



# COLLECTION AND TRANSFER OF PERSONAL INFORMATION TO SERVICE PROVIDERS OUTSIDE CANADA (“OUT OF CANADA SERVICE PROVIDERS STATEMENT”)

## Our Privacy Commitment

ATB Financial<sup>1</sup> is committed to making sure that your personal information is protected.<sup>2</sup> You may find this commitment by ATB in our *Privacy Statement and Code*, which is available on our website at [atb.com](http://atb.com), or you may obtain a copy from any of our branches.

This *Out of Canada Service Providers Statement* (the “Statement”) sets out why we provide your personal information to our third party service providers outside of Canada, and lists the country or countries where client or team member personal information may be processed or stored.

## What is Personal Information?

Personal information is any information that identifies you as an individual. Some examples of personal information include your name, home address, contact information (personal cellular phone and email), date of birth, gender, social insurance number (SIN), driver’s licence number, credit history, and your account and other financial information.

Under the *Personal Information Protection Act*, Alberta, personal information includes ‘Personal Employee Information’. Personal Employee Information is information that may be required by ATB Financial to commence, maintain, or end an employment relationship.

Personal information excludes an individual’s business contact information such as name, position or title; and business telephone number, address, e-mail, fax number and other business information used solely to contact an individual regarding a business.

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<sup>1</sup> ATB Financial, its agents, and its wholly owned subsidiaries, including ATB Securities Inc., ATB Investment Management Inc., ATB Insurance Advisors Inc., and ATB Capital Markets Inc. are hereinafter collectively referred to for the purposes of this Out of Canada Service Providers Statement as “ATB Financial”.

<sup>2</sup> For the purposes of this *Out of Country Service Providers Statement*, “you” and “your” refer to an individual obtaining products and/or services from ATB Financial, and “us”, “we”, and “our” refer to ATB Financial.



## Collecting and Transferring your Personal Information to Service Providers outside Canada

As part of our standard business operations, we ensure access to your personal information is restricted on a need to know basis and internally to ATB Financial. Our business and delivery of financial services requires that we sometimes contract with service providers outside Canada to carry out certain functions on our behalf such as data processing and back-up. In such situations, we enter into contracts with our service providers and they cannot disclose your personal information except where authorized by law or ATB Financial. Currently, we have entered into contracts with service providers outside Canada to provide the following services to ATB Financial:

S/N	Country	Purpose
1)	United States	ATB uses a service provider in the United States to process bill payments by customers and employees. The service provider backs up the processed data in the United States.
2)	United States	ATB uses a service provider to process domestic and international wire transfers. The service provider or correspondent bank may use, transfer or retain personal information in the United States required to send and receive wire transfers.
3)	United States	ATB uses a service provider in the United States to process Foreign Exchange, Commodity or Interest Rate Swap trading and settlement.
4)	United States, Germany, Netherlands	ATB uses a service provider in the United States for managing ATB team member employment information, learning activities, and attendance and payroll information.
5)	United States	A service provider in the United States collects and uses customer information required to provide personal financial management services.
6)	United States	A service provider collects client's personal information for the purpose of adding a payment card to a mobile wallet application.
7)	United States	A service provider in the United States collects and uses customer information to help ATB better understand customer needs.
8)	Ireland	A service provider collects ATB customer information for research purposes and stores the information in Ireland as back-up to similar information already stored in Canada.



9)	United States	ATB uses a service provider in the United States to support industry standard identity and access management that will allow a client to seamlessly move between applications with common credentials.
10)	United States	ATB uses a service provider in the United States to process and store electronic records and related electronic signatures which allow clients to go paperless.
11)	United States and South Korea	A service provider collects client's personal information for the purpose of adding a payment card to a mobile wallet application.
12)	United Kingdom, United States, Costa Rica	ATB uses a service provider which stores data in different locations. The service provider captures information about ATB to complete an organizational study to determine industry best practices.
13)	United States, Chile, Belgium, Ireland, Denmark, Finland, Netherlands, Singapore, Taiwan, Germany, United Kingdom, India, Brazil, Australia, Japan	ATB uses service providers for computing infrastructure services that provide online services for ATB communication, collaboration, email, data analytics, data storage and document storage.
14)	United States	ATB uses a service provider that stores information in the United States. The service provider's tool is used to approve expenses, reconcile cardholders transactions, and generate reports.
15)	United Kingdom and United States	ATB uses a service provider which stores call center and enterprise telephony system information.
16)	Ireland	ATB uses a service provider which provides enterprise content management services who stores customer information in Ireland.
17)	United States	ATB uses service providers in the United States as a CRM platform to manage ATB customer and account investment related details. The service provider allows the tracking, management and maintenance of current and historical customer and account information with a focus on improving customer service relationships.
18)	United States	ATB uses a service provider in the United States to create new web-based applications, solutions, tools and storage for client information at ATB.
19)	United States	ATB uses a service provider to manage some of the HR services including recruitment, onboarding, time management and payroll.



