

TD Privacy Policy

Thank you for trusting us with your information. This Privacy Policy explains how, and why, the TD Bank Group (TD) handles your personal information.

You agree to this Privacy Policy when you:

- apply for or use any TD product or service offered in Canada
- use any of our Canadian websites and mobile apps and
- otherwise interact with us

This Privacy Policy will apply:

- when you ask to begin a relationship with us
- during the course of our relationship and
- for a period of time after the end of our relationship

We may give you additional privacy terms for a product or service when you sign up for or use that product or service.



In this Privacy Policy:

The words "**TD**", "**we**", "**us**" and "**our**" mean TD Bank Group.

TD Bank Group includes The Toronto-Dominion Bank and its subsidiaries around the world around the world which offer financial products or services. This includes deposit, investment, loan, securities, trust and insurance products and services.

The words "**you**" and "**your**" means:

Anyone who applies for or uses any product or service offered by us in Canada. This includes individuals and representatives of legal entities such as corporations and partnerships. This also includes:

- the authorized representatives of individuals and legal entities
- anyone who provides a guarantee for any product or service
- a legal guardian of an applicant, user or customer
- individuals carrying on business alone or in partnership with other individuals
- signing officers of business customers
- Individuals who visit our websites
- Individuals who are directed to our Privacy Policy as part of the terms and conditions of any TD product

The word "**information**" means your personal information.



Choices: We rely on your consent to collect, use, retain, and share your information. This Privacy Policy outlines your options, where available, to refuse or withdraw your consent. Look for the checkmark symbol to spot the choices you can make.

Also, when you apply for or use a new product or service, we will tell you in the application or agreement which information is optional for you to provide.

WHY & HOW WE COLLECT YOUR PERSONAL INFORMATION

Beginning & maintaining a relationship with us

We need to collect certain information about you to provide our products and services. This may include your contact information, information about whether you are eligible for our products and services and records that reflect our overall relationship with you. We may also need other information depending on the product or service we're providing.

Information We Collect From You

The information we may collect includes:

Contact information such as your:

- name
- phone number
- preferred language
- address
- email address

Background information such as your:

- date of birth
- financial information
- Social Insurance Number (SIN)
- in some cases, information about your spouse, family or household members
- occupation and employer
- identification

Information to help confirm your identity and protect your accounts, such as your:

- signature samples
- mobile phone number
- device usage behaviour (such as keystroke patterns), IP address, third party verification or background details, and images
- Biometric information (such as voiceprint recording) where you have chosen to provide it to us
- answers to security questions
- device identifiers

Information that reflects your dealings with us, and through us, such as your:

- account or credit card transactions
- records of inquiries by phone, online or in person

Information you give us about others, such as:

- your spouse, family and household members
- your Trusted Contact Person¹
- parties to contracts

Other information about your relationship and interactions with us, such as your personal preferences and what products and services you have with us.

Details about the ways you interact with us, such as:

- how you use our websites, mobile apps and phone services
- the devices you connect from and their settings, including:
 - geolocation (if enabled on your device)
 - contact list (with your express consent)
 - photos that you submit,
 - country code,
 - IP address-associated location
 - date and time of your use

See the "**Interacting with TD online**" section below for more details on information we collect through our websites and mobile apps.

To meet government tax reporting obligations, we need your SIN for products that generate interest or investment income. For all other products and services, it is your choice whether you give us your SIN. You can make this choice when you fill out forms that request your SIN or when you meet with a TD advisor.



In some cases you have a choice about what information to give us. For example, you can choose if you want to give us your voiceprint for telephone banking services or your preferred mailing address. We may ask you for consent in these cases when you first apply for a product or service or when you first use a channel such as telephone banking or a mobile app.



If you don't want to have your call recorded, you can let us know and we can provide you with other options for most services. You can also:

- visit us at any branch

¹ If you have a TD Wealth, Direct Investing, TD Mutual Funds or TD Investment Services Inc. account with us, you can designate a Trusted Contact Person. Your Trusted Contact Person is someone we notify under certain circumstances, such as when we suspect you may be the target of financial exploitation, notice signs of diminished mental capacity impacting financial decisions, or are missing key contact information for you or your legal representative.

- use EasyWeb® Internet banking
- use automated teller machines (**ATM or ATMs**)

If you don't want to have your image recorded at branches or at automated teller machines, you have other options for most services. You can:

- use EasyWeb Internet banking
- use EasyLine® telephone banking



You can give us your preferred or chosen name to use when we communicate with you. In some cases, we will need to use your legal name. For example, on account statements.



We do not collect information from minors or those we know do not have legal capacity, without their legal guardian's consent, unless required or permitted by law.

