

# Desjardins Business Privacy Policy

**At Desjardins Group, privacy is important. That's why we take the protection of your business information very seriously.**

Whether to serve business members and clients every day, support their growth or meet our legal obligations, we need to collect, use and disclose certain information.

This information is used to identify a business, assess business members' or clients' eligibility for requested products and services, offer products and services that meet their expectations, help them take advantage of available benefits and discounts, make personalized recommendations and offers based on their situation, and manage the risks associated with our activities. We also use this information to comply with our legal and regulatory obligations, which include the prevention of cyber threats, fraud and other financial crimes.

It's our responsibility to ensure that all the information we collect is handled **confidentially** and **securely**. This is the basis of our Privacy Policy and how we apply it. The Privacy Policy explains why we **collect** information about a business, how we **handle** it and how we **protect** it.

## Types of business information collected by Desjardins

We've compiled a table detailing all the information we may collect from our business members and clients. We've organized the business information into 10 categories and we've provided concrete examples for each category.\*

Categories	Examples
1. Business identification information	<ul style="list-style-type: none"><li>• Business name and address</li><li>• Contact persons' first and last names and business addresses</li><li>• Business number or Quebec enterprise number</li></ul>
2. Authentication information for designated and authorized persons	<ul style="list-style-type: none"><li>• Voice signature</li><li>• Answers to authentication questions</li></ul>
3. Information about our communications with the business	<ul style="list-style-type: none"><li>• Summary of appointments</li><li>• Log, history, recording and summary of communications with us</li><li>• Written communications by email or chat (including complaints and dissatisfactions where applicable)</li></ul>
4. Information about the use of our websites and applications	<ul style="list-style-type: none"><li>• Information collected through cookies</li><li>• Browsing preferences (language, province, etc.)</li><li>• Clickstream data and browsing history on our websites and apps</li><li>• IP address</li><li>• Information about your device, operating system or browser</li></ul>
5. Information about Desjardins products and services held by the business member or client	<ul style="list-style-type: none"><li>• Information on balances and deposits</li><li>• Information on transactions and operations</li><li>• Information on products held</li><li>• Authorized account signatories</li><li>• Insurance policy and claim numbers</li><li>• Insurance amount</li><li>• Insured property</li></ul>
6. Information about the business' financial situation	<ul style="list-style-type: none"><li>• Financial statements</li><li>• Business' credit rating and report</li></ul>
7. Information on communication choices and preferences	<ul style="list-style-type: none"><li>• Choices and preferences for how we communicate with the business</li></ul>

Categories	Examples
8. Other information to enable Desjardins Group to comply with its legal obligations	<ul style="list-style-type: none"> <li>• Taxpayer identification number</li> </ul>
9. Personal information on business related persons	<ul style="list-style-type: none"> <li>• First name, last name and contact details</li> <li>• Date of birth</li> <li>• Government-issued identification</li> <li>• Credit report</li> <li>• Personal balance sheet</li> </ul>
10. Personal information that the business holds about third parties to conduct its activities	<ul style="list-style-type: none"> <li>• Information about the business' clients</li> <li>• Personal information about the business' employees</li> <li>• Personal information about the business' guarantors (surety)</li> </ul>

\* These examples are provided for information purposes only and do not constitute an exhaustive list of the information that may be collected about the business.

## Collecting business information

Business information is collected **directly from the business' representatives** when they contact us for information or to obtain a new product or service on behalf of the business.

Depending on the situation, we may need to collect information about the business **from other individuals, organizations or entities**, such as credit rating agencies, or public sources like registries, official documents or websites.

## Transparency in our practices

**We use the information we have about the business to meet its day-to-day needs, to fulfill our legal obligations and to offer products and services based on its situation.** To carry out our day-to-day activities, we need to:

Activities	Examples
Identify the business	<ul style="list-style-type: none"> <li>• Confirm that we're providing products and services to the right party by verifying the business' identity</li> <li>• Ensure that the business' information is accurate, complete and up to date before we use it</li> </ul>
Assess the business' eligibility for requested products and services	<ul style="list-style-type: none"> <li>• Assess the business' financial situation</li> <li>• Reassess the business' financial obligations to us</li> <li>• Review and update the business' file or credit rating to assess and manage our risks</li> </ul>
Offer products and services that meet the business' expectations	<ul style="list-style-type: none"> <li>• Guide, advise and help the business make the best decisions based on its situation and goals</li> <li>• Design statistical models to deliver products, services and advice that meet the business' needs</li> <li>• Process the business' insurance claims</li> <li>• Get an opinion after the business' interaction with Desjardins Group or about a product or service</li> <li>• Provide guidance and support, respond to information requests about the business and refer the business to the right person based on its requests</li> <li>• Handle complaints and dissatisfactions</li> </ul>

