**MEGA INTERNATIONAL COMMERCIAL BANK (CANADA)**
**PRIVACY POLICY FOR CUSTOMER INFORMATION**

Established on March 14, 2002

1st Revised on Sep.21, 2006

**2nd Revised on June 12, 2014**

## Purpose:

In order to comply with the "Personal Information Protection and Electronic Documents Act (PIPEDA)", the Bank has set up privacy policy and procedures to ensure the security and confidentiality of **its** customer information. The privacy policy, described below, will explain how the Bank plans to protect **its** customers' personal information from any unauthorized access or use.

## The Scope of This Policy:

This privacy policy for customer information outlines the principles that the Bank will use to protect the privacy of individual customers' personal information. This policy does not apply to the information about business customers who carry on business as corporations, partnerships, or in other forms of associations. The Bank does, however, protect the confidentiality of such information in accordance with the **laws, regulations,** and the Bank's own policies.

## Policy:

1. The Bank is responsible for all customer information under its control. The Bank will designate responsible officers who are accountable for compliance.

2. The purpose for which customer information is collected shall be identified by the Bank at or before the time the information is collected.

3. The knowledge and consent of the customers are required for the collection, use and disclosure of customer information except otherwise required or permitted by law. **The Bank shall communicate clearly with its customer when obtaining consent and to consider whether its customer can understand the consequences of sharing their personal information.**

4. The collection of customer information shall be limited to that which is necessary for the purposes identified by the Bank. **Customer** information should be collected by fair and lawful means.

5. Customer information shall not be used or disclosed for purpose other than those for which it was collected, except with the customer's consent or as required by **law.** Customer information shall be kept only as long as necessary for fulfillment of those purposes except as otherwise required by law.

6. The Bank will, by reasonable efforts, keep customer information as accurate, complete and current as necessary for its purpose.

7. The Bank will protect customer information with security safeguards appropriate to the sensitivity of the information.

8. The Bank is open about its policies and procedure relating to the management of customer information.

9. Upon request **by customers** in writing, the Bank will within a reasonable time inform the customers of the existence, use and disclosure of their information and give them access to that information. The customers may challenge the accuracy and completeness of the information collected, used or disclosed by the Bank. Should the customers successfully demonstrate the inaccuracy, incompleteness or not current of customer information, the Bank will amend the information as required.

10. Customers may direct their concerns, questions, or complaints regarding the privacy issues by contacting the designated officer(s) accountable for privacy in the Bank.

## Procedures:

1. **Designation of Privacy Officer**
   **The Chief Compliance Officer shall be designated as Privacy Officer of the Bank. The Privacy Officer oversees all ongoing activities related to the development, implementing, maintenance of the Bank's policies and procedures covering the protecting of customer information in accordance with PIPEDA.**

2. **Compliance**

   (1) Senior management of the Bank will have ultimate accountability for

protecting its clients' personal information.

(2) The Bank's Compliance Officer is responsible for overall privacy protection and compliance. The Compliance Officer is entitled to delegate day- to-day responsibility for administration of this policy to the managers of each Branch/Department. Designated officers should report to the Compliance Officer on compliance issues.

(3) The Compliance Officer has to report to Conduct Review and Corporate Governance Committee of the Board of Directors annually regarding compliance with its Privacy Policy.

**(4)** The Bank will not condone any violation of this Privacy Policy. If a contravention is occurred, **disciplinary actions must be launched and the following procedures shall be adopted:**

**a. Inform customers if their personal information has been lost or stolen, and what risks that they could be harmed as a result;**

**b. Tell customers what steps they can take to protect themselves;**

**c. Report the breaches to the Privacy Commissioner of Canada;**

**d. Keep records of all data breaches and provide it to the Privacy Commissioner upon request;**

## 3. Obtaining the customers' consent

(1) The Bank will obtain consent from the customers before or when information is collected, used or disclosed where required or permitted by law.

(2) Customers can express consent orally, such as when information is collected over the telephone, or in writing.

(3) Customers can also express consent through an authorized representative such as a legal guardian or a person with a power of attorney.

