

MBNA Privacy Policy

Table of Contents

Scope and definitions	2
How & why we collect your personal information	2
○ Details on how and why we collect your information	5
○ Information we collect from you	5
○ Information from other sources	5
How we use your personal information	6
○ Provide products and services and manage our business	6
○ Insurance products & services	7
○ Engaging with you	7
○ Legal compliance and security	8
○ Interacting with us online	9
○ Use of Web based and tracking tools	9
○ Online behavioural advertising	10
○ Our mobile apps	11
○ Android app permissions	12
Sharing information within TD	13
○ We share information within TD	13
○ Our service providers	13
Disclosing your information	14
○ Providing our products and services to you	15
○ Managing our business, risks and legal compliance	17
Protecting your personal information	18
○ Security measures	18
○ Transfers of your information to other regions	19
○ Retaining and destroying your personal information	19
Your rights to access and correct information	19
○ Correcting your personal information	20
○ Automated decision making	20
○ Questions?	21
Resolving a complaint	21
○ Do you have a complaint?	21
More information	21
○ Privacy Policy updates	21

MBNA Privacy Policy

Scope and definitions

Thank you for trusting us with your information. This Privacy Policy explains how and why, your personal information is handled at MBNA.

You agree to this Privacy Policy when you:

- apply for or use any product or service that we offer in Canada,
- use any of our Canadian website and mobile apps services and
- otherwise interact with us.

This Privacy Policy applies:

- when you apply for or use any products and services we offer in Canada,
- during the course of our relationship with you and for a period of time after the end of our relationship.

We may give you additional privacy terms for a product or service when you sign up for or use that product or service.

MBNA is a division of The Toronto-Dominion Bank. For more information on how and why The Toronto-Dominion Bank and its subsidiaries and affiliates around the world (“**TD**”, “**we**”, “**us**” or “**our**”) handle your personal information outside of MBNA, you can read the TD Privacy Policy at www.td.com/privacy.

Some important terms in this Privacy Policy are:

- “**you**” and “**your**” means:
 - anyone who applies for or uses any product or service offered by us in Canada. This includes individuals and legal entities such as corporations and partnerships.
 - the authorized representatives of individuals and legal entities.
 - a legal guardian of an applicant, user or customer.
 - Individuals who visit our websites.
 - Individuals, including authorized users, who are directed to our Privacy Policy as part of the terms and conditions of any MBNA product.
- The word “**information**” means your personal information.
- “**brand relationship**” means any relationship that we have with an organization that endorses a particular MBNA product and any related service which may allow you to participate in loyalty programs of that organization.

How & why we collect your personal information

The following table highlights some of the information we collect about you, the main sources we get that information from and why we collect it. For more comprehensive information, please review the details following the table.

Source	Types of Personal Information	Reason
<p>You, including:</p> <ul style="list-style-type: none"> information you submit or communicate to us information from your use of our products and services information we collect through your interactions and engagement with us 	<p>Contact information</p> <p>Background and financial information</p> <p>Identity verification information</p> <p>Your products, services and preferences with us</p> <p>Transaction and rewards information</p> <p>Other information you may choose to provide us</p> <p>Employment information</p>	<p>Provide products and services and manage our business</p> <p>Assess your eligibility for products and services and manage our risk</p> <p>Communicate with you and share promotions, offers, contests and surveys</p> <p>Comply with regulatory reporting obligations</p> <p>Develop and improve our products and services or identify new or different products and services that may be of interest and appropriate for you</p> <p>Understand your needs and give you personalized service</p> <p>Detect and prevent fraud</p>
	Online interactions	<p>Communicate with you and share promotions, offers, contests and surveys</p> <p>Develop and improve our products and services or identify new or different products and services that may be of interest and appropriate for you</p> <p>Understand your needs and give you personalized service</p> <p>Manage our risk</p>
	SIN (optional)	<p>Provide products and services and manage our business</p> <p>Assess your eligibility for products and services and manage our risk</p>
Payment networks	Transaction and rewards information	Provide products and services and manage our business

