

Revised: January 2025

## 1. Introduction

Meridian Credit Union's Privacy Statement (the "Privacy Statement") outlines how our organization (referred to as "Meridian", "we", "us" and "our") apply privacy principles – such as limiting collection, use, and retention – to the Personal Information we collect from you during your interactions with us.

Privacy laws in Canada define "Personal Information" as any factual or subjective information, recorded or not, about an identifiable individual. Personal Information does not include business contact information, including a business person's name, title, or email address.

The words "you" and "your," when used in the Privacy Statement, refer to anyone who applies for, or uses, any product or service we offer.

You may receive other agreements that pertain to a specific Meridian product or service when you sign up for, or use, them. You must read all agreements that apply to the product(s)/service(s) you have agreed to receive from us in addition to this Privacy Statement. This includes, but is not limited to, your Meridian Membership agreement, account agreements, and/or electronic services agreement(s) (the "Agreements").

## 2. Accountability

Meridian is committed to protecting your privacy. We follow regulatory requirements and industry best practices in everything we do to support that commitment to you. Our Privacy Officer leads the way in privacy governance, but all our employees must adhere to Meridian's policies and procedures.

### 2.1 Changes to the Privacy Statement

This Privacy Statement replaces any earlier Privacy Statements published by Meridian.

**NOTE:** We may update or replace this Privacy Statement at any time to ensure that it accurately reflects how we collect, use, disclose, and transfer your Personal Information.

We may let you know of significant changes to this Privacy Statement in the following ways:

- A notice on the Website, and
- A notice in our branches, or
- A message or notification shared through our online banking or mobile application.

By continuing your Membership with us and using our products and services you agree and accept the updated terms of the Privacy Statement. This includes keeping the financial products you already have with us after we post a notice of changes on our website. If you do not accept the Privacy Statement, please contact us directly to express your concerns. If we cannot resolve your concerns, we may need to:

- Terminate your Membership, as specified in our by-laws, and/or
- Close your product(s), and/or
- Not allow your continued use of our services (as permitted and subject to applicable penalties).

### 3. Purposes for collecting your Personal Information

Meridian collects, uses, discloses, and transfers your Personal Information, on its own or along with other information, to:

1. Provide you with information, products, or services that you request from us
2. Fulfill the purposes that we described for which you initially provided your Personal Information
3. Provide optional insurance products or services
4. Communicate with you about ongoing services and provide you with important notices
5. Validate your identity and authenticate you (and/or your devices), each time you interact with us
6. Fulfill our obligations and enforce our rights arising from any contracts with you, including for collection of information or to abide by applicable laws and regulations
7. Follow legal requirements for tax reporting and anti-money laundering
8. Prevent and detect fraud and support information security
9. Process applications and confirm your suitability for Membership, products, and services
10. Manage and administer your products and services
11. Design or offer suitable products and services
12. Assess your eligibility for credit, to collect debts, and to ensure credit reporting accuracy
13. Provide you with personalized information on products, services, and other communications. This includes customizing your experience on our website and mobile application, and sending you relevant offers via email, phone, Short Message Service (“SMS”), or social media.  
**NOTE:** You can opt out of marketing communications at any time
14. Manage your participation in our contests, surveys, or promotions
15. Communicate with other financial institutions and service providers according to the instructions you have given to us
16. Conduct satisfaction surveys and other research to improve our services
17. Discover trends in the use of our products and services, and continuously improve how we interact with Members
18. Track website usage, as well as enhance our services to you by using cookies. You can review the [Meridian Cookie Policy](#)

19. Help manage and assess our risks, operations, and relationship with you
20. Meet legal and regulatory requirements

## 4. Disclosing your Personal Information

We may share your Personal Information that we collect, or you provide, as described in this Privacy Statement to:

