

# BMO Privacy Code – Canada

**Our Commitment to You.** BMO Financial Group appreciates the opportunity to help you meet your financial needs. From the day Bank of Montreal was founded in 1817, earning and keeping your trust has been at the very core of our business. We are committed to respecting and protecting the privacy and confidentiality of the personal information you have entrusted to us. It is important for you to understand what personal information we will collect, how we will use it, and who may see it.

## Scope

This Privacy Code applies to the operations of BMO Financial Group<sup>1</sup> in Canada, regardless of how you choose to do business with us – in our branch or office, at an automated banking machine, online, or by telephone.

This Privacy Code outlines our commitment to you and incorporates the following 10 key privacy principles:

1. Accountability
2. Identifying Purpose
3. Consent and Your Choices
4. Limited Collection
5. Limited Use and Disclosure
6. Retention
7. Accuracy
8. Safeguards
9. Openness
10. Individual Access

## Other Important Information

- Online and Mobile Privacy Policy
- Contact Us

## 1. Accountability

We have strict policies and procedures governing how we deal with your Personal Information<sup>2</sup>. Each and every one of our employees is responsible for respecting and protecting the Personal Information to which the employee has access.

Our Chief Privacy Officer oversees privacy governance including policy, dispute resolution, education, communications activities and reporting to our Board of Directors on privacy matters. Please see Contact Us for information on how to reach our Chief Privacy Officer.

## 2. Identifying Purpose

When we collect your Personal Information, we may use or disclose it to:

- verify your identity;
- provide and manage products and services you have requested;
- understand your financial services requirements;
- protect against fraud and manage risk;
- determine suitability of products and services for you;
- better manage your relationship with us;
- determine your eligibility for certain of our products and services, or products or services of others;

- comply with legal or regulatory requirements, or as otherwise permitted by law;
- communicate with you regarding products and services that may be of interest;
- understand our customers and to develop and tailor our products and services, and
- respond to any questions you may have.

If a new purpose for using your Personal Information develops, we will identify that purpose.

### 3. Consent and Your Choices

When you apply for a new product or service, we obtain your consent to collect, use or disclose your Personal Information for the purposes set out in Principle 2, Identifying Purpose.

If you prefer not to receive our Direct Marketing communications and/or not have your Personal Information shared among the members of BMO Financial Group for the purpose of marketing, you can have your name deleted from our Direct Marketing and/ or shared information lists. If you want to change your privacy preferences, see Contact Us.

Please note that you cannot withdraw your consent to the collection, use and disclosure of your Personal Information if:

- we are legally required to collect, use or disclose your Personal Information, or
- it relates to a credit product we have granted to you where we are required to collect and exchange your Personal Information on an ongoing basis with credit bureaus, credit insurers and other lenders.

Withdrawing your consent in certain situations may also mean that we may not be able to provide you with the products or services you request.

### 4. Limited Collection

We only collect the Personal Information that we determine we need for the purposes set out in Principle 2, Identifying Purpose.

For example, we may collect:

- **Contact Information** including address, telephone number and email address.
- **Social Insurance Number (SIN)** as required in order to comply with the Canada Revenue Agency's reporting requirements. You may provide your SIN to ensure an accurate match between your Personal Information and credit bureau information and to help us differentiate customers who may have the same or similar name.
- **Financial Information** to ensure that the advice and/or products we provide you are appropriate for you and the investments you purchase are suitable for you.
- **Device Information** such as information about your operating system, browser, software applications, IP address, geolocation, security status and other device information in order to improve your experience, to protect against fraud and manage risk.
- **Website Use Information** such as browsing behavior on BMO sites and links, location you click, form data and downloads as well as other data gathered from the use of web tools (for example, Cookies, Web Beacons, Tagging) to better understand your interests and needs so that we can serve you better. For more information, see our Online and Mobile Privacy Policy at [bmo.com/privacy](http://bmo.com/privacy).
- **Employment Information**, including information about your previous and current employers, to confirm your eligibility for certain products and services.
- **Health Information** as required for some of our insurance products.

We may collect Personal Information about you from you and from third parties or sources that are available to the public to satisfy legal requirements or regulatory expectations or to manage our risk and to help us understand our customers in order to develop and tailor our product and service offerings.

You can choose not to provide us with certain information in some situations, but if you make this choice, we may not be able to provide you with the product, service, or information you request.

We may monitor or record our incoming or outgoing telephone calls with you to ensure accuracy, security, service quality, for training purposes and to establish a record. If you do not wish to have your call recorded, you have other options to conduct business with us such as at one of our branches or ABMs, online, or by contacting us in writing.