Information From Other Sources

We may collect information about you from sources within TD or outside of TD. These sources include:

- government and law enforcement agencies and registries
- public records, such as bankruptcy or criminal records
- credit bureaus, such as Equifax or TransUnion
- other financial or lending institutions. For example, if you have credit accounts with other banks
- fraud prevention agencies and investigators
- background check databases and other registries we use to check the information you give us
- payment card networks
- merchants or dealers involved in the sale of property to you that is being financed by TD, such as a car dealership
- your Trusted Contact Person or any person who has the legal authority to act on your behalf
- companies, organizations, partners and financial institutions you have accounts with, when we buy or sell all or part of a business, or a set of assets. Or who transfer or assign to us any of your loans, leases or other obligations owed to them. Or when we consider those transactions
- your interactions with us, including in-person, over the phone, at the ATM, on your mobile device or through email or the Internet. Including cameras at our property and records of your use of our products and services

Insurance Products & Services

For insurance products and services², we may collect additional information including health-related information from:

- any health care professional, medically-related facility, insurance company, government agency, organizations who manage public information data banks, or insurance information bureaus, including MIB, LLC and the Insurance Bureau of Canada, that have knowledge of your personal information
- a personal investigation report prepared in connection with verifying and/or authenticating the information you provide in your life or health insurance application or as part of the claims process
- external investigators, including through surveillance when investigating claims
- other people or organizations who may have information relevant to a claim we are investigating or confirming such as witnesses of events

i In some cases, information will only be collected from these sources once, such as when you apply for a product or service. In other cases, information will be collected or created on an ongoing basis when necessary to maintain the product or service or confirm your eligibility. For example, information from credit reporting agencies may be required throughout your relationship with TD to confirm that you remain eligible for credit products.

i In many cases, in order to collect information from the sources described above, we will disclose some of your information in order to help ensure we are collecting accurate information about you.

HOW WE USE YOUR PERSONAL INFORMATION

Providing our products and services to you and managing our business

We use your information to help us deliver and manage our products and services, including when we:

- verify your identity
- communicate with you
- comply with regulatory reporting obligations
- assess your eligibility for credit
- prevent and detect fraud

We use your information for the purposes of serving you and to administer our business, and we may use technology to analyze your information, including to:

- verify your identity
- evaluate and process your application, accounts, transactions and reports

² This includes insurance products that we insure, reinsure, administer or sell, including home and auto insurance, life and health insurance, mortgage insurance, and credit cards with insurance benefits.

- provide you with ongoing service and information on the products and services you hold with us
- train staff and confirm our discussions with you
- help inform the advice we may give you for products and services
- develop and improve our products and services or identify new or different products and services that may be of interest and appropriate for you
- understand your needs and give you personalized service
- identify trends in how our products and services are used
- set credit, transaction, overdraft, and hold limits
- help manage and assess our risks, operations and relationship with you
- help us collect a debt or enforce an obligation you owe us



We may pool your information with other peoples' information for research and to create statistical reports. These reports will not identify you.



In some cases, the use and disclosure of your information is a core part of the product or service. In these cases, if you don't agree with this use and disclosure, you may need to choose a different product or service.

Insurance Products & Services

For insurance products and services, we also use your information as follows:

When you apply for, request prescreening for, or renew an insurance product, we will use it to:

- assess your eligibility
- underwrite insurance
- determine the right product, premium or coverage

When you modify or make a claim under an insurance product, we will use it to:

- process, adjudicate and investigate claims
- conduct surveillance
- verify the information you provide in your application
- detect and prevent fraud

Engaging with you

We use your information to communicate with you. We use it to improve and get feedback on our products and services and communications with you. You have choices about which promotional messages you receive.

We use your information to enhance our relationship with you. For example, to:

- **Improve live communications with you** – We may collect and use certain information when you talk to one of our telephone service representatives, Internet live chat agents

or message with us through social media. When you do these things, we may monitor or record our discussions. We may also identify you using your voiceprint, where you have chosen to give it to us. We do all this for our mutual protection, to identify trends, train staff and confirm our discussions with you.

- **Check your eligibility for additional products and services** – We use your information to see if you are eligible for additional TD products or services that may meet your needs and be appropriate for you. We also use it to personalize our offers.
- **Share promotions** – To tell you about, and offer, other products and services that may interest you and be appropriate for you. This includes products and services offered by other businesses within TD. This also includes product and services offered by third parties we select.
- **Contests or surveys** – To see if you are eligible to participate in contests. To administer these contests. To send you surveys or promotions.
- **Contact you** – By telephone, fax, text messaging, automatic dialing-announcing device, or any other method. Or by email, ATM, Internet, mail, and other methods. We will use the numbers and addresses you gave us.



You can opt out of receiving offers. You can also choose how we contact you for marketing campaign purposes. To exercise your choice, please:

- contact us by phone 1-866-222-3456 or visit us at any branch.
- for TDI – the General Insurance Advice Centre at 1-877-777-7136 (University students/Alumni & Professionals) or 1-866-361-2311 (others, general insurance) for TD Insurance for Business at 1-855-724-2883. For life and health insurance, at 1-866-222-3456.
- for TD Wealth – 1-866-567-8888
- for TD Auto Finance – 1-866-694-4392
- to unsubscribe from receiving commercial electronic messages from TD Bank Group, go the following web address: www.td.com/tdoptout

Please note that changing your preferences may not stop you from receiving offers for a marketing campaign that is already underway when you contact us.



