

Website Privacy Policy

Last Updated July 26, 2023.

The Native Commercial Credit Corporation (“**NCCC**”) and the Aboriginal Savings Corporation of Canada (“**ASCC**”), their other affiliated and related companies (collectively with NCCC and ASCC, “**NCCC/ASCC**”) respect your privacy and are committed to protecting your personal information in accordance with applicable laws. This policy (the “**Policy**”) concerns the protection of personal information by NCCC/ASCC and is applicable to all their collection and processing of personal information, including through Websites owned and operated by NCCC/ASCC (the “**Websites**”), whether accessed by a smartphone or a computer, including the following Websites and their sub-domains:

- <https://socca.gc.ca/>;
- <https://www.lasedac.ca/>; and
- <https://habitationpremieresnations.com/>.

The terms “**you**”, “**your**”, and “**yours**” refer to the person whose personal information is collected or processed by NCCC/ASCC. The terms “**we**”, “**us**”, and “**our**” refer to NCCC/ASCC.

The Policy aims to help you understand how NCCC/ASCC collect, use, process, communicate, retain, and protect your personal information. It is important for you to read and understand this Policy as it establishes a contract between you and us. By submitting any personal information to the Websites, you agree to be bound by the terms of this Privacy Policy. This Privacy Policy is divided into the following sections.

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1. What Personal Information Do We Collect About You?

Privacy laws in Canada generally define “**personal information**” as any information about an identifiable individual. This includes information that can be used alone or with other information to identify, contact, or locate a particular person. Information from which all direct and indirect identifiers have been removed (i.e., anonymized personal information) is not considered personal information.

We may collect, use, store and transfer the following categories of personal information:

- **Identity information**, including first name, last name, preferred name, title, date of birth and band number;
- **Contact information**, including email, address, postal code, and telephone numbers;
- **Technical information**, including internet protocol (IP) address and geolocation information, cookies and other technologies on the devices you use to access the Websites;
- **Internet activity information**, including browsing history, search history, and interactions with our Websites and online advertisements;
- **Financial information**, including banking information, tax information, benefits information and the information related to your financing application; and
- **Sensitive personal information**, including social insurance number and a proof that you are a member of a First Nation or of indigenous descent (i.e., copy of the Indian Status card or member of the Native Alliance of Quebec). However, we do not collect any other sensitive personal information about you (this includes details about your ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, and health, genetic or biometric information). Nor do we collect any information about criminal convictions and offences, except for background checks information.

We may also collect, use, store and transfer the following categories of personal information about our employees and candidates who apply for a job with NCCC/ASCC:

- **Background check information**, including criminal record, copies of identification documents, medical reports;
- **Emergency information**, including emergency contact information, medical condition, allergies;
- **Medical information**;
- **Identity information**, including date of birth, education history, residential address, employee ID number and passport information, including passport number, nationality, place of issue of passport, passport issue date and passport expiration date;
- **Security footage**, including videos of you as captured by our CCTV cameras; and

- **Technical information**, including your username(s), credential(s), a log of both successful and failed attempts to connect to NCCC/ASCC systems, your location when using NCCC/ASCC systems, and the information about the device you use to access NCCC/ASCC resources.

If you provide NCCC/ASCC with personal information of another individual (e.g. members of your family), you represent that you have obtained all necessary consents from such person to enable us to collect, use and disclose such personal information for the purposes set forth in this Policy.

By providing us with this personal information, by sending us an email or by visiting a Website, you are communicating with us electronically. You then consent to receive non-commercial electronic communications from us, either via the Internet, emails or notices posted on any Website in accordance with this Policy.

You agree that by transmitting agreements, notices, information and other communications to you electronically, we comply with any legal requirement stipulating that such communications must be in writing.