Source	Types of Personal Information	Reason
Brand relationships	Contact information Background, identity and financial information Transaction and rewards information Identity verification information	Provide products and services and manage our business Assess your eligibility for products and services and manage our risk Communicate with you and share promotions, offers, contests and surveys
Credit bureaus	Contact information Background, identity and financial information (including credit information)	Provide products and services and manage our business Assess your eligibility for products and services and manage our risk Help us collect a debt or enforce an obligation owed to us by you Prevent and address fraud Manage and assess our risk Comply with regulatory reporting obligations
Marketing lists	Contact information Generalized information about a region or neighbourhood, like the number of online shoppers, the credit score range and aggregated census demographic data	Communicate with you and share promotions, offers, contests and surveys
Government and fraud agencies and registries and other organizations to detect or prevent fraud, law enforcement and public records	Contact information Background, identity and financial information (including credit information) Transaction information Identity verification information	Comply with legal obligations Manage our risk Detect and prevent fraud

Details on how and why we collect your information

We need to collect certain information about you. We need it to provide our products and services. This includes your contact information and information to show you are eligible for our products and services. It may include information in our records that reflect our overall relationship with you.

We may also need other information depending on the product or service we're providing.

Information we collect from you

The information we may collect includes:

- Contact information such as your:
 - name
 - phone number
 - preferred language
 - address and postal code
 - email address
- Background information such as your:
 - date of birth
 - financial information
 - Social Insurance Number (SIN)
 - occupation and employer
 - identification
 - in some cases, information about your spouse, family or household members
- Information to help confirm your identity and protect your accounts, such as:
 - answers to security questions
 - mobile phone number
 - device identifiers
- Information that reflect your dealings with us, and through us, such as:
 - account or credit card transactions
 - records of inquiries by phone, online or in person
- Other information about your relationship and interactions with us, such as:
 - your personal preferences
 - what products and services you have with us
- Details about the ways you interact with us, such as:
 - how you use our websites, mobile apps and phone services
 - the devices you connect from and their settings, including:
 - the date and time of your use
 - country code
 - IP address-associated location

See the “**Interacting with us online**” section below for more details on information we collect through our websites and mobile apps.

Information from other sources

We may collect your information from sources other than directly from you. In some cases, information will only be collected from these sources once, such as when you apply for a product or service. In other cases, it will be on an ongoing basis when necessary to maintain the product or service or confirm your eligibility. For example, information from credit reporting agencies may

be required throughout your relationship with us to confirm that you remain eligible for credit products.

These other sources include:

- Government agencies and registries, law enforcement authorities and public records, such as bankruptcy or criminal records
- Other financial or lending institutions. For example, if you have credit accounts with other banks
- Background check databases and other registries we use to check the information you give us
- Payment card networks
- Persons who you authorize to act on your behalf under a power of attorney. Or any person who has the legal authority to act on your behalf
- Organizations who transfer, sell, or assign to us any of your loans or other obligations owed to them. Or when we consider those transactions
- Information about rewards programs, contests and other promotions from co-brand relationships
- Credit bureaus, such as Equifax or TransUnion
- Fraud prevention agencies and investigators and other organizations to detect or prevent fraud
- Records that reflect your use of the products and services you have with us
- References, or other contacts you give us
- Organizations you have accounts with, when we buy all or part of their business. Or when we consider those transactions
- Your interactions with us, including over the phone, at the ATM, on your mobile device or through email or the Internet

Insurers. We may collect personal information from insurers as part of coordinating and confirming insurance coverage associated with a product or service we offer. The insurer's privacy policy will have details about how they handle your personal information. In many cases, in order to collect information from the sources described above, we will disclose some of your information to help ensure we are collecting accurate information about you.

How we use your personal information

Provide products and services and manage our business

We use your information to help us deliver and manage our products and services. This includes when we:

- verify your identity
- comply with regulatory reporting obligations
- detect and prevent fraud
- communicate with you
- assess your eligibility for products and services

We use your information for the purposes of serving you and to administer our business, including to:

- verify your identity

- provide you with ongoing service and information related to the products and services you hold with us
- help us collect a debt or enforce an obligation you owe us
- give you personalized service and understand your needs and preferences
- set credit and transaction limits
- evaluate and process your application, accounts, transactions and reports
- train staff and confirm our discussions with you
- develop and improve our products and services or identify new or different products and services that may be of interest to you
- identify trends in your use of our products and services
- help manage and assess our risks, operations and relationship with you

These purposes apply throughout your relationship with us.