TD will **not** send you an unsolicited email to ask you to provide information or login information, such as username, passwords, PINs, IdentificationPlus® security questions and answers or account number.

If you receive an email claiming to be from TD and you think it's fraudulent, don't respond to it. Don't open or click any links. Don't open attachments in the email. Please notify us immediately. Forward a copy of the email to us at phishing@td.com. Then delete the email.



Managing credit products and risk – For credit products³, we use credit reports and other lender information to:

- assess your eligibility and creditworthiness
- establish credit and hold limits
- help us collect a debt or enforce an obligation owed to us by you
- prevent and address fraud
- identify products and services that may be of interest to you
- manage and assess our risks

Insurance products and services – For home and auto insurance products, we use your credit report information (where the law allows), to:

- manage and assess risk
- create models
- assess eligibility for a payment plan
- set premiums
- understand your coverage needs



For insurance products, if you have questions about why we do credit checks, or would like to withdraw your consent, please contact the General Insurance Advice Centre at 1-877-777-7136 (University students/Alumni & Professionals) or 1-866-361-2311 (others, general insurance).

Contractual compliance – We use your information to:

- collect your debts
- enforce legal obligations you owe to us
- investigate your compliance with our agreements

Legal compliance and security

We must use your information to comply with laws, regulations, and industry rules. We must also use it to prevent and investigate crime.



Tax reporting and assessing eligibility for credit – We must use your Social Insurance Number (*SIN*) to report any interest or other investment income you earn under your products or services. The Income Tax Act (Canada) requires us to do this. When you provide us with your SIN, we may use it to help identify you. We may also use it to keep your information separate from other customers with a similar name. This includes through the credit granting process.

³ Credit products include a credit card, line of credit, loan, mortgage or other credit facility, merchant services, auto finance loans, margin loans or a deposit account with overdraft protection, hold and/or withdrawal or transaction limits

You may choose not to have us use your SIN to help identify you with credit bureaus. Just contact us by phone 1-866-222-3456 or visit any branch to select this option. For TD Auto Finance contact us by phone 1-866-694-4392.

Complying with sanctions and financial crime laws – We must use your information to comply with:

- financial crime laws
- anti-money laundering laws
- sanction laws

We must also use your information to check whether you are a politically exposed person (as defined by law). We may also use public information to see if you are a politically exposed person. For example, commercial databases, or credit reports.

Preventing fraud and other crimes – We use your information to prevent, detect or suppress:

- financial abuse
- fraud
- criminal activity
- security risks

We also use your information to:

- assist us with any internal or external investigation into potentially illegal, fraudulent, or suspicious activity
- manage, defend or settle any actual or potential loss
- protect our assets and interests

In order to do these things, we may share your information with any person or organization, including any:

- fraud prevention agency
- regulatory or government body
- the operator of any database or registry used to check information provided against existing information
- any entities engaged in the insurance or financial lending business

When we do share your information for these purposes, we may sometimes pool your information with data belonging to other individuals.

- **Other regulatory compliance** – We will use your information to comply with all laws and regulations. We will also use it to comply with the rules, demands, and guidance from regulators. This includes self-regulatory organizations.

Interacting with TD online

When you interact with TD online, we use your information to:

- deliver our services
- personalize your experience
- prevent fraud
- customize how we advertise on third party websites and apps

Our Use of Web Based Tools:

We use certain technologies and tracking tools on our websites and apps to personalize your experience. As one example, we use cookies. Cookies are snippets of data stored by a web browser. (For example, Chrome, Safari or Firefox web browsers). We also use pixels, beacons, and other technologies. We call these "Web Based Tools".

Essential Web Based Tools – We use Essential Web Based tools to make certain features available to you on our websites. We also use them to help ensure the security of your online browsing experience. They also help us detect, prevent and investigate fraud.

We also use Essential Web Based Tools to collect information on how you use our websites. This includes information about your typing and cursor patterns while you are using our secure sites including EasyWeb and WebBroker. We do this in order to detect and prevent fraud.



You can't opt-out of the use of Essential Web Based Tools. But you can disable the ability for your browser to accept them. If you do disable them, some of our websites might not work properly and your experience may be less than optimal. For example, you will not be able to access any of our secured websites. This is because we use Essential Web Based Tools for security and multi-factor authentication on our secured websites. We also use them for fraud prevention or investigation purposes.

Non-essential Web-Based Tools - We also use Non-essential Web Based Tools so that we can enhance your experience with personalized content, for example remembering your language and similar settings and presenting offers that may be of interest to you. These tools also enable our third-party advertisers to present ads specific to your interests across the Internet and to personalize your online experience.

