about offers

- Some of our business areas or third parties offer or promote other products and services that we think you might have interest in. These offers or promotions are printed or provided by electronic means.
- We will share your personal information with our affiliates and select third parties to promote other products and services if you consent or if the law allows it.
- We do NOT give your personal information to any organization outside of our affiliates and third parties to let them market their own products or services to you without your consent.

Print marketing

If you don't want to receive our marketing or promotions by mail, you may opt-out. Contact us to remove your name from our mailing lists. After you're removed from our mailing lists, you aren't eligible to receive addressed, direct mail offers.

When you opt-out, you still receive information from Manulife Bank, including:

- Information about Manulife Bank products or services you have with us that comes in or with your statements
- General product and service updates or information comes in or with your statements
- Electronic marketing and telephone marketing, unless you specify otherwise

When you contact us to remove your name and address from our marketing mailing lists, we use all reasonable efforts and do our best to remove you in a timely manner.

Telephone marketing

If you don't want to receive our marketing or promotions by telephone, you may opt-out. Contact us to remove your name from our calling lists.

When you opt-out, you still receive information from Manulife Bank, including:

- Information about Manulife Bank products or services you have with us that comes in or with your statements
- General product and service updates or information comes in or with your statements
- Electronic marketing and mail marketing, unless you specify otherwise

When you contact us to remove your name and phone number from our marketing calling lists, we use all reasonable efforts and do our best to remove you in a timely manner.

Electronic marketing

We need your consent to send you offers or promotions by electronic means, such as email. As our customer, we have your implied consent to send you electronic messages under Canada's Anti-Spam Legislation, unless you tell us otherwise. You can notify us by using the **unsubscribe** option included in the email we send you, where applicable.

We remove your name from our electronic mailing lists within ten (10) business days of your request. You still receive electronic communications about the products and services that you have with us.

Contact us

If you want to withdraw your consent, phone our Contact Centre, or write to the Privacy Officer at the address below.

Mail

Chief Privacy Officer
Manulife Bank of Canada
500 King Street North
P.O. Box 1602
Waterloo, Ontario N2J 4C6

Telephone

1-877-765-2265