We may use video surveillance in and around our branches, ABMs and other locations for the safety of our customers and employees, and to protect against theft, property damage and fraud.

## 5. Limited Use and Disclosure

We will only use or disclose your Personal Information for the purpose(s) it was collected and as otherwise identified in this Privacy Code. Personal Information may be released to third parties including legal or regulatory authorities in cases of suspected criminal activity or contravention of law, for the detection and prevention of fraud, or when required to satisfy the legal or regulatory requirements of governments, regulatory authorities or other self-regulatory organizations, or to comply with a court order or for the protection of our assets (for example, collection of overdue accounts).

We may share your Personal Information within BMO Financial Group, including locations outside of Canada where we do business, for legal and regulatory purposes, to manage credit risk and other business risks, to perform analytics, to ensure we have correct or up to date information about you (such as your current address or date of birth) and to better manage your relationship with us.

We may share your Personal Information within BMO Financial Group for the purpose of marketing, so that these companies can offer you a broader range of product and service solutions to meet your needs. You may withdraw

your consent to this use of your Personal Information as described in Principle 3, Consent and Your Choices.

We do not sell the names or other Personal Information of our customers. We do not disclose the names or other Personal Information of our customers to other companies outside of BMO Financial Group without consent unless required or permitted by law. Over time, we may buy new businesses or sell some of our businesses. Accordingly, Personal Information associated with any accounts, products or services of the business being purchased or sold will be transferred as a business asset to the new business owner. We may also transfer Personal Information as part of a corporate reorganization or other change in corporate control.

We may use affiliates or other companies to provide services on our behalf such as data processing, account administration, analytics and marketing. Such companies will be given only the Personal Information needed to perform those services and we do not authorize them to use or disclose Personal Information for their own marketing or other purposes. We have contracts in place holding these companies to the same standards of confidentiality by which we are governed. In some cases, these other companies may be located outside of Canada (such as in the United States) and may be required to disclose information to courts, government authorities, regulators or law enforcement in accordance with applicable law in that country.

## 6. Retention

We have policies in place that govern the retention of your Personal Information so it will be kept only for as long as reasonably necessary to fulfill its intended purpose or to satisfy legal requirements.

## 7. Accuracy

We are committed to maintaining the accuracy of your Personal Information and ensuring that it is complete and up-to-date. If you discover inaccuracies in our records, or your Personal Information changes, please notify the branch or office where you do business immediately so that we can make the necessary changes. Failure to notify

us of changes to your Personal Information may negatively impact the way we communicate or provide services to you. Where appropriate, we will advise others of any material amendments to your Personal Information that we may have released to them. If we do not agree to make the amendments that you request, you may challenge our decision as described in Contact Us.

## 8. Safeguards

We use physical, electronic and procedural safeguards to protect against unauthorized use, access, modification, destruction, disclosure, loss or theft of your Personal Information in our custody or control.

We have agreements and controls in place with credit bureaus, credit insurers, other lenders and third party service providers requiring that any information we provide to them must be safeguarded and used only for the purpose of providing the service we have requested the company to perform.

To learn more about our security controls, visit [bmo.com/security](http://bmo.com/security)

## 9. Openness

From time to time, we may make changes to this Privacy Code. The Privacy Code at [bmo.com/privacy](http://bmo.com/privacy) is always the most recent version.

Please see Contact Us to answer any questions you may have about our Privacy Code.

## 10. Individual Access

Requests to review or verify your Personal Information, or to find out to whom we have disclosed it, must be made to us in writing. The branch or office where you do business can assist you with the request. We will need specific information from you to enable us to search for, and provide you with, the Personal Information we hold about you. We may charge you a token fee depending on the nature of your request and we will advise you of any fee prior to proceeding with your request. If we are unable to provide some of the Personal Information we hold about you, we will tell you why. To request to review or verify your Personal Information, see Contact Us.

## Online and Mobile Privacy

For information about our online and mobile Personal Information practices, please see our Online and Mobile Privacy Policy at [bmo.com/privacy](http://bmo.com/privacy).

## Contact Us

If you have any questions or concerns about our privacy practices, the privacy of your Personal Information or you want to change your privacy preferences, please let us know.

