



Personal Information  
Client Information  
Employee Information  
Applicant Information

## MUFG BANK, LTD., CANADA BRANCH

## Privacy Notice

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### (I) MUFG and MUFG Bank Canada

Mitsubishi UFJ Financial Group is one of the world's leading financial groups (collectively, "MUFG"). MUFG is headquartered in Tokyo and has a global network that includes approximately 2,300 offices in nearly 50 countries. MUFG provides access to commercial banking, trust banking, securities trading services, credit cards, consumer banking and finance, asset management, leasing, and other services. The banking business of MUFG is conducted predominantly through MUFG Bank, Ltd., a Japanese bank.

MUFG Bank, Ltd., Canada Branch ("MUFG Bank Canada") is an authorized foreign bank branch of MUFG Bank, Ltd. established on pursuant to the *Bank Act* (Canada).

### (II) Global Privacy Policy

MUFG believes it is our social responsibility to handle customer's personal information, individual numbers and specific personal information properly under MUFG Group Corporate Vision. Accordingly, as a branch of MUFG Bank, Ltd., and a member of MUFG, MUFG Bank Canada adheres to the MUFG MUFG Personal Information Policy, accessible at: <http://www.bk.mufg.jp/global/privacy/index.html>

### (III) Canadian Privacy Laws

Each entity within MUFG globally is subject to different regulatory requirements, depending on, among other things, the products it offers and the jurisdictions in which it operates.

As a Canadian federally regulated financial entity, MUFG Bank Canada must comply with the *Personal Information Protection and Electronic Documents Act* ("PIPEDA") regarding its collection, use and disclosure of any information about an identifiable individual ("Personal Information"). PIPEDA describes ten (10) overarching privacy principals, which are summarized as follows:

- (i) Accountability: Organizations must appoint an individual to be responsible for the organization's compliance and to develop and implement Personal Information policies and procedures. Organizations are accountable for Personal Information transferred to third-party service providers (including affiliated companies) for processing on their behalf, and must use contractual or other means to protect Personal Information while being handled by those third parties.
- (ii) Identifying Purposes: Organizations must identify the purposes for collecting Personal Information before or at the time of collection. This should be interpreted in light of the Reasonableness Standard.
- (iii) Consent: Knowledge and consent of the individual are required for collection, use and disclosure of Personal Information, with limited statutory exceptions. Consent cannot be made a condition for supplying a product or service unless use of the Personal Information is required to fill an explicitly specified and "legitimate" purpose. Individuals may withdraw their consent at any time, subject to contractual or statutory limitations.
- (iv) Limiting Collection: Organizations are required to limit collection to the amount and type of information necessary for the identified purposes. Information must be collected by "fair and lawful means," and cannot be collected indiscriminately.
- (v) Limiting Use, Disclosure and Retention: Personal Information may not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or pursuant to certain limited statutory exceptions. Personal Information is to be retained only as long as necessary for the fulfilment of those purposes.

- (vi) Accuracy: Personal Information must be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.
- (vii) Safeguards: Organizations must use appropriate security safeguards to protect Personal Information against loss or theft, and unauthorized access, disclosure, copying, use or modification, and must train staff on security and information protection, among other matters.
- (viii) Openness: Privacy policies and practices of the organization must be open, understandable and easily available.
- (ix) Individual Access: Organizations must give individuals access to their Personal Information upon request, subject to certain statutory limits and, in appropriate circumstances, individuals must be given an opportunity to correct their information.
- (x) Challenging Compliance: Organizations must have a simple and easily accessible procedure for monitoring compliance.

#### **(IV) MUFG Bank Canada's Privacy Practices:**

##### **a. Client Information – Collection, Use and Disclosure**

MUFG Bank Canada obtains information regarding its Clients ("Client Information"). While the information obtained varies depending on the size, operations, sophistication and structure of a Client, Client Information may include:

- (i) Information obtained to verify a Client's identity (including its employees, officers, directors, authorized signatories and beneficial owners) which may include Personal Information
- (ii) Information regarding a Client's past, current and future affairs with MUFG or other counterparties, including information delivered to, or processed through, MUFG and all records pertaining to the relationships under a Client's name involving MUFG or another counterparty, as well as about a Client's point of contact with MUFG;
- (iii) Transactional and product information such as credit and debit balances, payment records, copies of cheques, instructions, such as information on foreign exchange transactions, loans, hedge or other derivative transactions; and
- (iv) Documentation regarding a Client relating to the services offered by MUFG, including agreements, statements, confirmations, invoices and other instruments creating contractual rights and obligations between MUFG Bank Canada and Client, as well as, other documentation delivered to MUFG during the Client relationship.

To best serve its clients, where a Client wishes to establish a relationship with another entity or branch within MUFG (each a "MUFG Affiliate"), MUFG Bank Canada may obtain Client Information as agent for such MUFG Affiliate for these same purposes.