We may use technology to analyze your information for these purposes. We may pool your information with other peoples' information for research and to create statistical reports. These reports will not identify you.

In some cases, the use and disclosure of your information is a core part of the product or service. In these cases, if you don't agree with our use and disclosure of your information, you will need to choose a different product or service.

Insurance products & services

For insurance products and services, we also use your information as follows:

- **Balance Protection** – For balance protection insurance, like our Credit Card Payment Protection Plan, we will use your information to assess your eligibility. We also use this information to confirm your coverage with Assurant, who provides this insurance. For details on how Assurant handles your information, including when you submit a claim, you can review the Assurant Privacy Policy at www.assurant.ca/privacy-policy.
- **Travel Insurance** – Where travel insurance is included on your MBNA credit card, it is provided by TD Insurance. Refer to the **TD Privacy Policy** at www.td.com/privacy for details on how we handle your information when you submit an insurance claim.

Engaging with you

We use your information to communicate with you. We also use it to improve and get feedback on our products and services and communications with you. You have choices about how and when we communicate with you.

We use your information to enhance our relationship with you. For example, to:

- **Improve live communications with you** – We may collect and use certain information when you:
 - talk to one of our telephone service representatives or internet live chat agents, or
 - message with us through social media.

When you do these things, we may monitor or record our discussions. We do all this for our mutual protection, to identify trends, train staff and confirm our discussions with you.

- **Share promotions** – To tell you about, and offer, other products and services that may interest you and be appropriate for you. This includes products and services offered by

other businesses within TD. This also includes products and services offered by third parties we select.

- **Contests or surveys** – To see if you are eligible to participate in contests. To administer these contests. To send you surveys or promotions.
- **Check your eligibility for additional products and services** – We use your information to see if you are eligible for additional MBNA or TD products and services that may meet your needs. We also use it to personalize offers. This includes information from credit bureaus about you and your credit products.
- **Contact you** – We may use the numbers and addresses you gave us to contact you by:
 - telephone
 - text
 - an automatic dialing-announcing device
 - any other method
 - email
 - mail
 - internet

You can opt out of receiving offers. You can also choose how we contact you for marketing purposes. To exercise your choice, please contact us by phone at **1-866-845-0980**. Please note that changing your preferences may not stop you from receiving offers for a marketing campaign that is already underway when you contact us.

Be careful of fraudsters. We will not send you an unsolicited email to ask you to provide information or login information, such as your username, PIN, password, or account number.

If you receive an email claiming to be from MBNA that you think is fraudulent, don't respond to it. Don't open or click any links. Don't open attachments in the email. Please notify us immediately by forwarding a copy of the email to us at **phishing@td.com**. Then delete the email.

- **Managing credit products and risk** – For credit products, we use credit reports and other lender information to:
 - review and verify your creditworthiness
 - help us collect a debt or enforce an obligation owed to us by you
 - better understand your needs and preferences
 - establish credit and hold limits
 - prevent and address fraud
 - manage and assess our risks
- **Contractual compliance** – We use your information to:
 - collect your debts
 - enforce legal obligations you owe to us
 - investigate your compliance with our agreements

Legal compliance and security

We must use your information to comply with laws, regulations and industry rules. We must also use it to prevent and investigate crime.

Complying with sanctions and financial crime laws – We must use your information to comply with financial crime laws, anti-money laundering laws and sanction laws.

We must also use your information to check if you are a politically exposed person (as defined by law). We may also use public information to see if you are a politically exposed person. For example, commercial databases or credit reports.

Preventing fraud and other crimes – We use your information to prevent, detect or suppress:

- financial abuse
- criminal activity
- fraud
- security risks

We also use your information to:

- assist us with any internal or external investigation into potentially illegal, fraudulent or suspicious activity
- manage, defend or settle any actual or potential loss
- protect our assets and interests

In order to do these things, we may share your information with any person or organization, including any:

- fraud prevention agency
- the operator of any database or registry used to check information provided against existing information
- regulatory or government body
- any entities engaged in the insurance or financial lending business

When we do share your information for these purposes, we may sometimes pool your information with data belonging to other individuals.