When you log in to EasyWeb or WebBroker, we may personalize your experience based on your relationship with us. For example, we may display product offers based on which products and services you hold with us. This personalization may occur even after you have logged out. We may also contact you with personalized offers based on the content you browse on TD websites.



Personalization of TD Content – You can make choices about how we use Web Based Tools to personalize content on our websites⁴. Use the Ad Choices & Personalization link. It is available at the bottom of our websites.



If you adjust your browser settings to refuse Web Based Tools, you may still receive generic TD ads. However, they will not be based on your preferences or the products and services that you hold with us.

Online Advertising:

We subscribe to Digital Advertising Alliance of Canada's Self-Regulatory Principles for Online Behavioral Advertising. These principles promote consumer awareness and choice about how organizations use consumer information for Online Behavioral Advertising.

- **Advertising Tracking** – TD and our third-party service providers⁵ may use Web-Based Tools to tailor TD advertising to you on both TD and third-party websites. We use Web

⁴ Our TD websites include:

www.tdcanadatrust.com
apply.td.com or demande.td.com
secure.tdcanadatrust.com
www.tdwealth.ca
www.tddirectinvesting.ca
www.tdassetmanagement.com/
www.tdgis.com/gl/en
www.tdinsurance.com

This also includes your interaction with our advertisements on third-party websites.

⁵ The digital partners we use for interest-based advertising through cookies include:

Google
Facebook
Twitter
LinkedIn
OATH
Exponential
Mediative
RadiumOne
Addictive Mobility
Juice Mobile
Native Touch
Medianet
Atedra
Globe & Mail
Ratehub
Fuel Media
Cluep
Postmedia
Amazon
Bell Media
EQ Works
Rogers
Media IQ

Based Tools to track which of our ads you interact with on TD websites and on the websites of companies who help us advertise. This helps us to provide ads that are more relevant to you.



You can view a list of our third-party service providers, access their privacy policies, and update your choices about our interest-based advertising on TD and the third-party websites through our Ad Choices & Personalization tool.

- **Relationship-based Ads** – We may collect and use information about your relationship with us to help decide which ads or offers to present to you and to identify other people with similar interests on the websites of companies who help us advertise. For example, we may match your masked contact information with social media or other sites and, if you are a member of that site, use it to show you or others with similar interests our ads. Those sites may track how you interact with our ads. We won't do this if you have opted out of receiving marketing from TD or have opted out of relationships based ads with your social media or webmail sites. You can go to those sites to review your settings.



Here's how you can opt-out of receiving relationship-based ads. You can update your settings on your social media or webmail sites. Or, where the websites of companies who advertise for us provide an opt-out, you can use the TRUSTe's online opt-out tool. Opting out will block our ads from other sites you may visit as well.

If you click on one of our ads on a third party website, we may use Web Based Tools. We use Web Based Tools to track how effective our online advertising is. We may also use Web Based Tools to deliver ads that may be relevant to you in the future.



We have enabled these Google Analytics Advertising Features:

- Re-Marketing with Google Analytics, and
- Google Analytics Demographics and Interest Reporting

You may opt out of Google Analytics tracking. To do this, install the Google Analytics Opt-Out Browser Add-On. You may opt out of ad serving on Google's opt-out page.

- **Search engine interest-based tracking** – We advertise on search engine results pages. Search engines may use several factors to decide which ads to place, including your search terms and browsing history.



You can opt-out of interest-based search engine advertising. Just select the notification icon after the URL within the ad text to adjust your settings. You may still see our

generic TD-branded ads after you opt-out. These are not based on your interests or browsing.

- **Responding to surveys online** – We place surveys on third-party websites. When you respond to an online survey, we may use your answers or any opinions or information that you volunteer to improve our products or services or to contact you.

Our Mobile Apps:

If you use a TD mobile app, we use your information to:

- operate the TD mobile app
- help us understand how our users use our apps
- authenticate you
- keep the TD mobile app secure and prevent fraud
- improve our TD apps

We advertise to you on third party apps. To do this, we use your device identifier. For example:

- Apple’s Identifier for Advertiser (IDFA), or
- Google Advertising ID (AAID)

If you click on one of our ads on a third-party app, we may use Web Based tools such as your device identifier. We use them to track how effective our advertising is. We also use them to deliver ads that may be relevant to you in the future.



You can opt-out of our interest-based advertising shown to you on third-party apps. You can use the TRUSTe tool. It is available at: <http://preferences.truste.com/truste/4>. Or you can refer to the advertising settings of your mobile device. If you opt-out, you may still see some of our generic TD-branded ads on third-party apps.

The following chart lists the type of information we collect on our mobile apps and how we use it:

Information we collect	How we use this information
Financial information (including transactional data) and other information you provide through the app or you have allowed the app to obtain.	To give you certain services through our apps.