2. How Do We Collect Your Personal Information?

We use different methods to collect personal information from and about you including through:

- a) **Direct interactions.** You may give us your personal information by corresponding with us. This includes personal information you provide when you:
 - i. submit a financing application;
 - ii. purchase savings products such as ASCC bonds;
 - iii. participate in one of the programs we administer on behalf of third parties;
 - iv. use a form on any Website to subscribe to our newsletter;
 - v. use a form on any Website to contact us;
 - vi. voluntarily provide your personal information during a communication with us by any other means for any other reasons; or
 - vii. submit an application for a job opportunity.

In submitting personal information on our Websites, you are prohibited from impersonating another individual. Any financing application or any other application must be made using real names and other requested information.

- b) **Indirect interactions.** We collect certain personal information about you indirectly from our service providers with whom you also do business. This is the case when we receive your application for a vacant position through a recruitment agency, or when we obtain your contact and identity information for marketing purposes from a third party. Any indirect collection of your information is done in accordance with this Policy, any privacy policy of the service provider in question, and in accordance with applicable laws.

- c) **Automated technologies or interactions.** As you interact with our Websites, we will automatically collect technical information and internet activity information about the computer equipment used to use our Websites and browsing actions and patterns. We collect this information by using cookies, pixels, server logs and other similar technologies. We may also receive technical information about you if you visit other websites employing our cookies.

3. Why Do We Collect and Use Your Personal Information?

We may use your personal information for the purposes for which it was collected, as set out in this Policy, for other purposes permitted by law, or for other purposes with your consent.

We may use the information collected for the following purposes:

Type of Personal Information	Purpose
<ul style="list-style-type: none"> • Technical information • Internet activity information 	a. To provide you with access to our Websites and to enhance your convenient use of our Websites.
<ul style="list-style-type: none"> • Identity information • Contact information 	b. Respond to your messages and requests, including your complaints or comments.
<ul style="list-style-type: none"> • Identity information • Contact information • Financial information • Sensitive personal information 	c. Process your financing applications. d. Provide savings products such as ASCC bonds. e. Administer third-party programs that we manage and in which you participate.
<ul style="list-style-type: none"> • Identity information • Contact information • Background check information • Emergency information • Medical information • Security footage 	f. Provide you with access to our online recruitment service and provide you with employment opportunities.
<ul style="list-style-type: none"> • Identity information • Contact information 	g. Comply with obligations imposed by applicable law.

As indicated below in section 8(g), you can always choose not to receive promotional material or commercial information from NCCC/ASCC. For greater certainty, we will not send commercial electronic messages without your express consent.

4. To Whom Do We Disclose Your Personal Information?

Other than as provided below, NCCC/ASCC do not disclose or communicate your personal information to outside organizations or third parties without your consent unless required or permitted by law. Moreover, NCCC/ASCC do not sell your personal information to anyone under any circumstances.

NCCC/ASCC communicate your personal information to third parties in the following circumstances:

- with our service providers who help us fulfil the purpose for which your personal information was collected, including server hosting providers who help us store your personal information;
- with service providers who help us conduct demographic studies of our Websites visitors and job applicants;
- with an organization tasked with improving access to quality services and programs for First Nations, Inuit and Métis, such as Indigenous Services Canada, the Secrétariat aux relations avec les Premières Nations et les Inuit, the National Aboriginal Capital Corporations Association and the SAA or to an organization working to make housing affordable, such as the Canada Mortgage and Housing Corporation, in the context of managing our various programs;
- to comply with our obligations under any law or regulation, an investigation conducted by a governmental authority, a subpoena or order of a court, tribunal or other administrative or governmental authority;
- with law enforcement or a government institution in order to investigate fraud or potential fraud, as well as any other violation of a law, regulation, or the terms and conditions of use of the Websites, or in order to protect the rights, property, or safety of NCCC/ASCC, our customers/users, or our partners; and
- with an acquiring organization in the event of a proposed or actual commercial transaction (including liquidation, realization, seizure, or repossession), concession, merger, business combination, or any other type of acquisition, liquidation, transfer, translational contract, or financing of NCCC/ASCC in whole or in part or of any property, share, assets, stock, or business of NCCC/ASCC.

