

DESJARDINS GROUP PRIVACY POLICY
REGARDING ITS MEMBERS AND CLIENTS

1. DESCRIPTION

The Desjardins Group Privacy Policy establishes the directions and rules that its components set for themselves and abide by to protect and ensure the privacy of personal information collected, held, used or disclosed about their members or clients.

The policy describes how Desjardins Group components protect member and client personal information within the context of the delivery of financial services. The policy also describes the principles applied in order to protect the privacy of client and member personal information while operating in Canada, both on an inter-provincial or intra-provincial basis.

2. PURPOSE

Aside from the fact that Desjardins Group complies with the law, it takes matters regarding the privacy of personal information very seriously and is committed to putting in place all necessary measures to ensure and maintain the accuracy, confidentiality, security and privacy of personal information of members and clients. The adoption of and adherence to a personal information privacy policy further demonstrates this concern and should bring about a heightened sense of confidence in Desjardins Group on the part of members and clients.

3. SCOPE

Each Desjardins Group component adopts a policy that is consistent with the directions and rules described in this policy. When a Desjardins Group component is subject to provincial and/or federal regulations, regulations in its area of activity or self-imposed regulations that require it to take additional measures with regard to the privacy of personal information, it must be governed by these in addition to the principles of the policy. As a result, it may establish its own specific rules within its policy.

4. DEFINITIONS

For the purposes of the policy, the following words and expressions are defined as follows:

- 4.01 “consent” Free and informed acquiescence obtained in accordance with applicable laws. A member/client may express his consent verbally, in writing or electronically.
- 4.02 “Desjardins Group” All Desjardins Group components collectively.
- 4.03 “Desjardins Group component” The Fédération des caisses Desjardins du Québec, its member caisses, the Caisse centrale Desjardins, all federation participating auxiliary members such as the Fédération des caisses populaires de l’Ontario Ltée and its affiliated caisses, and all subsidiaries directly or indirectly owned by the Fédération des caisses Desjardins du Québec and its member caisses.
- 4.04 “direct marketing” Promotions targeted to members/clients whose personal information reveals that a product or service may be of interest to them. Direct marketing includes telemarketing initiatives and mail or e-mail, but excludes statements issued on a regular basis, statement inserts, Desjardins ATM messages, and ads placed on message boards or Web sites.

- 4.05 “financial products and services” Includes, but is not limited to, deposits, loans and other personal financial services, credit services, billing services, debit and credit cards, stock brokerage and discount brokerage services, mortgage loans, trust and asset custody services, insurance services, investment management and financial planning services and mutual fund services.
- 4.06 “member/client” Person who uses or intends to use a product or service offered by a Desjardins Group component.
- 4.07 “nominative list” A list of names, addresses or telephone numbers of physical persons, whether or not compiled on the basis of a common denominator.
- 4.08 “personal information” All information about a member/client provided to a Desjardins Group component by the member/client, collected from a third party in accordance with the policy and applicable laws, or generated by a Desjardins Group component.
- 4.09 “third party” Individual or organization other than a Desjardins Group component.

5. COLLECTION, USE AND DISCLOSURE

- 5.01 Subject to the requirements of applicable laws, Desjardins Group components only collect, use or disclose personal information about their members/clients in order to:
- (a) understand the needs of members/clients;
 - (b) determine if the financial products and services taken out by members/clients meet their needs;
 - (c) recommend financial products and services that better meet the needs of members/clients;
 - (d) establish and manage the financial products and services that meet these needs;
 - (e) provide members/clients with up-to-date products and services;
 - (f) satisfy the requirements of laws and regulations;
 - (g) carry out direct marketing activities.
- 5.02 Desjardins Group components may use information about member/client deposits, investments, credit, insurance products and other personal information they have about them, including the manner in which members/clients use Desjardins Group financial products and services, in order to provide them with additional information about the said Desjardins Group financial products and services.
- 5.03 Subject to legal or contractual restrictions and to Article 8.01 of this policy, a Desjardins Group component may share member/client personal information with other Desjardins Group components, in order that they may contact members directly to inform them about their financial products and services. This exchange of personal information will only occur, however, if a member/client has signed the “Desjardins Consent” and read the accompanying leaflet entitled “*Desjardins Consent, it’s working for me.*” To obtain a copy of these documents, members/clients need simply contact the Desjardins Group component with which they do business.

6. RETENTION

- 6.01 Desjardins Group components can, subject to applicable laws, retain in their files member/client personal information as long as required for the purposes cited above, even if an individual ceases to be a member/client.

7. CONSENT

- 7.01 Subject to exceptions provided for or allowed by applicable laws, Desjardins Group components only collect, use or disclose information about members/clients for the purposes listed in Article 5 or for other purposes, with their prior informed consent. Member/client consent is obtained at the time financial services are provided, such as when making requests for financing or applying for insurance.
- 7.02 If a Desjardins Group component collects personal information from third parties (i.e., credit bureaus or other agencies, employers, hospitals) or contacts them to verify or complete personal information, it does so, subject to applicable laws, only with the prior informed consent of the member/client.
- 7.03 Except in the cases mentioned below, each time a Desjardins Group component discloses information in keeping with this policy, it keeps on record, whenever it is reasonable to do so, the nature of the information disclosed, the date of disclosure and the Desjardins Group component to which it was provided. Exceptions to this rule are: personal information provided for standard transactions, such as information provided to companies acting as agents of Desjardins Group components, the production of statements and other documents for Revenu Québec or the Canada Revenue Agency, the updating of information with these agencies and communications with third parties regarding NSF cheques.
- 7.04 Subject to legal or contractual restrictions, members/clients may refuse consent for the collection, use or disclosure of personal information about them, or withdraw it at any time. If a member/client does not want a Desjardins Group component to collect, use or disclose his personal information for any purpose or to be contacted by mail or by phone, a member can take necessary steps to the effect by contacting the component with which he does business. However, if a member/client refuses or withdraws his consent, the Desjardins Group component to which consent has been refused or withdrawn may no longer be able to provide or continue to provide the member/client with certain products, services or information that may be of interest to him or that he has requested.