20)	United States	ATB's Digital offering uses a service provider in the United States to validate users via SMS during onboarding and for fraud prevention.
21)	United States	ATB's Digital offering uses a service provider in the United States to provide fraud monitoring, detection, and prevention.
22)	United States	ATB Financial uses a third party application to monitor customer transaction activity for fraud monitoring and compliance with regulatory requirements.
23)	United States	ATB uses a service provider with data stored in the United States for event management, logging, monitoring and alerting.
24)	United States	ATB uses a service provider in the United States for Data Loss Prevention (DLP) and internet access security.
25)	Ireland	ATB uses a service provider to process delivery reports containing personal information that can be used to determine sanctioned email services and identify misconfigurations to ensure email services are in full compliance.
26)	Ireland	ATB uses a service provider to manage emails that are flagged as phishing/spam and automated reporting.
27)	United States and India	ATB has engaged a service provider for recruiting, onboarding, and career development as part of its integrated talent management system.
28)	United States	ATB uses a service provider to manage subscription lists for various publications, marketing campaigns or notification of account related information to our clients.
29)	United States, Australia, England, Singapore, Costa Rica, New Zealand, India, Mexico, Pakistan, Philippines	ATB engages a vendor based out of the United States to manage employee time and attendance.
30)	United States	ATB engages a service provider in the United States to provide SWIFT Bureau Services to help facilitate its wire transfer operations.
31)	United States	ATB engages a vendor in the United States to support investment funds administration and trust accounting.
32)	United States	ATB engages a vendor to provide financial software relating to over-the-counter (OTC) derivatives, foreign exchange (FX), and risk management.
33)	United States	ATB engages a service provider to support ABM services and debit card processing.
34)	United States, United Kingdom, Australia	ATB uses a service provider as part of its loan origination application portal.



35)	United States	ATB uses a service provider for telephony services and digital call management.
36)	United States	ATB uses a service provider to facilitate team member volunteerism, fundraising and donations; and Sponsorship & Donation intake and management process.
37)	Ireland	ATB engages a vendor to provide wealth management and portfolio management services.
38)	United States and Ireland	ATB uses a service provider for digital identity management and authentication solutions.
39)	United States	ATB uses a service provider that offers identity verification and fraud prevention services.
40)	United States and United Kingdom	ATB uses a service provider that provides a range of financial services, including banking, lending and investment solutions.
41)	United States	ATB engages a vendor that provides unique identifiers and descriptive data for financial instruments.
42)	United States	ATB uses a service provider that provides human capital management solutions, offering a platform for payroll, workforce management, and talent management.
43)	United States	ATB engages a vendor that provides data governance and data cataloging solutions.
44)	United States	ATB uses a vendor for professional services and contract labour related to business operations and customer relations applications.
45)	United States	ATB engages a vendor that provides software solutions designed to enhance text editing, file comparison, and code development.
46)	United States	ATB uses a service provider that provides cybersecurity services, including threat intelligence.
47)	United States	ATB engages a vendor that offers wealth management technology and reporting solutions.
48)	United States	ATB uses a service provider that provides blockchain analytics and compliance solutions.
49)	United States	ATB engages a vendor that offers identity and access management solutions.
50)	United States	ATB uses a service provider that provides data visualization and business intelligence solutions.
51)	United Kingdom	ATB engages a vendor that offers business intelligence and media monitoring services.
52)	United States	ATB engages a vendor that provides cybersecurity and security consulting services.
53)	United States	ATB engages a vendor that provides a governance, risk, and compliance (GRC) solution with capabilities including third party risk management, customer management, and employee code of conduct.



54)	United States	ATB uses a service provider that provides customized promotional merchandise and branding solutions.
55)	United States	ATB engages a vendor that provides graph database solutions to enable enhanced data insights, analytics, and data management.
56)	United States	ATB uses a service provider that provides risk management and data analytics services.
57)	United States	ATB uses a service provider that provides investment and risk management software and technology solutions.
58)	United States	ATB uses a service provider that provides workplace management software solutions.
59)	United States	ATB uses a services provider that provides cybersecurity training and education services.
60)	United States	ATB engages a vendor that provides investment research and financial data analytics services.
61)	United States	ATB engages a vendor that provides financial information services.
62)	United States	ATB uses a service provider that provides real estate valuation and appraisal management services.
63)	United States	ATB engages a vendor that offers a range of financial services and software solutions including investment management, risk and compliance, and operational services.
64)	United States	ATB uses a service provider that provides electronic trading and order management solutions.
65)	United States	ATB engages a vendor that provides a secure cobrowsing solution allowing real-time collaboration and assistance for enhanced customer support.
66)	United States	ATB engages a vendor that provides secure and automated network control solutions.
67)	United States	ATB engages a vendor that provides consulting services specializing in risk management.
68)	United States	ATB uses a service provider that offers an employee performance management platform.
69)	United States	ATB engages a vendor that provides cloud-based enterprise service management solutions including IT service management, workflow automation, and employee service experiences.
70)	United States	ATB uses a service provider that provides electronic payment solutions and financial services to facilitate digital transactions.
71)	India, United States, and United Kingdom	ATB engages a vendor that provides managerial consulting services.
72)	United States	ATB uses a service provider based in the United States that provides cheque image processing services.



We ensure that the above service providers meet our stringent privacy standards before we enter into contracts with them. We also require them to secure and maintain confidentiality over your personal information. We only provide the personal information that is required to perform the services requested by us.

We have in place different security safeguards such as organizational, contractual, and technological measures to protect your personal information from loss, unauthorized access, or disclosure.

ATB Financial is committed to making sure that your personal information is kept confidential and has prepared this Statement to serve you better. Should you require more information about the collection or transfer of your personal information to service providers outside Canada, you may write ATB Financial's Privacy Officer at:

**ATB Financial Privacy Officer**

#2100, 10020 – 100 Street,

Edmonton, Alberta T5J 0N3

By email: [PrivacyOfficer@atb.com](mailto:PrivacyOfficer@atb.com)

You may also contact ATB Financial Client Care toll-free at: 1-800-332-8383