Other regulatory compliance – We will use your information to comply with all laws and regulations. We will also use it to comply with the rules, demands and guidance from regulators. This includes self-regulatory organizations.

Interacting with us online

When you interact with us online or in our app, we collect, use and disclose your information to:

- deliver our products and services
- prevent fraud
- improve and personalize your experience
- customize how we advertise on third party websites

Use of Web Based and Tracking Tools

We, and third parties that we select, use certain technologies and tracking tools on our websites and app to deliver our service, improve and personalize your experience and prevent fraud. As one example, we use cookies. Cookies are snippets of data stored by a web browser (For example, Chrome, Safari or Firefox web browsers). We also use pixels, beacons, Software Development Kits (SDKs) and other technologies. We call these "web based tools".

Essential Web Based Tools – We use essential web based tools to provide the functionality and security of your online and mobile experience, and to help us detect, prevent and investigate fraud. For example, this allows us to remember your language preferences and provide a secure connection. These tools may collect information about your usage of our website and app. You can't opt-out of the use of essential web based tools, but you may be able to disable the ability

for your browser to accept them. If you disable them, some of our websites might not work properly and you may not get the best experience.

Non-essential Web Based Tools –

Performance

We, as well as third parties we select, collect and use non-essential web based tools to tell us about the performance and usage of our sites and apps. These tools help us to understand which pages you go to most often and if you encounter errors or performance issues. These tools also help us measure and analyze the traffic on our online services by establishing statistics and traffic volumes (e.g., pages visited or features used).

Targeting

We, as well as third parties we select, collect and use your online browsing and activity on our websites and apps to better understand your interests and provide you with personalized content and offers. This may also include information about the products or services you are applying for.

This information may be used by those third party companies in accordance with their respective privacy policies.

This information may also be used to build a profile of your interests, to personalize your content and present you with relevant offers, including on third party sites.

You may review a list of third parties and their privacy policies by using the "Manage Online Experience" preference centre by scrolling to the bottom of the TD webpage and clicking "Manage online experience".

Personalizing Content – You have choices about how we use non-essential web based tools. To update your preferences, use the "Manage Online Experience" preference centre by scrolling to the bottom of the TD webpage and clicking "Manage online experience".

If you adjust your browser settings to refuse web based tools, you may still receive generic TD ads. However, they will not be based on your preferences or the products and services that you hold with us.

Online behavioural advertising

We subscribe to the Digital Advertising Alliance of Canada's Self-Regulatory Principles for Online Behavioral Advertising. These principles promote consumer awareness and choice about how organizations use consumer information for online behavioral advertising.

Online Behavioural Advertising – We are able to track which of our ads you interact with on third party websites. We may also collect and use information about your relationship with us (such as transactional information) to help provide tailored TD ads or offers to you. If you click on one of our ads on a third party website, we may use web based tools. We use web based tools to track how effective our online advertising is. We may also use web based tools to deliver ads that may be relevant to you in the future.

To learn more about online behavioural advertising and the icon you may see on websites and online ads, you can visit the TRUSTe's online opt-out tool. It is available at: <http://preferences.truste.com/truste/4>.

We have enabled these Google Analytics Advertising Features:

- Re-Marketing with Google Analytics, and
- Google Analytics Demographics and Interest Reporting

We use Google Analytics to better understand your use of our website. The tool collects information about user behaviour, which includes how many times a user visits our website, what pages they visit and where they were referred from. Advertising identifiers for mobile devices, as well as generalized location, gender and age group information may also be collected. Google may use the data collected for their own purposes, including to contextualize and personalize the ads on their own advertising networks.

To learn more about how Google uses data when you visit websites using Google Analytics, go to <https://policies.google.com/technologies/partner-sites>. You may opt out of Google Analytics tracking at www.google.com/policies/privacy/partners. To do this, install the Google Analytics Opt-Out Browser Add-On, available at tools.google.com/dlpage/gaoptout. You may opt out of advertising on Google's opt-out page.

Relationship-based Ads – We may collect and use information about your relationship with us to help decide which ads or offers to present to you and to identify other people with similar interests on the websites of companies who help us advertise. For example, we may match your masked contact information with social media or other sites and, if you are a member of that site, use it to show you or others with similar interests our ads. Those sites may track how you interact with our ads. We won't do this if you have opted out of receiving marketing from us or have opted out of relationship-based ads with your social media or webmail sites.