<p>Geolocation: If enabled, the approximate physical location of your device.</p> <p>Mobile Country Code: A three digit number that indicates the country in which your mobile device is registered. For example, 302 is the mobile country code for Canada.</p>	<p>Depending on the app, for regulatory and security purposes, or to provide you with location-based services (such as to find a TD branch nearby).</p> <p>With your consent, we may also collect and use your location information to generate and notify you of events and offers.</p>
<p>IP Address: A unique numerical label that identifies your device and allows it to communicate over a computer network.</p>	<ul style="list-style-type: none"> • Communicate with your device • Provide you with services • Identify your region for legal and regulatory purposes • Authenticate you and for security purposes (including fraud prevention) • Present offers relevant to your region • Google Maps: to provide location information that you request. To support features such as Severe Weather and Safety Alerts. When using the TD app, you agree to the collection, processing and storing of the data that is automatically gathered by Google LLC., its representatives and/or third parties. For more information, please visit https://cloud.google.com/maps-platform/terms
<p>Contact list</p>	<p>With your consent, to populate contact information for certain transactions (such as a TD Interac® e Transfer). Only the contacts you select will be shared with TD.</p>
<p>Photos and/or camera</p>	<p>With your consent, to populate information for certain transactions (such as remote cheque deposit, or to provision cards for mobile payments®).</p>
<p>Other Device-related information:</p> <ul style="list-style-type: none"> • Mobile device identification number (IMEI); 	<ul style="list-style-type: none"> • Identify and communicate with your device (for example, push notifications)

<ul style="list-style-type: none"> • MAC address; • Device ID: A unique number that identifies your device; • Mobile phone number; • Make and model of your device; • Operating system of your device; • Information about your device's screen size; • Date and time of your use of the mobile app. • Mobile Marketing ID -IDFA, AAID (if enabled) 	<ul style="list-style-type: none"> • Use and provide cards for Mobile Payment (e.g. payment network requirements for <i>Visa*</i>, <i>Mastercard®</i> and <i>Interac®</i> networks) • Authenticate you and your device • Provide you with services and offers compatible with your device • Perform analytics • Prevent fraud • Determine the eligibility of your device • Generate and send TD advertising on third party apps
<p>Device usage information including:</p> <ul style="list-style-type: none"> • Device orientation and movement; • Tapping, typing and swiping patterns. 	<p>To detect and prevent fraud</p>
<p>Wearables/OTHER Bluetooth on the device</p>	<p>Allow your device and your wearable to communicate with any TD app for your smart watch</p>

Android app permissions

When you download the TD app on an Android device, the TD app may ask you to accept some "Android Permissions". Some of these Android Permissions relate to how we are going to use your information.

The TD app may ask you to consent to these Android Permissions the first time you download the app. Or when you access specific features in the TD app. The following chart lists these additional Android permissions requested by the TD app and why.

Android Permission	How we use this information
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Device & app history	When multitasking, the TD app may use device and app history to retrieve the TD app from the background and to keep you logged in for up to 10 minutes.
Phone	To make phone calls when you initiate "one-touch" dialing to TD branches and EasyLine from within the TD app. TD will not access your phone log.
Photos/Media/Files	To read credit card information securely stored on the SIM card and to access the Android Google Maps service for TD location.
Wi-Fi connection information	The TD app checks for and uses an active Internet connection to allow the TD app to function through communication with TD servers.
Device ID, SIM card & call information	<ul style="list-style-type: none"> • Identify and Communicate with your device • Authenticate you and your device • Provide you with services and offers compatible with your device • Perform analytics • Prevent fraud • Determine the eligibility of your device for certain services
Near-field communication (NFC) tag	<ul style="list-style-type: none"> • Facilitate NFC point of sale purchases

SHARING INFORMATION WITHIN TD

We share information within TD

We are committed to legendary customer service. We strive to give you streamlined services, eliminate repetition and annoyances for you. To help us manage your total relationship with us, we share your information within TD (except where the law doesn't allow it). In some cases, this includes sharing your information with our affiliates in other countries.

We may share your information within TD, including sharing with our affiliates, in Canada and outside of Canada, for these purposes to:

- manage your total relationship within TD. Including servicing all your products and services and maintaining consistent information about you. This also includes if you exhibit signs of diminished mental capacity which may affect your ability to make financial decisions
- understand your needs and give you personalized service
- identify trends to improve our products and services
- manage and assess our risks and operations. This includes to collect a debt owed to us by you
- comply with legal and regulatory requirements
- allow other businesses within TD to tell you about their products and services



If you do not want other businesses within TD to contact you about their products and services, please:

- contact us by phone 1-866-222-3456 or visit us at any branch
- for TDI – the General Insurance Advice Centre at 1-877-777-7136 (University students/Alumni & Professionals) or 1-866-361-2311 (others, general insurance) for TD Insurance for Business at 1-855-724-2883. For life and health insurance, at 1-866-222-3456.
- for TD Wealth – 1-866-567-8888
- for TD Auto Finance – 1-866-694-4392
- to unsubscribe from receiving commercial electronic messages from TD Bank Group, please go the following web address: www.td.com/tdoptout



You can also limit access to your TD Canada Trust (TDCT) bank profile so that only certain groups within TD have access to your TDCT account numbers and balances. However, exercising this choice will limit the ways in which we can provide you with service. For more information, please contact us by phone 1-866-222-3456 or visit us at any branch.