8. NOMINATIVE LISTS

- 8.01 Desjardins Group components may compile and share with third parties and other Desjardins Group components nominative lists of their respective members/clients for the purpose of business or philanthropic prospecting. Members/clients may ask Desjardins Group components to remove their name from such a list at any time.

9. SUB-CONTRACTORS AND SERVICE PROVIDERS

Member/client personal information may be shared with Desjardins Group agents, sub-contractors and service providers for services such as data processing, cheque or credit card printing, statement preparation and mailing, credit collection or the processing of claims. In these circumstances, Desjardins Group components require that the information only be used for the

purpose of providing the service in question. These sub-contractors and service providers must also commit to taking all appropriate security measures to protect the personal information they receive for the duration of the time that services are provided. These obligations are valid both during and after the time the services are provided.

10. NON-IDENTIFYING INFORMATION

10.01 Desjardins Group components may use and disclose information about members/clients for statistical, market analysis or segmentation purposes provided that members/clients cannot be identified in any way and that no link can be made between the members/clients and the information used or disclosed.

11. ACCURACY OF INFORMATION

11.01 Desjardins Group components make reasonable efforts to ensure that member/client personal information is up to date, accurate and complete. Nonetheless, it is the responsibility of each member/client to promptly inform the Desjardins Group component with which he does business of any change of name, address or other relevant change to his personal information.

11.02 If a member/client believes that personal information about him is inaccurate or untrue, Desjardins Group encourages him to request access to his file to verify the accuracy of the information, and provides him with the opportunity to correct or update the information if required.

12. ACCESS AND CORRECTION RIGHTS

12.01 Subject to applicable legal restrictions, members/clients may ask to be informed of the existence, use or disclosure of personal information at any time. Members/clients simply need to visit or write to the Desjardins Group component with which they do business to access their personal information. For security reasons, members/clients must show proof of their identity before they will be given access to their personal information.

12.02 The Desjardins Group component to which a member/client has submitted a request for access will provide the member/client with the information it has on file within thirty (30) days following receipt of the request, unless granted an extension in accordance with applicable laws, where appropriate. If information research fees are required, members will be advised of this in advance, and may withdraw their request or contest the reasonableness of the fees.

12.03 Members/clients with sensory disabilities may have access, upon request to the component with which they do business, to personal information about them in a format they can read or hear if such a format is available. If such a format is not available, Desjardins Group will transfer the relevant personal information into the required format if it can reasonably do so.

12.04 If a request for access is denied, the Desjardins Group component must inform the member of the reasons for which it has denied the request, subject to applicable legal restrictions.

13. SAFEGUARDS

- 13.01 In an effort to maintain the trust of its client and members, Desjardins Group has put in place security measures to ensure and maintain the privacy, security and confidentiality of member/client personal information.
- 13.02 The employees of Desjardins Group components have read this policy and must undertake to comply with it and respect the privacy of member/client personal information. In addition to the policy, they must obey the Ethics and Professional Conduct Code applicable to them.
- 13.03 As mentioned above, sub-contractors and service providers doing business with Desjardins Group components must commit to protecting the privacy and confidentiality of personal information disclosed to them for the purpose of the services they provide.
- 13.04 Desjardins Group also has in place significant safety measures to protect its information systems. Only authorized personnel may access the facilities where personal information is received, processed or stored. Moreover, information systems and data processing procedures are subject to appropriate safety measures such as passwords, encryption of information, access control to applications and databases, firewalls, anti-virus software and intrusion detection systems, which are reviewed on a regular basis in order to ensure the security of transactions and the privacy of the data processed. Further information about specific protective measures in place for transactional services and online applications are available on the following Web site: www.desjardins.com.
- 13.05 When Desjardins Group components determine that they no longer require the personal information for the purpose for which it was collected, they destroy or erase the information, subject to applicable laws and in keeping with Desjardins Group internal records retention and destruction policies.

14. QUESTIONS/COMPLAINTS/RECOURSES

- 14.01 Members/clients must address any question, suggestion, dissatisfaction or comment considered important, to the Desjardins Group component with which they do business. More specifically, each Desjardins Group component has designated a person responsible for responding to member/client questions about their personal information or how the component abides by this policy. This person is also responsible for informing members/clients of the appropriate procedure complaint resolution procedure to follow.
- 14.02 If a member/client is dissatisfied with the results obtained from the Desjardins Group component with which he does business, or, as a last resort, with the Desjardins Group ombudsman, he may contact the governmental authority responsible for protection of personal information in his area of residence.

15. CHANGES TO THE POLICY

- 15.01 Desjardins Group reserves the right to change the policy at any time. New versions of the policy will be published on www.desjardins.com and be available on demand from each Desjardins Group component. Desjardins Group encourages its members/clients to refer to its Web site on a regular basis to stay up to date at all times on the most recent version of the policy.

16. ADMINISTRATION OF THE GROUP POLICY

In charge of policy adoption:	The Board of Directors
In charge of recommendations:	Corporate Executive Division of Desjardins Group
Policy to be applied by:	Each component by its designated officials.
Date of acceptance:	March 16, 2005
Policy goes into effect:	Immediately
Policy to be updated:	At least once every three years.
Last revised:	

N.B. The masculine gender has been used throughout this document for the sole purpose of brevity; it is not, in any way, intended to be discriminatory.