- You can view your settings and opt-out of receiving relationship-based ads by updating your settings on your social media or webmail sites.

Search engine interest-based tracking – We advertise on search engine results pages. Search engines may use several factors to decide which ads to place. These factors include your search terms and browsing history.

You can opt-out of interest-based search engine advertising. Just select the notification icon after the URL within the ad text to adjust your settings. You may still see our generic MBNA- or TD-branded ads after you opt-out. We don't base these ads on interests or browsing history.

Responding to surveys online – We place surveys on third party websites. When you respond to an online survey, we may use your answers or any opinions or information that you volunteer. We may use them to improve our products or services or to contact you.

Our mobile apps

If you use the MBNA mobile app, we collect and use your information to:

- Deliver and improve our mobile app services
- authenticate you
- help us understand how our users use the app
- keep the app secure and prevent fraud

We advertise to you on third-party apps. To do this, we use your device identifier. For example:

- Apple's Identifier for Advertiser (IDFA), or
- Google Advertising ID (AAID)

The chart below lists the type of information we collect on the MBNA Mobile App and how we use it:

Information we collect	How we use this information
<ul style="list-style-type: none">▪ The version of the App▪ The language being used by the customer▪ Make and model of your device▪ The version of the operating system of your device▪ The platform type▪ The device type	<ul style="list-style-type: none">▪ Identify and communicate with your device (for example, push notifications)▪ Use and provide cards for mobile payment (for example, payment network requirements for Visa, Mastercard and Interac®)▪ Authenticate you and your device▪ Provide you with services and offers compatible with your device▪ Perform analytics▪ Prevent fraud▪ Determine the eligibility of your device▪ Generate and send TD advertising on third party apps

Android app permissions

When you download the MBNA Mobile App on an Android device, the App may ask you to accept some "Android permissions". Some of these Android permissions relate to how we are going to use your information.

Our App may ask you to consent to these Android permissions the first time you download the app. Or when you access specific features in our App. The chart below lists these additional Android Permissions requested by our App and why.

Android permission	How we use this information
Device and App history	When multitasking, our App may use device and App history to retrieve the App from the background and to keep you logged in for up to 10 minutes.
Storage	The App requests permission to enable download of online statements onto your device from the App.

Android permission	How we use this information
Phone	We will not access your phone log.
Photos/Media/Files	To view your downloaded online statements from your device.
Wi-Fi connection information	Our App checks for and uses an active internet connection to allow the App to function through communication with our servers.
Device ID	<ul style="list-style-type: none"> ▪ Identify and Communicate with your device ▪ Authenticate you and your device ▪ Provide you with services and offers compatible with your device ▪ Perform analytics ▪ Prevent fraud

Sharing information within TD

We share information within TD

We are committed to legendary customer service. We strive to give you streamlined services and eliminate repetition and annoyances for you. To help us manage your total relationship with us, we share your information within TD (except where the law doesn't allow it). In some cases, this includes sharing your information with our affiliates in other regions or countries.

We may share your information within TD for these purposes:

- to manage your total relationship within TD, including servicing all your product and services. It also includes maintaining consistent information about you
- to improve our products and services
- to personalize your experience
- to allow other businesses within TD to tell you about and advertise their products and services
- to better understand your needs and preferences
- to develop, augment or provide our products and services to you
- to manage and assess our risks and operations. This includes to collect a debt owed to us by you
- to comply with legal and regulatory requirements

You may opt out of marketing from any TD business. To exercise your choice, please call us at **1-866-845-0980**.

Our service providers

We use service providers for many reasons. For example, they help us serve and communicate with you. They support our business operations, help us develop products, and make service

enhancements. They help us to market our products and services. They help us to comply with the law.

Our service providers may only access and use your information to provide the services under their agreement with us. In some cases, our agreements allow these service providers to use the data to improve their service. For example, to develop tools that prevent fraud. We carefully assess our service providers' security practices. We also require that they keep your information confidential and destroy it when they no longer need it.

Disclosing your information

The following table highlights some of the ways we disclose your information, who we disclose it to and why. For more comprehensive information, please review the details following the table.