If we collect your health-related information we will not share it within TD, except as follows:

- We may share it with a TD affiliate that insures, reinsures, administers or sells insurance. And it may only be shared for the purposes we describe in this Privacy Policy.

TD SERVICE PROVIDERS

We use service providers for many reasons. For example, they help us serve and communicate with you. They support our business operations, help us develop products, and make service enhancements. They help us to market our products and services. They help us to comply with the law.

TD service providers may only access and use your information to provide the services under their agreement with us. In some cases, our agreements allow these service providers to use the data to improve their service. For example, to develop tools that prevent fraud. We carefully assess our service providers' security practices. We also require that they keep your information confidential and destroy it when no longer required.

Our service providers include those who support us with:

Technology, such as:

- website hosting
- data storage and analysis
- security and software
- online advertising
- mobile apps
- our internal systems
- telephone and electronic communications

Customer Service, such as:

- transaction processing
- customer inquiries
- creating account statements and cards
- mailings
- application processes
- insurance products and claims

Legal and Financial Compliance, such as:

- accounting
- tax filings
- debt collection
- legal claims
- auditing
- investigations
- business transactions

Risk Management, such as:

- anti-fraud
- insurance information agencies
- identity authentication services
- credit reporting

DISCLOSING YOUR PERSONAL INFORMATION

Providing our products and services to you

We may disclose your information to third parties, including to credit bureaus, payment networks and others. We disclose to these parties to help us deliver the products and services you request and to manage our business and risks. We don't sell or rent your information.

We may disclose your information:

- To people or organizations with your direction or with your consent. For example, disclosing your account information to a joint account holder, including information about the account prior to it becoming a joint account.
- To payment card networks so that they can:
 - Operate the payment system that supports your product or service with us
 - Develop and make products and services available to you that relate to your product or service with us
 - Support any contests or other promotions they may make available to you
 - Update your card information with merchants who bill you on a recurring basis
 - Use some of your information for their own research and analysis

Please review the privacy policies of the third parties relevant to your products. For example, Visa and/or Mastercard payment networks.



You may opt out of having your pre-authorized payment information automatically updated with merchants. Please contact us at 1-866-222-3456 or visit any branch to make this choice.

- To anyone we make arrangements with to offer you a co-branded service. We call these entities our "brand relationships". We will disclose your information to them only if you apply for or use a co-branded service that we offer. For example, a payment card with loyalty program benefits. We disclose your information to our brand relationships for several reasons, such as to:
 - see if you are eligible for the co-branded product or service
 - set up the co-branded product or service
 - administer, analyze and market the co-branded service, including awarding any points or rewards. This includes analyzing and developing new benefits

The information that we disclose to brand relationships may include transactions on your co-branded product, contact information and date of birth. It may also include any other information that is necessary or relevant to support the co-branded program.

Our brand relationships will collect and use your information as set out in the terms and policies of their programs.

- To merchants, dealers, appraisers, insurers, tax authorities, lenders and others involved in the sale or leasing of property to you that is being financed by TD.
- For insurance products, to health-care professionals, medically-related facilities, insurance companies (including prospective insurers and reinsurers) and their administrators and service providers, organizations who manage public information data banks, or insurance information bureaus, including the MIB, LLC and the Insurance Bureau of Canada, to allow them to properly answer questions when providing us with information about you.
- To mortgage default insurers. We will disclose to them when you apply for or obtain products that have mortgage default insurance. For example, mortgages and home equity lines of credit. These insurers may also obtain your information from other sources, including credit bureaus. These insurers may use your information for any purpose related to the credit product and insurance.
- We may assign (sell) or securitize part or all of your mortgage loan or credit card and the collateral charge to someone else. If we do, we can disclose your information to the participating organizations and those listed below. We will only disclose for the purposes related to the assignment or securitization. The persons we may disclose to includes:
 - auditors
 - credit bureaus
 - creditors
 - financial institutions
 - issuers
 - underwriters
 - insurers
 - proposed purchasers
 - advisers
 - governmental authorities
 - your past and present employers or any other reference you have given us
- In connection with credit products, to credit bureaus and other lenders. We may disclose your information at the time of and during the application process, and on an ongoing basis. We do this to:
 - assess your eligibility and creditworthiness
 - establish credit and hold limits
 - help us collect a debt or enforce an obligation you owe us
 - manage and assess our risks



Once you have a credit product with us, we may continue to disclose your information to other lenders and credit bureaus. We may keep doing this for a certain period of time after your credit facility ends. This helps establish your credit history. It also supports the credit granting process in general.



Once you have applied for any credit product with us, you may not withdraw your consent to this exchange of your information with the credit bureaus. You can see or correct your information contained in your credit bureau file. To do so, contact the reporting agencies directly. Here are the links to their websites www.consumer.equifax.ca and www.transunion.ca.

