



## Privacy Statement

Canada is part of a global economy based on the creation, processing, and exchange of information. The technology underlying the information economy provides a number of benefits that improve the quality of the protection of privacy rights and the individual's right to control the use and exchange of personal information.

The Swan Valley Credit Union is a member-owned and controlled financial institution and, as such, has an inherent responsibility to be open and accessible while, at the same time, demonstrating the greatest respect for protection of the member's personal privacy.

In adopting this Credit Union Code for the Protection of Personal Information, what has been accepted practice becomes a documented commitment to the member.

Protecting the personal information we collect and maintain is as important to us as it is to you. Like any organization, we require a certain amount of personal information to conduct business and provide you with the products and services you want and need. At the same time, you have the right to know that your privacy is being respected and that your confidential information is collected, used and protected appropriately.

The product or service we are providing you, requires your name, address and some identification. We only collect the information we need and only use it for the purpose explained to you.

**Birthdate** – This is to ensure your identity and that no one is trying to impersonate you. This information may also be used to determine your eligibility for a product or service.

**Social Insurance Number (SIN)** – This information is required for products which earn investment income. We may also use it to keep your information separate from other members with a similar name.

**Financial Information** – This information is used to assess your eligibility for credit products, including loans.

**Health Information** – This information is required for some insurance products to determine eligibility.

*Canada's privacy legislation sets out 10 principles which have been adopted by Swan Valley Credit Union.*

- 1. Accountability** – The knowledge and consent of the member are required for the collection, use, or disclosure of personal information.
- 2. Identifying Purposes** – The purposes for which personal information is collected shall be identified by the credit union at or before the time the information is collected.
- 3. Consent** – The knowledge and consent of the member are required for the collection, use and disclosure of personal information, except in specific circumstances as described within this Code.

- 4. Limiting Collection** – The collection of personal information shall be limited to that which is necessary for the purposes identified by the credit union. Information shall be collected by fair and lawful means.
- 5. Limiting Use, Disclosure and Retention** – Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the member or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.
- 6. Accuracy** – Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.
- 7. Safeguards** – Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.
- 8. Openness** – The credit union shall make readily available to members specific, understandable information about its policies and practices relating to the management of personal information.
- 9. Individual Access** – Upon request, a member shall be informed of the existence, use, and disclosure of their personal information, and shall be given access to that information. A member is entitled to question the accuracy and completeness of the information and have it amended as appropriate.
- 10. Challenging Compliance** – A member shall be able to question compliance with the above principles to the Privacy Officer accountable for the credit union’s compliance. The credit union shall have policies and procedures to respond to the member’s questions and concerns.

#### **Information we collect on our website**

You can visit all public areas of our website without providing any personal information about yourself. Our website collects only non-personal information based on a visitor’s Internet Protocol (IP) address (this is not personally identifiable). Information collected includes the date and time of visit, the type of Internet browser used to access the site, the referring address (the link a visitor uses to access the site). This data is used to create statistics on site usage and improve online services.

If you send us an email, any information provided by you will only be used for the purposes of responding to your inquiry or acting on your request. We will not use your name or email addresses for any other purposes without additional consent.

#### **Links to Other Web sites**

Our website contains links to other websites that are part of, affiliated with, or have a business relationship with Swan Valley Credit Union. When you leave our site to visit one of these other sites, the only information transferred to the new site is the fact you came from the Swan Valley Credit Union web site (the referring address). Transmission of the referring address allows other sites to monitor their own web traffic, but does not disclose any personal information about you.

#### **Mobile Apps**

The following list of permissions and activities are required by our mobile app to operate.

These include:

- “Access Camera” permission is used by the app to deposit a cheque via mobile deposit capture, store a custom profile picture and background.
- “Access Location” permission is used by the app to accurately locate the nearest ATM or branch in the “Find Us” feature.

- “Call Permission” is used to automatically call the user’s preferred branch by tapping on the phone number in the “Find Us” feature.
- “Read Contacts” permission is used to set up new *Interac* e-Transfer® contacts and send an *Interac* e-Transfer®. Only the device contact information a user confirms is readable by *Interac*.
- “Internal Storage” permission is required to view, share and download PDF files from the mobile app to a user’s device.
- “App Activities” uses mobile app interaction data for analytics on usage and crash information for the current app version. We also monitor application stability using the crash logs to make ongoing improvements. Data collected on app activities, information and performance is completely anonymous and aggregated – individual users are not identifiable.

### **How do I contact Swan Valley Credit Union with Questions or Concerns?**

We welcome any questions or concerns about our Internet Privacy Statement, or the practices of the site. Please contact us by email or in writing at the following address.

Privacy Officer  
Swan Valley Credit Union Ltd  
Box 1510  
Swan River, MB  
R0L 1Z0

Email: [privacy@svcu.mb.ca](mailto:privacy@svcu.mb.ca)

Subject: ATTENTION: SWAN VALLEY CREDIT UNION PRIVACY OFFICER

We will respond to your request within 30 days, from the date the letter was received by the Privacy Officer. If there are any costs associated with information gathering, we will notify you in advance.

### **Notice:**

Swan Valley Credit Union reserves the right to amend its Internet Privacy Statement and its Privacy Code at any time with or without notice. Please check this page periodically for changes.

(last updated: October 6, 2022)