1. Our subsidiaries and affiliates to fulfill the purpose for which you provided it
2. Service providers, financial institutions, affiliates, and other third parties we work with to administer the products and services we provide
3. Third-party insurance providers, specifically with respect to your health information
4. Authorized employees, agents, and representatives who need the information to complete their duties for us, including collecting a debt owed to us, detecting, or suppressing fraud, or preventing fraud that is likely to be committed
5. Groups that are legally authorized to access your Personal Information as required by law
6. Other institutions that may have granted you credit, credit bureaus, and other agents with respect to your credit or financial history
7. Organizations and investigative bodies in effort to prevent, detect, investigate, or reduce financial abuse, fraud, and criminal activity, and to protect our assets and interests, and help us with any internal or external investigation into potentially illegal or suspicious activity, breaches of agreement, or contravention of law
8. A buyer or other successor in case of a merger, reorganization, sale, or transfer of some or all of Meridian's assets, in which Personal Information held by us about our Members is among the assets transferred, in accordance with applicable law
9. Execute on any court order, law, or legal process, including to respond to any government or regulatory request in accordance with applicable law

## 5. Transferring your Personal Information

We may transfer your Personal Information to contractors, service providers, and other third parties ("Service Providers") we use to support our business (including data processors and data storage facilities). We take measures to protect your Personal Information within any contract or apply other applicable safeguards.

We may also process, store, and transfer your Personal Information in and to a foreign country. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of the foreign country may be able to obtain access to your Personal Information through the laws of the foreign country. By using our products or services, you consent to the transfer of Personal Information to countries outside of Canada, including the United States.

## 6. Consent

You may give your consent, allowing us to collect, use, disclose, and transfer your Personal Information, to us in writing, verbally, or electronically. We may also rely upon implied consent from your actions, such as you inputting your Personal Information into a contact form or application.

Unless allowed by law, you may not withdraw your consent for us to collect, use, keep, or disclose the Personal Information we obtain to issue or manage the products and services that you apply for or use.

## 7. Limiting collection and use

You may ask that we limit the collection of your Personal Information in the ways described in the Purposes section above at any time by contacting the Contact Centre at 1 (866) 592-2226.

Meridian only asks for necessary Personal Information. We will let you know when requested information is optional and follow our Privacy Statement for how we manage any information you provide us.

The Personal Information that we collect from you may include things like:

1. General information such as your name, address, telephone number(s), email address, birth date, occupation and employer, Social Insurance Number (“SIN”), a copy of government-issued photo identification used to verify your identity, or other identifying information
2. Financial information such as income, assets, liabilities, transaction history, payment history, account numbers, and tenure with us and with other financial institutions
3. Technological information including Internet Protocol (“IP”) address, device identifiers, biometric information, behavioural information, geolocation, and photos/videos you share with us
4. Information on associated individuals such as references, beneficiaries, power(s) of attorney, executors, representatives, lawyers, and parties to contract(s)
5. Communications with Meridian, including recordings of telephone calls, electronic communications, copies of written instruction(s), and video recordings from in and around our physical premises and automated banking machines (“ABMs”)
6. Other information such as personal preferences about the product(s)/service(s) you use

### 7.1 Personal Information from other sources

We might get information about you from other sources or provide information to them about you, following the law. These sources may include, but are not limited to, the following:

1. Government and law enforcement agencies and registries
2. Public records (i.e., bankruptcy or judicial cases)
3. Consumer credit reporting agencies
4. Other financial or lending institutions
5. Fraud prevention agencies, investigators, and/or other organizations whose purpose is to detect or prevent fraud
6. Background check databases and other registries to confirm information you have provided us and offer a holistic view of borrower(s)
7. Payment card networks, processors, and service providers

8. Merchants or dealers involved in the sale of property to you that Meridian is financing
9. Any person who has the legal authority to act on your behalf
10. Service providers that we engage with to understand and serve you better

## 8. Limiting use and retention

We may on occasion remove your identity from your Personal Information for research and/or statistical reporting purposes. Those reports will not allow for your identification. We reserve the right to use such anonymous data for any legitimate business purpose without your consent or without further notice to you.