**(4)** The Bank can collect, use, or disclose personal information without the knowledge and consent of the customer for the purposes of:

- **Identifying an injured, ill or deceased individual and communicating with their next of kin or an authorized representative;**
- **Performing police services;**
- **Preventing, detecting or suppressing fraud, or**
- **Protecting vulnerable victims, such as children and senior, from financial abuse;**

(5) The Bank will not ask for consent when personal information is given to agents of the Bank who need it to carry out banking functions, such as data processing on the printing of cheques and credit cards.

(6) The Bank may **only** disclose personal information without consent when required by law.

For example:

- subpoenas
- search warrants
- other court and government orders
- demands from other parties who have a legal right to personal information.

In these circumstances, the Bank will protect the interests of its customers by making reasonable efforts to ensure that:

- orders or demands appear to comply with the laws under which they were issued;
- it discloses only the personal information that is legally required, and nothing more;
- it does not comply with casual requests for personal information from government or law enforcement authorities.

**The Bank may notify customers by telephone, or by letter to the customer's usual address that an order has been received, if the law allows it.**

(7) Subject to legal and contractual restrictions, customers can refuse or withdrawal consents at any time as long as:

- the Bank is given reasonable notice of the withdrawal.
- consent does not relate to a credit product where the Bank must collect and report information after credit has been granted. This is to maintain the integrity of the credit system.

(8) The Bank will let the customer know the consequences of refusing or withdrawing consent when customers seek to do so. Refusing or withdrawing consent for the Bank to collect, use or disclose personal information could mean that the Bank cannot provide the customer with some product, service or information of value to the customer.

## 4. Security Procedures

The Bank established the following procedures to safeguard the privacy of personal information:

(1) All employees will be trained relating to administration and safeguarding data.

(2) Based on “need-to-know” basis, all customer information can only be accessed by employees who have a business reason and need access to do their work.

(3) Some personal information may be edited, altered, modified, or destroyed by specific authorization, such as password, in order to prevent unauthorized access or disclose the information.

(4) All files that contain customer information will be kept in a locked file-room or in a locked cabinet.

(5) Customer inquiry on individual access of his or her personal information will be subject to verification of authorization.

## 5. Outsourcing

(1) In order to reduce or to control operation cost, the Bank may contract out a business function to an outside service provider instead of performing function itself. The Bank will request the outside provider to demonstrate how they safeguard the information provided by the Bank and how they meet the compliance with the PIPEDA.

**(2)** Confidentiality and security clauses should be properly incorporated in the Outsourcing Agreements **signed with outsourcing service providers.**

## 6. Customer’s Complaints and Questions

(1) Customers may challenge Bank’s compliance with the Privacy Policy and other relative issues. **Contact information of each officer designated to be responsible for customer complaints should be available to the public on the Bank’s website at: https://www.megabank.com.tw/abroad/canada/canada01.asp.** The Bank will receive, investigate and respond to customers’ complaints and questions relating to the handling of personal information properly.

(2) If it finds a complaint justified, the Bank will try to resolve it. If necessary, the Bank will change policies and procedures to ensure that other customers will not experience the same problem.

**(3)** If customers are not satisfied with the way the Bank has responded to their complaint, they may write to **the Bank's external complaint body (ECB)**: **The Ombudsman for Banking services and Investments (OBSI)** at **401 Bay Street, Suite 1505, P.O. Box 5, Toronto, Ontario M5H 4Y2 or Toll-free Tel:1-888-451-4519 or 416-287-2877.**

**(4) Or they can contact the Financial Consumer Agency of Canada at 427 Laurier Avenue West, 6th Floor Ottawa ON K1R 1B9**

## Training

1. **Employees of the Bank are required to familiarize with this policy and procedures, as well as contents of PIPEDA which can be obtained from the following website:**
   **http://laws-lois.justice.gc.ca/eng/acts/P-8.6/page-1.html**
2. All the employees of this Bank are required to familiarize this policy and procedures required in it as well as PIPEDA, which is a vital appendix of policy.
3. New employees should receive appropriate guidance in this respect during the probation period.
4. **The name of the Privacy Officer shall be publicized within the Bank, and employees are encouraged to discuss privacy issues with the Privacy Officer.**

## Audit Program

The Internal Auditor **shall** conduct compliance audit **at least** annually.