MUFG Bank Canada uses and discloses Client Information (including Personal Information) to, among other things: (i) establish and maintain a relationship with a Client; (ii) provide a Client with a product or service; (iii) comply with all applicable laws and regulations, including but not limited to the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (Canada) and including those applicable to a MUFG Affiliate, such as the requirements of Financial Crimes Enforcement Agency (United States) (which may include checking identity against watch lists established by regulatory agencies and similar bodies in Canada and foreign countries); (iv) to detect and prevent fraud and other unlawful activity; (v) to collect a debt that is owed to it; (vi) to fulfil legal, regulatory and self-regulatory requirements (which may include reporting to Canadian and foreign governmental agencies); (vii) for other purposes with consent or as permitted or required by law (including foreign laws applicable to our affiliates and service providers); and (viii) in connection with an actual or proposed sale, assignment, financing or transfer of our business or assets. Where MUFG Bank Canada collects Client Information as agent for a MUFG Affiliate, such MUFG Affiliate will use and disclose Client Information (including Personal Information) for these same purposes, subject to applicable law and its own regulatory requirements.

Subject to applicable law, MUFG Bank Canada may share Client Information (including Personal Information) with MUFG Affiliates and service providers as necessary for the purposes described above. Some of these MUFG Affiliates and service providers are located outside of Canada.

***b. Employee Information – Collection, Use and Disclosure*<sup>1</sup>**

MUFG Bank Canada obtains information (“Employee Information”) regarding individuals (each an “Employee”) under full-time or part-time employment with MUFG Bank Canada as well as certain contractor and consulting relationships. While the information obtained varies, Employee Information may include personal information such as an Employee’s age, name, social insurance number, identification numbers, home address, home telephone number, income, evaluations, banking account information, securities account information, and employee benefits and group insurance information (including medical information).

MUFG Bank Canada will collect and use Employee Information for a variety of purposes (collectively, the “Purposes”), including without limitation to: (i) administer the terms of an employment agreement (including remuneration), (ii) administer all related benefits and group insurance programs, (iii) determine an Employee’s continued eligibility and suitability for employment with, or to otherwise perform services for, MUFG Bank Canada, (iv) evaluate an Employee’s references and qualifications, (v) perform credit checks, (vi) provide training and development, (vii) conduct performance evaluations, investigations, or disciplinary measures, (viii) comply with applicable laws, regulations and regulatory guidance with respect to an Employee’s employment, (ix) ensure MUFG Bank Canada is complying with applicable laws, regulations and regulatory guidance with respect to its operations and activities, and (x) comply with internal policy requirements of MUFG Bank Canada (including those relating to use of MUFG Bank Canada’s technology resources (the “Technology Resources”).

MUFG Bank Canada will collect Employee Information through a variety of channels (the “Collection Methods”), including: (i) within an Employee’s file, (ii) with respect to its administration of an Employee’s employment with MUFG Bank Canada (including with respect to performance tracking, benefits and group insurance processing, and payroll), (iii) in connection with its monitoring of an Employee’s performance and productivity, (vi) in connection with its monitoring an Employee’s use of the Technology Resources; (iv) in connection with its monitoring of an Employee’s compliance with the internal policy requirements of MUFG Bank Canada; (v) in connection with its monitoring of MUFG Bank Canada’s compliance with applicable laws, regulations and regulatory guidance; and (vi) through its review of publicly available mediums (including social media platforms).

MUFG Bank Canada may disclose Employee Information within the global operations of MUFG as well as to other third parties as required or permitted by applicable laws, regulations and regulation guidance in connection with the Purposes and/or the Collection Methods. Where such Employee Information is disclosed within the global operations of MUFG or to a third party, Employee Information will be maintained or accessed in jurisdictions outside of Canada. In such circumstances, MUFG Bank Canada is obligated to do so in accordance with applicable law, regulation and regulatory guidance, including PIPEDA. MUFG Bank Canada will not sell, license, share or otherwise disclose any Employee Information to any third party for commercial purposes.

***c. Applicant Information – Collection, Use and Disclosure (including Digital Properties)*<sup>2</sup>**

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<sup>1</sup> MUFG Bank Canada is an equal opportunity employer. MUFG Bank Canada does not discriminate in hiring or in any other aspect of employment on the basis of the grounds enumerated in the Canadian Human Rights Act. In addition, MUFG Bank Canada complies with applicable laws prohibiting discrimination in employment in every jurisdiction in which it maintains offices. MUFG Bank Canada provides accommodation to individuals in accordance with the requirements outlined in the Canadian Human Rights Act and the Canada Labour Code.

MUFG Bank Canada obtains information (“Applicant Information”) regarding individuals (each an “Applicant”) who are applying for full-time or part-time employment with MUFG Bank Canada as well as certain contractor and consulting relationships. This collection may include information which an Applicant provides through or in connection with submissions made by the Applicant which utilize MUFG websites (“Sites”) and portals (“Portals”) (collectively, the “Digital Properties”).