We require all third parties to respect the security of your personal information and to treat it in accordance with the law.

By providing us with personal information, you acknowledge and agree that your personal information may be transferred to other jurisdictions for processing and storage, including in servers located across Canada and in the United States, where laws regarding the protection of personal information may be less stringent than the laws in your jurisdiction. Further, your personal information may be accessible to law enforcement, national security authorities, and the courts of such jurisdictions. Where necessary to make such transfers, we will comply with our legal and regulatory obligations in relation to the personal information. For example, when required by applicable law, we conduct privacy impact assessments to assess the risk associated with transferring personal information outside your province of residence.

5. How Do We Protect Your Personal Information?

NCCC/ASCC have implemented reasonable physical, electronic, and administrative measures to protect your personal information from accidental loss and unauthorized access, use, alteration, and disclosure.

To prevent any unauthorized access to your user profile on a Website, please maintain the accuracy and integrity of the personal information associated with your user profile and ensure that this information is used appropriately.

While efforts are made by NCCC/ASCC to ensure that no third party will view or obtain personal information about you through the Websites, complete confidentiality and security are not yet guaranteed on the Internet. Internet communications can be intercepted, lost, or altered. You acknowledge and consent to NCCC/ASCC not being held liable for damages resulting from the transmission of confidential information or personal information over the Internet and that such communications are made at your own risk.

6. How Long Will We Retain Your Personal Information?

Your personal information is stored at our offices and on the secure servers of our service providers, including servers located outside of Quebec.

In accordance with applicable law and regulations, we will retain your personal information only for as long as necessary to achieve the purposes for which we collected it, including to comply with any legal, accounting, or reporting requirements.

When the personal information collected is no longer required by NCCC/ASCC, the necessary procedures for destroying, deleting, erasing, or converting it into an anonymous form are applied.

7. Children under the Age of 14

The protection of children's personal information is extremely important. NCCC/ASCC understand that they have a responsibility to protect the privacy of children and have no intention of collecting the personal information of children under the age of 14.

The Websites are not intended for children under the age of 14. No one under age 14 may provide any personal information on the Websites. We do not knowingly collect personal information from children under the age of 14. If you are under the age of 14, do not use or provide any information on a Website or through any of their features and do not provide us with any information about yourself, including your name, address, telephone number or email address. If we become aware that we have collected any personal information from a child under the age of 14, we will delete that information.

8. Your Rights in Relation to Your Personal Information

Subject to certain exemptions, as permitted by law, you have the following rights in relation to the personal information we hold about you:

a) Your right of access

You have the right to access the personal information we hold about you and to receive a general account of our uses of that personal information. Upon receipt of a written request from you, we will confirm whether we are processing your personal information and, subject to applicable exemptions, we will provide you with a copy of your personal information. In certain limited circumstances, we may not be able to make all relevant personal information available to you, for example, where that personal information also relates to another individual. In such circumstances, we will, upon request, provide you with the reasons for such refusal. We will endeavour to respond to all legitimate requests within one month. It could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated. If you require additional copies, we may need to charge a reasonable fee.

b) Your right to rectification

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If you are entitled to rectification and if we have shared your personal information with others, we will let them know about the rectification where possible and where this would not involve disproportionate effort. If you ask us, where possible and lawful to do so, we will also tell you whom we have shared your personal information with so that you can contact them directly. We will endeavour to deal with all requests for rectification of personal information in a timely manner.

c) Your right to be forgotten

You have the right to control the dissemination of your personal information. As such, you may request that we de-index (i.e. delist from search results) any hyperlinks associated with your name and that provide access to your personal information if the underlying dissemination of your personal information contravenes the law or a court order, or if it otherwise causes serious injury to your reputation or privacy. This also includes your right to re-index (i.e. list in search results) any hyperlinks associated with your name where doing so can prevent the perpetuation of a serious injury to your reputation or privacy.