Recipient	Types of Personal Information	Reason
Brand relationships	Contact information Account, transaction and rewards information Financial information, date of birth and other background information	Provide products and services and manage our business Communicate with you and provide you with offers and promotions
Payment networks	Account, transaction and rewards information	Operate the payment system that supports your product or service with us Provide products and services and manage our business Update your card information with merchants that bill you on a recurring basis Legal compliance and security
Other financial institutions	Contact information Background and financial information Transaction information	Assess your eligibility for products and services and manage our risk Legal compliance and security
Insurers	Contact information Background and financial information	Provide insurance products and services and manage our business Confirm your eligibility for insurance products and coordinate coverage

Recipient	Types of Personal Information	Reason
		Legal compliance and security
Credit bureaus and other lenders	Contact information Financial and background information, including account and credit information Date of birth SIN (if provided)	Provide products and services and manage our business Assess your eligibility for products and services and manage our risk Establish your credit history and support of the credit granting process in general Legal compliance and security
Law enforcement, fraud prevention agency, regulatory or government bodies	Only the information required in the circumstances	Emergencies – if we think there is imminent danger to the life, health or security of an individual Financial abuse and protection – if we think you might be a victim of fraud, financial abuse or other illegal activity Detect and prevent fraud Legal compliance and security
Businesses that buy or collect debt	Contact information Background, identity and financial information Your products, services and preferences with us Any other information required in the circumstances	Manage our business and risk Enforce an obligation that you owe Legal compliance and security

Providing our products and services to you

We may disclose information to third parties, including to credit bureaus, payment networks and others. We disclose to these parties to help us deliver the products and services you request and to manage our business and risks.

We may disclose your information:

- To people or organizations with your direction or with your consent.
- To payment card networks so that they can:
 - Operate the payment system related to your product or service with us

- Support any contests or other promotions they may make available to you
- Use limited information for their internal research and analysis purposes
- Make products and services available to you in connection with your product or service with us
- Update your card information with merchants that bill you on a recurring basis

Please review the privacy policies of the payment card networks relevant to your products, such as Visa or Mastercard.

- **To brand relationships.** We will disclose your information to brand relationships only if you apply for or use a co-branded service that we offer. For example, a payment card with loyalty program benefits. We disclose your information to our brand relationships for several reasons, such as to:

- see if you are eligible for the co-branded product or service
- set up the co-branded product or service
- administer, analyze and market the co-branded service, including awarding any points or rewards. This includes analyzing and developing your benefits

The information that we disclose to brand relationships may include transactions on your co-branded product, contact information and date of birth. It may also include any other information that is relevant to the co-branded program.

Our brand relationships will collect and use your information as set out in the terms and policies of their programs.

- **Insurers.** We disclose your personal information to insurers so that they and we can assess, coordinate and confirm your insurance coverage that is associated with a product or service we offer. The insurer's privacy policy will have details about how they handle your personal information.

- **When we assign (sell) or securitize part or all of your credit card** and the collateral charge to someone else, we can disclose your information to the participating organizations. We will only disclose for the purposes related to the assignment or securitization. These organizations include:

- | | |
|-------------|----------------------------|
| ○ auditors | ○ credit bureaus |
| ○ creditors | ○ financial institutions |
| ○ issuers | ○ underwriters |
| ○ insurers | ○ proposed purchasers |
| ○ advisors | ○ governmental authorities |

- **To credit bureaus and other lenders.** In connection with credit products, we may disclose your information at the time of and during the application process, and on an ongoing basis. We do this to:

- review and verify your creditworthiness
- help us collect a debt or enforce an obligation owed to us by you
- establish credit limits
- to manage and assess our risks

Once you have a credit product with us, we may continue to disclose your information to other lenders and credit bureaus. And other lenders and credit bureaus may disclose your information to us. We may keep doing this for a period of time after your credit

facility ends. This helps establish your credit history and supports the credit granting process in general.

Once you have applied for any credit product with us, you may not withdraw your consent to this exchange of your information with the credit bureaus. You can see or correct your information contained in your credit bureau file. To do so, contact the reporting agencies directly. Here are the links to their websites:

www.consumer.equifax.ca and www.transunion.ca.