Meridian will only retain your Personal Information for as long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

## 9. Accuracy

To ensure that your Personal Information is up to date we may ask that you review and confirm that the information we have about you stays correct, as required by applicable laws. If you wish to view your file or make corrections to the Personal Information that we have currently, you may do so by sending a written request to the Meridian Privacy Office at the address noted at the end of the Privacy Statement.

### 9.1 Automated decision making

We may use technology to help amplify your Member experience. This includes automated decision systems that can quickly evaluate your application for products/services offered and help prevent fraud or other financial crimes from occurring.

**NOTE:** These automated decision systems do not replace your ability to work directly with Meridian representatives. If you have any questions about how we decision your application, please contact us. You can ask that we review any decision through a manual process.

## 10. Safeguards

The security of your Personal Information is especially important to us. Once your data is within Meridian's environment, we use industry-standard physical, technological, and organizational safeguards to protect data. The internet is not completely secure and therefore we cannot guarantee the security of your Personal Information transmitted by you to us, over an unsecured online network.

The safety and security of your information also depends on you. In cases where we have given you (or where you have chosen) a password or Personal Identification Number ("PIN") to access your services with us, you must keep this information confidential. You must also keep this information confidential and not share it with anyone.

Meridian protects your Personal Information:

- 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

## 11. Individual access

Upon request, we will provide you access to the Personal Information you have provided to us. This information will typically be visible in your transaction records, which you can access through the Meridian mobile application, online banking, or your statements. If you are unable to find what you are looking for, you can send a written access to information request form to the Meridian Privacy Officer at [PrivacyOffice@MeridianCU.ca](mailto:PrivacyOffice@MeridianCU.ca). If we require a charge to complete the search, we will let you know in advance. We will respond to your request within 30 calendar days of receiving it.

If the information you have requested holds references to other individuals, is subject to legal privilege, or has proprietary or other information that is protected by law, we will provide you with the rationale for declining your request for those items, when appropriate.

## 12. Have a privacy concern?

Meridian is committed to providing you with the best Member experience that we can.

If you have a privacy concern or access to information request, you can discuss, and escalate if needed, in the following ways.

### Talk to your branch, Wealth, or Business Banking representative

<b>Website:</b>	Use the <a href="#">Contact Us</a> option
<b>Branch:</b>	Call or visit your home branch directly. You can find branch contact information with our <a href="#">Branch Locator</a> .

### Get in touch with the Contact Centre

<b>Call Toll Free:</b>	1 (866) 592-2226 Select option 1
<b>Call International Collect:</b>	1 (416) 597-0165
<b>Email:</b>	<a href="mailto:MeridianContactCentre@MeridianCU.ca">MeridianContactCentre@MeridianCU.ca</a> or send a secure message through your online banking or the Meridian app.

### Contact the Privacy Officer

<b>Email:</b>	<a href="mailto:PrivacyOfficer@MeridianCU.ca">PrivacyOfficer@MeridianCU.ca</a>
<b>Mail:</b>	Meridian Credit Union ATTN: Privacy Office 75 Corporate Park Drive St. Catharines, ON L2S 3W3

**NOTE:** If corresponding by email, please do not include any confidential information or Personal Information as online security cannot be guaranteed.

## Contact the Office of the Privacy Commissioner (“OPC”)

The OPC oversees compliance with Canada’s privacy laws. You can contact them at any time with a privacy complaint, for more information, or if not satisfied after contacting Meridian’s Privacy Office.

### How to contact the OPC

<b>Call Toll Free:</b>	1 (800) 282-1376
<b>Online form:</b>	On the <a href="#">OPC website</a>
<b>Mail:</b>	Office of the Privacy Commissioner of Canada 30 Victoria Street Gatineau, Quebec K1A 1H3