You can contact us for assistance in changing, updating or deleting personal information previously provided to NCCC/ASCC. Please note that we will take a reasonable amount of time to process your request.

d) Your right to erasure

You can ask us to delete or remove your personal information in some circumstances such as where we no longer need your information to fulfill the purposes for which it was collected, or if you withdraw your consent (where applicable because your consent was the legal basis on which we were processing your personal information). If you are entitled to erasure and if we have shared your personal information with others, we will take reasonable steps to inform those others where possible and where this would not involve disproportionate effort. If you ask us, where it is possible and lawful for us to do so, we will also inform you about whom we have shared your personal information with so that you may contact them directly.

e) Your right to personal information portability

You may have the right, in certain circumstances, to obtain personal information you have provided us with (in a structured, commonly used, and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

f) Your rights in relation to automated decision-making and profiling

You have the right to know if we use your personal information to render a decision based exclusively on automated processing of such information. Upon request, you also have the right to know the categories of personal information used to render the decision, the reasons, and the principal factors that led to that decision. If you notice any inaccuracy, you have the right to correct the information used to render the decision. Lastly, you can submit observations in support to a request to review any automated decision reached using your personal information.

g) Your right to withdraw consent

If we rely on your implicit or explicit consent as our legal basis for processing your personal information, you have the right to withdraw that consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdrew your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish, you can unsubscribe from our newsletter by sending a written request to our General Manager who acts as the person responsible for the protection of personal information using the contact details provided in section 12 (below) or by choosing not to receive further communications by clicking on the link at the bottom of each email communication.

9. Use of Cookies

We may use cookies to track your preferences and activities on the Websites. By using and visiting any Website, you consent to us using cookies on and off this Website.

Cookies are small data files that are transmitted to your computer's hard drive by a Website. They record your preferences so that your subsequent visits to this Website are more efficient. Cookies can record various information, including the number of times you visit a Website, your registration information, and the number of times you visit a page or another element of the Website. We use cookies on the Websites to:

- (i) improve online customer service and the functionality of the Websites;
- (ii) personalize the content of the Websites; and
- (iii) provide a more secure experience.

Most browsers are designed to accept cookies, but they can easily be modified to block them. Your browser's help files contain information about how to block cookies, detect cookies that are sent to you, and disable them.

However, it is important to know that without cookies, you may not be able to access some of the features of a Website and therefore may not be able to fully enjoy it.

10. Links to Other Websites

The Websites may contain links allowing users to visit other websites operated by other entities. NCCC/ASCC have no control over the sites operated by other entities and in no way assume responsibility for listing them on the Websites. Any information you transmit to websites operated by other entities will be subject to the privacy policies applicable to these websites.

Icons leading directly to social media accounts (collectively "**Social Media**") (such as Facebook) will be accessible on the homepage of the Websites. Social Media accounts are managed by an external advisory services firm. In collaboration with this advisory services firm, NCCC/ASCC will make all reasonable efforts to respond to any comments or questions on Social Media within a reasonable time.

11. Changes to this Policy

NCCC/ASCC reserve the right to modify this Policy at any time without notice. You can consult it at any time on the Websites.

We will notify you of any significant changes to this Policy by posting an update notice on the Websites. Your continued use of our Websites following any such changes constitutes your acceptance of and agreement to be bound by such changes. It is your responsibility to regularly review this Policy and any changes that may eventually be made to it.

12. Questions

If you have any questions about this Policy or our personal information protection practises, including any requests to exercise your legal rights, please contact our General Manager using the contact details set out below:

2936, de la Faune Street, Suite 200
Wendake, Quebec, Canada
G0A 4V0
Telephone (NCCC): +1 418-842-0972
Telephone (ASCC): +1 418-842-8851
Fax: +1 418-842-8925a
Email: administration@socca.qc.ca

13. Language

This Policy is also available in French.