## Talk to your Branch or Office

The branch or office where you do business can answer any questions you may have about our Privacy Code. If your concerns are not resolved, please involve the Manager/Supervisor. Alternatively, contact:

### BMO Bank of Montreal Customer Contact Centre

**Personal Call:** 1-877-225-5266

**TTY:** 1-866-889-0889

**Business Services Call:** 1-877-262-5907

**Visit:** [bmo.com](http://bmo.com)

### BMO MasterCard®\*

**Call:** 1-800-263-2263

**TTY:** 1-866-859-2089

**Visit:** [bmo.com/mastercard](http://bmo.com/mastercard)

### BMO Insurance®

**Call:** 1-866-881-9054

*For BMO Life Assurance products*

**Visit:** [bmoinsurance.com](http://bmoinsurance.com)

*For BMO Creditor Insurance products*

**Visit:** [bmo.com](http://bmo.com)

### BMO Nesbitt Burns®†

Contact your Branch Manager as indicated on your account statement

### BMO InvestorLine®

**Call:** 1-888-776-6886

**Email:** [info@bmoinvestorline.com](mailto:info@bmoinvestorline.com)

**Visit:** [bmoinvestorline.com](http://bmoinvestorline.com)

### BMO Private Banking

Contact your Regional Director. Please note that BMO Private Banking has Regional Directors for each of: Platinum Banking, Investments, and Wealth Services.

**Call:** 1-800-844-6442

**Visit:** [bmoprivatebanking.com](http://bmoprivatebanking.com)

## Escalate to a Senior Officer

If your concerns are unresolved after speaking with the branch or office where you do business, you may escalate to the appropriate business group Senior Officer, listed below:

### BMO Bank of Montreal

Office of the Regional Vice President (your local branch will have specific contact details)

**or**

Office of the President and Chief Executive Officer

Personal and Commercial Banking

BMO Financial Group

1 First Canadian Place

P.O. Box 1, Toronto, ON M5X 1A1

**Call:** 1-800-372-5111

**Fax:** 416-927-6658

### BMO MasterCard

Office of the Regional Vice President  
(your local branch will have specific contact details)

**or**

Office of the President and Chief Executive Officer

Personal and Commercial Banking

BMO Financial Group

1 First Canadian Place

P.O. Box 1, Toronto, ON M5X 1A1

**Call:** 1-800-372-5111

**Fax:** 416-927-6658

### BMO Insurance

Office of the President

BMO Life

60 Yonge Street, Toronto, ON M5E 1H5

**Call:** 1-866-488-2595

**Fax:** 1-866-698-2140

### BMO Nesbitt Burns

Vice President, Client Complaints

BMO Nesbitt Burns, Retail Compliance

1 First Canadian Place

P.O. Box 150, Toronto, ON M5X 1H3

**Call:** 1-866-391-5897

### BMO InvestorLine

Office of the Chief Compliance Officer

**or**

President and Chief Executive Officer

**or write to:**

BMO InvestorLine

Complaints Management Centre

1 First Canadian Place

100 King St West, 8th Floor, Toronto, ON M5X 1A1

### BMO Investments Inc.

Office of the Chief Compliance Officer

77 King Street West, Suite 4530

Royal Trust Tower, Toronto, ON M5K 1J5

**Fax:** 416-867-4015

### BMO Private Banking

National Director, Compliance

1 First Canadian Place

100 King St. West, 41st Floor, Toronto, ON M5X 1A1

### BMO Financial Group

Office of the President and Chief Executive Officer

1 First Canadian Place

P.O. Box 1, Toronto, ON M5X 1H3

## Escalate to BMO Financial Group Privacy Office

If your complaint remains unresolved after speaking to a Senior Officer, you may contact the Privacy Office at:

### BMO Financial Group

Office of the Chief Privacy Officer

1 First Canadian Place

P.O. Box 150, Toronto, ON M5X 1H3

Privacy.matters@bmo.com

If after contacting us you do not feel that we have adequately addressed your concerns, you may contact:

## The Office of the Privacy Commissioner of Canada

**Call:** 1-800-282-1376

**Visit:** [www.priv.gc.ca](http://www.priv.gc.ca)



We're here to help.™

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<sup>1</sup> **BMO Financial Group** means Bank of Montreal and its affiliates that provide deposit, investment, loan, securities, trust, insurance and other products and services.

<sup>2</sup> **Personal Information** is information about an identifiable individual. It includes information that you have provided to us or was collected by us from other sources. It may include details such as your name and address, age and gender, personal financial records, identification numbers including your Social Insurance Number, personal references, and employment records.

<sup>3</sup> **Direct Marketing** is our communication with you such as mail, telemarketing or email, using the contact information you have provided, to inform you about products and services that we think may be of interest and value to you. This does not include communications regarding products or services that you currently have, including improved ways to use the products, or additional features of the products as well as transactional information.

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