Managing our business, risks and legal compliance

We will disclose your information to third parties to manage our business and legal obligations.

For example, when we sell all or a part of a business or assets. Or when we engage with others to:

- deliver a product or service
- cooperate with estate and bankruptcy trustees
- collect debts
- prevent fraud or investigate misconduct

Business transactions – We may disclose your information when we enter into a business transaction. Examples include when we:

- buy or sell all or part of our business or assets
- assign or grant a participation in all or part of a credit facility, lease, or other asset
- securitize assets
- consider any of those transactions

If we sell assets involving your information, the purchaser may be permitted or required by law to retain your information. We require parties entering into a business transaction with us to keep your information confidential.

Debt collection – We may sell your debt to a third party. If we do, we may disclose your information needed to allow that third party to securitize and/or collect the debt.

Estates and bankruptcy matters – We may disclose to the estate representative all account information up to the date of death. However, if the account is in Quebec, we may disclose to the liquidator all account information up to and after the date of death. We may provide any of your information to your estate or bankruptcy trustee as required by law.

Preventing fraud and protecting our interests – We may disclose your information in order to:

- prevent, detect or suppress financial abuse, fraud or criminal activity
- investigate potentially illegal or suspicious activity
- protect our assets and interests
- manage, defend or settle any actual or potential loss

To do so, we may disclose your information, individually or pooled with other people's information, to any person or organization including:

- regulatory or government body
- fraud prevention agency
- the operator of any database or registry used to check information provided against existing information
- investigative body
- insurance companies or financial or lending institutions

Emergencies – We may disclose your information to law enforcement, government authorities or their agents, in emergencies. This would arise if we think there is imminent danger to the life, health or security of an individual.

Financial abuse and protection – We may disclose your information if we think you might be a victim of fraud, financial abuse or other illegal activity. We may disclose it to:

- law enforcement, government authorities or their agent
- a family member (if we are authorized or required to do so)
- other financial institutions or organizations
- your legal representative

Court orders, regulatory demands and other legal compliance – We will disclose your information to third parties where the law requires us to do so. For example, to comply with court orders or legal and regulatory obligations. We may also disclose your information to third parties where the law permits us to do so.

For example, we disclose your information to:

- Regulators, courts, law enforcement and other organizations to respond to requests that we believe to be valid. For example, a court order, search warrant or other demand or request, and
- Regulators and self-regulatory organizations to comply with legal and regulatory requirements that apply to us.

Protecting your personal information

Security measures

We have internal policies and security standards to help protect our systems and your information against unauthorized access and use. We retain your information only for the time we need it. And we only use it for the purposes that we explain to you.

For example, we designed our systems so that your Personal Identification Number (PIN), password and other access codes are always private and confidential.

Our agents and service providers are bound by contracts to keep your information confidential, and they must not use it for any unauthorized purpose.

We train our employees on the procedures they must take to keep your information safe.

We have policies and procedures to:

- prevent unauthorized access to your information
- limit the use of your information to the purposes explained to you in this Privacy Policy
- retain your information for the period we need it to serve you and manage our business and legal obligations
- help make sure that any service providers or agents who handle your information on our behalf, in Canada or elsewhere, protect that information
- respond to privacy questions, complaints or breaches
- honour the choices you made about your information
- securely destroy your information or convert it to an anonymous form after the time we don't need it

We review our procedures and security measures regularly. We do this to help make sure that they remain effective and appropriate.

We may modify your information to help protect you. For example, before we use it or disclose it we may:

- remove direct identifiers, (for example, your name),
- pool it with other customer information, or
- convert it into an anonymous form.

Some of the ways we use your information are to support our efforts to protect your security. For example, we may ask you to provide certain information to authenticate you. It also helps to prevent unauthorized access to your accounts. And it helps to make sure we are collecting the correct information from third parties.

You can obtain more information about our policies, procedures and security standards. Please contact us using the information under the heading “Questions” below.

Transfers of your information to other regions

We are a global organization. TD has affiliates and service providers across Canada and in other countries. TD and its service providers may use, store or access your information in any region in Canada and other countries. These countries may include the USA, UK, European states, India or others. We take measures to protect your information wherever it is handled. However, like in Canada, TD and its service providers may disclose your information in response to valid demands or requests made by governments, regulators, courts and law enforcement authorities in these other regions.