While the information obtained varies, Applicant Information may include personal information such as an Applicant’s: (i) Contact information, including name, home address, home telephone, mobile telephone and email address; (ii) Login credentials, such as user name and password and security questions and answers; (iii) Education or professional history and other information you provide to us such as in a resume, cover letter or interview; (iv) Citizenship and eligibility or right to work; (v) Interest in employment opportunities; (vi) Job specific questions that relate to an Applicant’s fitness for a particular position; (vi) Geolocation information; (vii) Information regarding potential conflict of interest issues; and; (viii) Demographic information, such as age, nationality, date of birth, race, ethnicity, sex, gender and military or veteran status. This information is purely voluntary and an Applicant’s decision to provide or withhold any of that information will not negatively impact whether or how MUFG Bank Canada will consider an Applicant for employment.

MUFG Bank Canada will collect and use Applicant Information for a variety of purposes in connection with evaluating an Applicant’s eligibility and suitability for employment with MUFG Bank Canada and, if successful, to communicate with such Applicant with respect to employment opportunities and to negotiate and enter into agreements with an Applicant to make them an Employee. This might include to evaluate an Applicant’s references and qualifications, perform credit checks, to comply with applicable laws, regulations and regulatory guidance with respect to an Applicant’s prospective employment with MUFG Bank Canada and to comply with internal policy requirements of MUFG Bank Canada.

MUFG Bank Canada may disclose Applicant Information within the global operations of MUFG as well as to other third parties as required or permitted by applicable laws, regulations and regulation guidance in connection purposes described above. Where such Applicant Information is disclosed within the global operations of MUFG or to a third party, Applicant Information will be maintained or accessed in jurisdictions outside of Canada. In such circumstances, MUFG Bank Canada is obligated to do so in accordance with applicable law, regulation and regulatory guidance, including PIPEDA. MUFG Bank Canada will not sell, license, share or otherwise disclose any Applicant Information to any third party for commercial purposes.

#### ***a. Applicant Information – Additional Information Regarding Digital Properties***

Please note that the Digital Properties are only intended for use by individuals who are 18 years of age or older. If a potential Applicant is not 18 years of age or older, or if any person believe an individual under the age of 18 may have provided MUFG Bank Canada with personal information, contact us using the contact information provided below.

With respect to Digital Properties, when any person visits MUFG’s Sites and Portals, MUFG may obtain certain information by automated means, such as cookies, web beacons, web server logs and other technologies. A “cookie” is a text file that websites send to a visitor’s computer or other internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. A “web beacon,” also known as an internet tag, pixel tag or clear GIF, links web pages to web servers and cookies and may be used to transmit information collected through cookies back to a web server. MUFG may use these automated technologies on the Digital Properties to collect information

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about an Applicant's equipment, browsing actions, and usage patterns. These technologies help MUFG (1) remember an Applicant's information so an Applicant does not have to re-enter it; (2) track and understand how an Applicant uses and interacts with the Digital Properties; (3) tailor the Digital Properties around Applicants' preferences; (4) measure the usability of the Digital Properties and the effectiveness of MUFG's communications; and (5) otherwise manage and enhance MUFG's products and services, and help ensure such products and services are working properly. An Applicant's browser may tell the Applicant how to be notified about certain types of automated collection technologies and how to restrict or disable them. Please note, however, that without these technologies, an Applicant may not be able to use all of the features of the Digital Properties.

Information which an Applicant provides through the Digital Properties will be accessible outside of Canada and by affiliates of MUFG Bank Canada.

***b. Protection of Client Information, Employee Information and Applicant Information***

MUFG Bank Canada affirms it shall treat all Client Information, Employee Information and Applicant Information which it collects, either on its own behalf or as agent for a MUFG Affiliate, as confidential and in accordance with applicable law, including PIPEDA.

**(V) Access to Personal Information and Challenging Compliance**

MUFG Bank Canada has established policies and procedures to receive, investigate and respond to Client, Employee, and Applicant complaints and questions. MUFG Bank Canada will employ every effort to achieve an amicable resolution to all complaints filed so that the issue does not recur. For more information on the complaint handling practices of MUFG Bank Canada, please visit our website at: <http://www.bk.mufg.jp/global/globalnetwork/americas/toronto.html>

Clients, Employees, and Applicants may access their Personal Information held by MUFG Bank Canada. Clients, Employees, and Applicants may also make other inquiries regarding MUFG Bank Canada's collection, use and disclosure of their Personal Information. Notwithstanding the standard complaint handling practices of MUFG Bank Canada, Clients, Employees, and Applicants may make any request or inquiries in writing addressed to:

Chief Privacy Officer  
MUFG Bank Ltd., Canada Branch  
Royal Bank Plaza, South Tower Suite 1800  
200 Bay Street Toronto, ON M5J 2J1  
Telephone 416-865-0220

If a Client's, Employee's, or Applicant's concern is not resolved to complete satisfaction those concerns may be reviewed by the Office of the Privacy Commissioner, by contacting the Commissioner in writing to:

Office of the Privacy Commissioner of Canada  
30 Victoria Street, Gatineau, Quebec, K1A 1H3  
Toll-free: 1-800-282-1376  
Phone: 819-994-5444  
TTY: 819-994-6591  
Internet: [www.priv.gc.ca](http://www.priv.gc.ca)

Clients, Employees, and Applicants may contact the Privacy Commissioner at any time during the resolution process.