

National Bank Financial Group (NBFG) is committed to protecting your clients' personal information. This policy explains our practices for collecting, using and disclosing personal information pertaining to your clients, as well as the measures taken to ensure that such information is properly managed.

The policies and practices we have implemented were formulated based on their compliance with the standards set out in the *Personal Information Protection and Electronic Documents Act* (Canada) as well as any other equivalent provincial law and standards for protecting personal information.

“ Personal information “ means any information identifying your clients, including name, address, telephone number, e-mail, fax or other contact information, financial information concerning spouse, information concerning occupation or that of the spouse, as well as your clients credit information.

NBFG policies and practices regarding the protection of your personal information are governed by the following principles:

We are accountable to you and your clients

We are responsible for all personal information we manage, including all information entrusted to a third party for processing, storage or other purposes. We have formulated and implemented specific policies and procedures to ensure the protection of personal information, which includes the appointment of a person in charge of protecting personal information. As a condition of employment, all our employees have pledged themselves to a code of ethics in which one of the basic principles is to maintain the confidentiality, security and privacy of the information in each clients records. Similarly, we ensure that on an ongoing basis our personnel receives training and is regularly updated on new issues regarding company policies and procedures that concern the handling and protection of personal information.

We keep you up to date on why information is collected

To open an account at NBFG, we must collect specific personal information in order to comply with legal and regulatory requirements. Your clients' records may therefore contain information on the annual earnings, profession and social insurance number. Before or at the time of collecting personal information, we specify the purpose for which it is intended. We explain why NBFG is collecting, using and disclosing the personal information in the documents used when opening an account at NBFG for the first time.

We obtain your clients consent for the collection, use and disclosure of personal information

When opening an account at NBFG, by signing the *Agreements and Acknowledgements* section attached to the *Terms and Conditions*, your clients state that they consent to the collection, use and disclosure of personal information as provided under the section *Collection, Use and Disclosure of Personal Information*. They may refuse to agree to the collection, use and disclosure of personal information. They may also withdraw your consent at any time, subject to restrictions provided by law or by a contract and reasonable advance notice. In many cases, the collection, use and disclosure of personal information is reasonably necessary to maintain the account or provide services. In such cases, we may be obliged to close the account or cease to provide services to you.

We limit the use, sharing and storing of your personal information

NBFG uses personal information as required or permitted by law. In particular, NBFG uses your personal information for the purposes described in your *Account Terms and Conditions* booklet. NBFG may share your personal information with third parties, including in the following circumstances: where we have obtained your consent to do so; when we share personal information with other organizations, including credit agencies, guarantors and third parties with whom NBFG maintains business relationships, in accordance with the Account Terms and Conditions.

We only keep records containing personal information for as long as required for our commercial undertakings in accordance with our internal information retention policies or in compliance with legal and regulatory standards and requirements. These records will be kept at the NBFG Branch that you normally deal with, the Compliance Department of NBFG or with one of our service providers.

Strict procedures governing the storage of personal information are applied and we delete any personal information that NBFG no longer requires for the purposes it has identified.

Personal information security is a priority at NBFG

We apply strict security measures to protect personal information from unauthorized access, regardless of the format used for storing the information. We strive to keep our security measures in step with new technological developments. The methods for ensuring protection include: physical security devices such as controlled-access offices and locked filing systems; electronic and technical security keys for computerized personal information such as the use of passwords, database encryption and personal identification numbers; organizational processes such as restricting access to your personal information to a select group of persons; and contractual obligations with third parties who have access to personal information, which bind them to protect the confidentiality and security of your clients personal information.

We respond to your questions and concerns regarding the protection of personal information

NBFG will promptly and accurately respond to your questions and concerns about the confidentiality and security of your clients personal information and our personal information management policies.