Managing our business, risks and legal compliance

We will disclose your information to third parties to manage our business and legal obligations. For example, when we sell all or a part of a business or assets. Or when we engage with others to:

- deliver a product or service
- cooperate with estate and bankruptcy trustees
- collect debts
- prevent fraud or investigate misconduct

Business transactions – We may disclose your information when we enter into a business transaction. Examples include when we:

- buy or sell all or part of our business or assets
- securitize assets
- assign or grant a participation in all or part of a credit facility, lease, or other asset
- consider any of those transactions

If we sell assets involving your information, the purchaser may be permitted or required by law to retain your information. We require parties entering into a business transaction with us to keep your information confidential.

Debt collection – We may sell your debt to a third party. If we do, we may disclose your information needed to allow that third party to securitize and/or collect the debt.

Estates and bankruptcy matters – We may release any information regarding a joint account that has a right of survivorship, when a joint account holder dies. We may disclose to the estate representative all account information up to the date of death. However, if the account is in Quebec, we may disclose to the liquidator all account information up to and after the date of death. We may provide any of your information to your estate or bankruptcy trustee as required by law.

Preventing fraud and protecting our interests – We may disclose your information in order to:

- prevent, detect or suppress financial abuse, fraud, and criminal activity
- protect our assets and interests
- investigate potentially illegal or suspicious activity

- manage, defend or settle any actual or potential loss

To do any of the above, we may disclose your information, individually or pooled with other people's information, to any:

- person or organization
- investigative body
- fraud prevention agency
- regulatory or government body
- person who operates a database or registry used to check or verify your information
- insurance companies or financial or lending institutions

Emergencies – We may disclose your information to law enforcement, government authorities or their agents in emergencies. This would arise if we think there is imminent danger to the life, health or security of an individual.

Financial abuse and protection – We may disclose your information if we think you might be a victim of fraud, financial abuse or other illegal activity. We may disclose it to:

- law enforcement, government authorities or their agents
- other financial institutions or organizations
- a family member
- Trusted Contact Person
- your legal representative

We may also disclose your information, including your health information, to your Trusted Contact Person. We may do this where we believe you exhibit signs of diminished mental capacity that may affect your ability to make financial decisions. We may also do this if we are unable to contact you or your legal representative.

Court orders, regulatory demands and other legal compliance – We will disclose your information to third parties where the law requires us to do so. For example, to comply with court orders or legal and regulatory obligations. We may also disclose your information to third parties where the law permits us to do so.

 For example, we disclose your information to:

- Canadian and international tax authorities to report revenue
- Regulators, courts, law enforcement and other organizations to respond to requests that we believe to be valid. For example, a court order, search warrant or other demand or request
- Regulators and self-regulatory organizations to comply with legal and regulatory requirements that apply to us



We may disclose your medical information to public health authorities. For example, we may disclose your lab results if they show infectious diseases. We may learn this information in connection with our insurance products.

Sometimes we need to comply with legal obligations that apply to you or us outside Canada. For example, you may hold securities issued by an issuer in the European Union. If you do, regulations in the European Union may require us to disclose your contact and holdings information to the issuer.

PROTECTING YOUR PERSONAL INFORMATION

Security Measures

We have internal policies and security standards to help protect our systems and your information against unauthorized access and use. We retain your information only for the time we need it. And we only use it for the purposes that we explain to you.



For example, we have designed our systems so that your Personal Identification Number (PIN), password and other access codes are always private and confidential.

Our agents and service providers are bound by contracts to keep your information confidential and must not use it for any unauthorized purpose. We train our employees on the procedures they must take to keep your information safe.

We have policies and procedures to:

- prevent unauthorized access to your information
- respond to privacy questions, complaints, or breaches
- limit the use of your information to the purposes communicated to you
- honour the choices you made about your information
- retain your information for the period we need it to serve you and manage our business and legal obligations
- securely destroy your information or convert it to an anonymous form after the time we don't need it
- help make sure that any service providers or agents who handle your information on our behalf, in Canada or elsewhere, protect that information

We review our procedures and security measures on a regular basis. We do this to help make sure that they remain effective and appropriate.

We may modify information to help protect your identity, such as by removing direct identifiers, aggregating or anonymizing it, before using or disclosing it for certain purposes.

Some of the ways we use your information are to support our efforts to protect your security. For example, we may ask you to provide certain information to authenticate you. This helps to

prevent unauthorized access to your accounts. And it helps to support our efforts that we are collecting the correct information from third parties.

You can obtain more information about our policies, procedures and security standards. Please contact us using the information under the heading "Questions" below.

Transfers of Your Information to Other Regions

TD is a global organization. TD has affiliates and service providers across Canada and in other countries. We and they may use, store or access your information in any region in Canada and other countries. These countries may include the USA, UK, European states, India, and others where TD has a business presence. We take steps to protect your information wherever it is handled, subject to requirements to disclose it in response to legal demands or requests from governments, regulators, courts and law enforcement authorities in other jurisdictions that we deem to be valid.