Retaining and destroying your personal information

We retain your information only as long as we need it for the purposes for which it was collected, used or disclosed. We have procedures to help us determine the length of time we will retain your information. The length of time varies. It depends on the product or service, the sensitivity of the information and the purposes for which we use it. We may retain your information after the end of your relationship with us. For example:

- when we need your information to respond to issues that may arise at a later date
- to support the credit reporting system
- for security purposes
- for legal or regulatory purposes
- to support fraud prevention agencies and other risk assessments

We have procedures to guide what we do when we no longer need your information for these purposes. We may securely destroy, delete, or erase it. Or we may convert your information to an anonymous form.

You can contact us if you have questions about how long we retain your information. Contact us using the information under the heading “Questions” below.

Your rights to access and correct information

Upon request, we will give you access to the information we retain about you. If you ask us, we will help you make your request.

Most of your information is in the form of your transaction records, such as account statements. Here's how you can obtain your transaction records:

- log in to online banking or our App, or
- call us at **1-866-845-0980**.

If you need information not found in your transaction records, simply call us or send us a written request. We will ask you for your information to confirm your identity. We will also ask for specific details such as your account number.

We will let you know in advance if we will charge you for searching for your information. We will respond to your request within 30 days.

If you ask us why we made a decision about you, we will tell you why. If we made our decisions based on information from a third party, such as a credit bureau, we will give you the name and address of the third party. But see the next paragraph where we set out when we may not be able to give you any of this information.

We may not be able to give you information about you for a variety of reasons. For example, we may not be able to provide information that:

- contain references to other persons
- contains confidential information
- relates to an internal or external investigation
- relates to a possible violation of law
- is subject to legal privilege
- contains information that is proprietary to us
- relates to a risk assessment
- we cannot disclose for legal reasons

Correcting your personal information

We make reasonable efforts to keep your information accurate and up-to-date.

This helps us give you better service. It also reduces the chance that we may use wrong information to make a decision about you. We have procedures and practices to help us maintain the accuracy of your information.

You can help by keeping us informed of any changes. For example, tell us if you move or change telephone numbers. If you find any errors in our information about you, let us know right away. We will make the corrections. We will also give the corrections to anyone we gave your information to and who relies on it. If we do not agree with your requested change, we will note your request in your file.

Automated decision making

We use various technology tools to help us serve and communicate with you. We also use them to anticipate your needs and protect you. In most cases, these tools help, but don't replace, our employees in meeting your needs. In some cases, the tools allow us to make decisions about you in real time because the process is fully automated. When this occurs, we may notify you in advance of the decision, for example, in the application process. We will also tell you how you can contact us to learn more about the automated decision process.

Questions?

If you have any questions on this Privacy Policy, you may call us at **1-866-845-0980**.

If this does not answer your question, you may contact TD's Chief Privacy Officer at:

Email: TD.MBNA.Privacy@td.com

Mail: Toronto-Dominion Centre, P.O. Box 193, Toronto, ON M5K 1H6

Attn: TD's Chief Privacy Officer

Resolving a complaint

Do you have a complaint?

We take your concerns seriously. We are committed to helping resolve any complaint about how we handle your information.

If you have a complaint about how we handled your information, please review our complaint resolution process here:

www.td.com/to-our-customers/resolving-your-problems/comments.jsp

If your complaint is not resolved by TD and it relates to a potential violation of privacy law you may contact:

The Office of the Privacy Commissioner of Canada.

Website: **www.priv.gc.ca**

Phone: **1-800-282-1376** Fax: **1-819-994-5424**

Mail: 30 Victoria Street, Gatineau, QC K1A 1H3.

More information

Privacy Policy updates

We may change this Privacy Policy from time to time. The current Policy will be available on our website at **www.mbna.ca/en/privacy**.

If you have questions on this Policy, please contact us at **1-866-845-0980**.

If this does not resolve your question or request, you may contact TD's Chief Privacy Officer at:

Email: TD.MBNA.Privacy@td.com

Mail: Toronto-Dominion Centre, P.O. Box 193, Toronto, ON M5K 1H6

Attn: TD's Chief Privacy Officer