Activities	Examples
Enable your business to take advantage of available benefits and discounts	<ul style="list-style-type: none"> <li>• Offer the business member or client discounts, cash back and special rates or fees, depending on the products and services they have with us</li> <li>• Determine the business member's eligibility, calculate and pay out their member dividend as a Desjardins caisse member based on the products and services they have with us</li> </ul>
Make personalized offers and recommendations	<ul style="list-style-type: none"> <li>• Provide the business with personalized products and services tailored to their needs, based on their company information and financial situation</li> <li>• Offer the business member new products or services from one of our components</li> <li>• Contact the business member to invite them to take part in consultations that are in line with their business reality and financial situation</li> </ul>
Manage the risks associated with our activities	<ul style="list-style-type: none"> <li>• Assess and monitor the performance of our products and services, price them, improve them, and create new ones</li> <li>• Develop, maintain and improve internal audit systems, processes, methods, practices and procedures</li> <li>• Design and build dashboards, indicators and other types of reports</li> <li>• Find, identify and assess risks to continuously improve our products and services</li> <li>• Process insurance claims, including for debt collection</li> </ul>
Prevent cyber threats, fraud and other financial crimes	<ul style="list-style-type: none"> <li>• Rapidly detect and prevent cyber threats, fraud, and other financial crimes</li> <li>• Design statistical models to facilitate detection and prevention, and take corrective measures as required</li> </ul>
Meet our legal obligations	<ul style="list-style-type: none"> <li>• Respond to requests, warrants and orders from courts and other organizations</li> <li>• Comply with tax requirements</li> </ul>

## Security measures put in place for the business' information

### Desjardins rigorously applies security measures to protect the information of its business members and clients.

We make sure that only authorized individuals can access this information by setting up access management systems based on need-to-know principles. These accesses are also protected by passwords, monitoring measures and controls to detect suspicious activities.

Desjardins also has a code of professional conduct with strict rules governing privacy. All of our employees and consultants are required to submit their annual certification for it. They must also complete regular training and follow security and privacy practices and procedures.

Our physical security measures include surveillance cameras, security guards and access card systems.

### Access to information

Access to business information is limited to Desjardins Group employees and consultants who need to access it to perform their duties.

### Sharing of business information

We may need to disclose business information to third parties in the normal course of business, to the extent that such disclosure is relevant to the purposes described above. For example, information may be shared with other Desjardins Group entities or with third parties, such as service providers, partners, other financial institutions, credit bureaus, public and private fraud and claims databases, lending institutions, organizations, authorities or courts.

### Retention of business information

Business information is usually stored in Canada, but we may use suppliers or partners located outside of the country. If we need to disclose information with these suppliers and partners, Desjardins Group will ask these suppliers and partners to contractually agree to comply with our security and confidentiality standards.

### Disposal of business information

We store business information in a secure and confidential manner for as long as it's required for us to meet our legal obligations. These time limits vary depending on

each situation. They must take into account the minimum retention periods required by law and the exhaustion of potential remedies and limitation periods. Business information is therefore kept after the business relationship with Desjardins has ended. Once the retention period has expired, we ensure that the information is deleted in a safe and secure manner, in accordance with applicable best practices.

## Business consent

**By giving consent, the authorized account signatory or authorized business representative authorizes Desjardins Group to collect, use and disclose the business' information to provide service on a daily basis and meet its legal obligations.** This consent will remain in effect for as long as the business maintains a business relationship with a Desjardins Group component.

If the business refuses to allow us to collect certain information, we may not be able to provide the product or service requested or certain benefits and discounts associated with that product or service.

## Personal information on business related persons

**When we offer products and services to the business, we may need to collect, use and disclose the personal information of related persons, but only to the extent that this information is necessary.** This information may concern the business' signatories, individuals who have direct or indirect ownership or control of the business, or its trustees, beneficiaries and settlors.

For example, personal information may be requested to authenticate related persons, confirm eligibility of the business' signatories to act in that capacity, assess the business' eligibility for the requested products and services, meet our legal obligations in terms of financial crime prevention and to prevent fraud, cyber threats and other financial crimes, and ensure sound risk management. We will only collect, use and disclose whatever personal information is necessary to meet these requirements.

## Personal information that the business holds about third parties to conduct its activities

**We may need to collect personal information that the business holds about third parties.** This could include information about the business' employees collected

when the business member or client subscribes to our payroll management services or information about its customers collected when the business uses our accounts receivable management platforms. We may also collect information about the business' guarantors (surety) if they guarantee one of our commitments with you.

Such information is subject to the same security and privacy measures that are applied to the personal information of all our members and clients. Because we place a great deal of importance on confidentiality and privacy, we make sure to implement best practices and comply with applicable privacy laws.

## The business' rights with respect to information that we collect

**An authorized person may request access to information we have about the business at any time by contacting the caisse / credit union or component that the company deals with or by calling us at 1 888 AFFAIRE (1 888 233-2473).**

If you have questions about personal information held by Desjardins, please see our [Desjardins Group's Privacy Policy](#).