Retaining and Destroying your Personal Information

We retain your information only as long as we need it for the purposes we collected it. We have procedures to help us determine the length of time we will retain your information. The length of time varies. It depends on the product or service, the sensitivity of the information, and the purposes for which we use it. We may retain your information after the end of your relationship with us. For example, when we need your information:

- for legal or regulatory purposes
- to respond to issues that may arise at a later date
- to support the credit reporting system
- to support fraud prevention organizations and other risk assessments
- for security purposes

We have procedures to guide what we do when we no longer need your information for these purposes. We may securely destroy, delete, or erase it. Or we may convert your information to an anonymous form.

You can contact us if you have questions about how long we retain your information. Contact us using the information under the heading "Questions" below.

YOUR RIGHTS TO ACCESS AND CORRECT INFORMATION

Accessing your personal information

Upon request, we will give you access to the information we retain about you. If you ask us, we will help you make your request.

Most of your information is in the form of your transaction records, such as account statements. Here's how you can obtain your transaction records:

- visit the branch or office where your account is held
- log in to our EasyWeb or WebBroker online platforms
- call us on EasyLine
- visit Green Machine® ATMs
- for TDI – the General Insurance Advice Centre at 1-877-777-7136 (University students/Alumni & Professionals) or 1-866-361-2311 (others, general insurance) or TD Insurance for Business at 1-855-724-2883. For life and health insurance, at 1-866-222-3456.
- for TD Auto Finance – 1-866-694-4392 for TD Asset Management – Client Support 416-983-0055 / 1-888-834-6339 or inst.info@tdam.com
- for TD Wealth – Direct Investing Contact Centre 1-800-465-5463

If you need information not found in your transaction records, contact us or send a written request to the branch or office that holds your account. We will ask you for your information to confirm your identity. We may also ask for specific details such as your branch and account number.

We will let you know in advance if a minimal charge will be required for conducting the search and we will respond to your request within 30 days.

If the information you want concerns any decisions we made about your product or service applications, we will tell you the reasons for those decisions unless otherwise prohibited by law. If we relied on information from a third party, such as a credit bureau, to make the decision, we will, where the law allows, provide you with the name and address of that third party.

Please note that we will not be able to provide information about you from our records that contain references to other persons, is subject to legal privilege, contains confidential information proprietary to TD, relates to an internal investigation, risk assessment or violation of law, or that cannot be disclosed for other legal reasons.

Correcting your personal information

We make reasonable efforts to keep your information accurate and up to date.

This helps us give you better service. It also reduces the chance that we may use wrong information to make a decision which could impact you. We have procedures and practices to help us maintain the accuracy of your information.

You can help by keeping us informed of any changes. For example, tell us if you move or change telephone numbers. If you find any errors in our information about you, let us know right away. We will make the corrections. We will also give the corrections to anyone we

gave your information to and who relies on it. If we don't agree with your requested change, we will note your request in your file.

Automated decision making

We use various technology tools to help us serve and communicate with you. We also use them to anticipate your needs. In most cases, these tools help, but don't replace, our TD employees in meeting your needs. In some cases, the tools allow us to make decisions about you in real time because the process is fully automated. When this occurs, we may notify you in advance of the decision, for example, in the application process. We will also tell you how you can contact us to learn more about the automated decision process.

Questions?

If you have any questions on this Privacy Policy, you may call us at 1-866-222-3456.

If this does not answer your question, you may contact the TD's Chief Privacy Officer at:

Email: TD.Privacy@td.com

Mail: Toronto-Dominion Centre, P.O. Box 193, Toronto, ON M5K 1H6
Attn: TD's Chief Privacy Officer

RESOLVING A COMPLAINT

Do you have a complaint?

We take your concerns seriously. We work hard to help resolve any privacy complaint.

If you have a privacy complaint, please follow our complaint resolution process. This is set out in this link.

<https://www.td.com/to-our-customers/resolving-your-problems/comments.jsp>

If your complaint is not resolved by us, and it relates to a potential violation of privacy law, you may contact:

- **The Office of the Privacy Commissioner of Canada.**
Website: www.priv.gc.ca
Phone: 1-800-282-1376 Fax: 1-819-994-5424
Mail: 30 Victoria Street, Gatineau, QC K1A 1H3,

or

- **A provincial privacy regulator** for some products and services

Please contact us if you need help to identify the right regulator.

MORE INFORMATION

Privacy Policy Updates

We may change this Privacy Policy from time to time. The current Policy will be available on our website td.com/privacy.

If you have any questions on this Policy, please contact us at 1-866-222-3456.

If this does not resolve your question or request, you may contact TD's Chief Privacy Officer at:

Email: TD.Privacy@td.com

Mail: Toronto-Dominion Centre, P.O. Box 193, Toronto, ON M5K 1H6

Attn: TD's Chief Privacy Officer

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