

# Privacy Policy

## **IMPORTANT NOTE ABOUT YOUR PRIVACY**

At TRU Lending, your privacy and how you are treated in that regard is paramount. Should you receive any inappropriate and/or questionable solicitation from someone you feel is misrepresenting themselves as a TRU Lending mortgage professional please notify us on our email.

At TRU Lending we are committed to maintaining the accuracy, security and privacy of the personal Information submitted to us by our clients and others with whom we do business (hereinafter collectively referred to as “you”), in accordance with applicable legislation. This Privacy Policy is a statement of the principles and guidelines we apply with respect to your personal information.

## **Consent**

BY SUBMITTING PERSONAL INFORMATION TO TRU Lending, OR TO ANY OF OUR ASSOCIATED BROKERAGES OR STAFF, YOU AGREE THAT WE MAY COLLECT, USE AND DISCLOSE SUCH PERSONAL INFORMATION IN ACCORDANCE WITH THIS PRIVACY POLICY AND AS PERMITTED OR REQUIRED BY LAW.

You may refuse or withdraw your consent at any time by contacting the TRU Lending office. If you refuse or withdraw your consent, we may not be able to provide, or continue to provide, our services to you.

We will rely, unless you specifically advise us to the contrary in writing at the time, upon your personal representation that you have all necessary authority and/or have obtained all necessary

consents to enable us to collect, use and disclose any personal information of another individual which you may provide to us, for all purposes permitted by this Privacy Policy.

### **What Personal Information do we collect?**

Canadian privacy legislation defines “personal information” very broadly. Generally speaking, it will be information which:

is about an identifiable individual; or allows an individual to be identified; and in either case, is not information which is already “public” according to exceptions set forth in the applicable legislation.

In this policy, our use of the term “Personal Information” means information which is defined as being personal information under the applicable Canadian privacy legislation, and which is not exempted under such legislation.

Generally speaking Personal Information does not include what is considered business contact information: your name, title or position, business address, telephone number, facsimile number, or e-mail address. Certain information, such as your name, home address and telephone number, may be exempted under your provincial legislation. In addition to this information, we may also collect your personal email address, income and employment information, asset, liability and net worth information, and other information which is necessary for us to gather in connection with an application, pre-approval, or request for information concerning mortgages, loans or other products or services purchased or applied for through TRU Lending or any of our sub-mortgage brokers (including Personal Information about family members, beneficiaries, directors, officers, employees, potential guarantors and other relevant parties).

From time to time we conduct remarketing campaigns using Google Analytics. In doing so, we collect the email address of visitors to some of our websites; specifically the addresses of those who communicate with us through on-line forms and registration forms. The information we collect is used to improve the content of our websites and contact visitors for marketing purposes. With respect to cookies, as part of periodic remarketing campaigns, we use cookies to store visitors preferences, record user-specific information on what pages users access or visit, alert visitors to new areas that we think might be of interest to them when they return to our site, record past activity at a site in order to provide better service when visitors return to our site and to customize web page content based on visitors' browser type or other information that the visitor sends. If you do not want to receive email from us in the future, please let us know by sending us an email at the above address. Persons who supply us with their telephone numbers on-line will only receive telephone contact from us with information pertaining to their original reason for data submission.

### **Why do we collect your Personal Information?**

As financial service providers, we have a professional obligation to maintain in confidence information we receive within our role as a financial services provider, and nothing in this Privacy Policy is intended to limit our common law obligations to you.

In general, TRU Lending collects, uses and discloses Personal Information about you in order to provide you with mortgage brokerage and related services. We may also use your Personal Information to assess whether other products or services may be of interest to you and communicate with you about those opportunities.

- Providing mortgage brokerage services to you and offering products and services best suited to your needs, including arranging and/or renewing loan(s)/mortgage(s) and informing you of group creditor insurance and other products offered or approved by us or by lenders or other parties with whom we have business relationships and which may be of interest to you;
- Checking your credit-worthiness through credit bureau inquiries and personal information agents who have information on your financial position;
- Advising you of your financial options, as well as ongoing developments within the mortgage market and industry;
- Auditing the services provided to our clients;
- Complying with all municipal, provincial, federal and other applicable laws;
- Any specific purposes which are communicated to you prior to the collection of such Personal Information; and
- Any other purpose to which you consent.

Except when otherwise permitted by law, we will only use your Personal Information for the purposes identified to you, either in this Policy or directly by TRU Lending or one of its sub-mortgage brokers. When Personal Information is to be used for a purpose not identified, we will take all reasonable steps to ensure that the new purpose is identified and consented to you prior to such use.

### **To whom do we disclose your Personal Information?**

From time to time, TRU Lending may disclose your Personal Information to:

- prospective lenders, financial institutions, insurance companies and other suppliers of products or services TRU Lending is providing or offering to you;
- sub-mortgage brokers and other staff within TRU Lending and its sub-mortgage brokerages for purposes related to the services we are providing to you;
- service providers, including organizations or individuals we have retained to perform functions on our behalf, such as office and registry services;
- organizations or individuals retained by us to evaluate your creditworthiness or to collect debts outstanding on an account;
- a person who, in the reasonable judgment of TRU Lending, is providing or seeking the information as your agent or who is otherwise legally entitled to receive that information;
- police or other authorities where in TRU Lending's opinion such disclosure is required for protection of the public interest, including any case where we suspect criminal activity such as fraud or money laundering;
- any law firm(s) which may be retained to act on our behalf for any reason;
- our insurers and to regulatory agencies such as provincial financial institutions commissions or others in connection with regulatory or other activities relating to our obligations and/or our mortgage brokerage businesses; or
- any third party or parties, where you consent to such disclosure or where disclosure is required or permitted by law.

As many of our dealings with lenders and other parties are conducted through electronic means of communication, you specifically consent to our transmission of your Personal Information by electronic means, including by email and facsimile transmission, for all purposes identified in this Policy or otherwise consented to by you.

### **Where do we store your Personal Information?**

Your Personal Information is stored in secured locations and on computers and computer servers controlled by TRU Lending or its sub-mortgage brokers, located either at our offices. Once a file or matter has been completed, paper records may be stored in off-site storage facilities, and are subject to destruction after such reasonable period of time as TRU Lending determines is appropriate to meet the requirements of any applicable regulatory bodies and/or any other applicable laws or regulations, statutory or otherwise, from time to time.

### **How may you obtain access to your Personal Information?**

Upon your written request, TRU Lending will inform you of the existence, use, and disclosure of all of your Personal Information which we have in our possession and will give you access to that information. Access requests should be sent to our office email.

### **How do we protect your Personal Information?**

To help protect the confidentiality of your Personal Information, TRU Lending employs administrative and technological safeguards appropriate to the sensitivity of your Personal Information.

While the processes which are employed by the various third parties with whom we deal for protecting Personal Information are established by those third parties, TRU Lending will not continue to deal with any third party where we have actual notice of a

failure by that third party to adequately safeguard your Personal Information.

We endeavor to operate secure data networks protected by industry standard firewall and password protection systems.

### **Changes to the Privacy Policy**

TRU Lending reserves the right to modify or supplement this Privacy Policy at any time. If we make a change to this Privacy Policy, we will post such changes on our website (<http://www.trulending.ca/>) and make such revised policy and changes available upon request to our office.