



## Canadian privacy policy

Revised Oct 2020

### Your privacy is protected

**Your privacy is important to us:** You have chosen CIBC to provide your financial services. We value the trust and confidence you place in us. At CIBC, protecting the privacy and confidentiality of your personal information is very important to us and an integral part of our commitment to service excellence. To help us meet this commitment to you, CIBC has appointed a Chief Privacy Officer to oversee CIBC's privacy practices and this policy.

**Your privacy is important to you:** We encourage you to read this privacy policy so that you can understand how we collect, use, share and protect your personal information and how you can manage your information in a way that best suits you. To help you understand our privacy policy, here are some important terms you should know.

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### Important terms

- **“Personal information” or “information”** means information about an identifiable individual such as contact information, account numbers or details, such as age, marital status and financial information. This information can be in any form including paper, electronic, audio, video or biometric, such as voiceprints, photographs and signatures. This information can also include information collected through digital activities, such as device model, browser type and IP address.
- **“CIBC,” “we,” “our” or “us”** means collectively Canadian Imperial Bank of Commerce and its Canadian affiliates that offer deposits, loans, mutual funds, securities trading, portfolio management, investment counseling, mortgages, credit cards, trust services, insurance and other products or financial products and services, including Simplii Financial.
- **“CIBC Foreign Affiliates”** means CIBC's businesses, affiliates, subsidiaries and branches of CIBC located outside of Canada, such as CIBC Bank USA.
- **“Program partners”** means companies we have carefully selected to provide benefits, products or services under, or to participate in, a CIBC partner program.
- **“CIBC partner program”** means a program under which CIBC clients are entitled to receive specified benefits, products or services that are provided by, or in participation with, our program partners. For example, affinity reward or loyalty programs, travel or credit insurance, purchase or credit protection programs and retailer offers or coupons.
- **“Permitted or required by law”** or “legal and regulatory obligations” means actions that we are permitted or required to do under applicable laws or regulations, or applicable rules, codes, guidelines, expectations or requests of any applicable regulator or self-regulatory organization, or under any codes, programs or principles publicly adopted by CIBC.

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### About this privacy policy

This policy works together with our [CIBC Privacy Principles](#), our [Digital Privacy Statement](#) and the privacy provisions in the terms of your agreements with us to form CIBC's privacy policy. This policy applies to

the collection, use or sharing of any personal information collected by CIBC in the course of conducting our business in Canada. It will continue to apply for as long as CIBC holds your information, including after the termination of any of your product or service agreements with us. By providing us with information, you are consenting to the collection, use or sharing of your information as set out in this privacy policy.

For more information about our privacy practices, review the [CIBC Privacy Principles](#), [Digital Privacy Statement](#) or our [Privacy Frequently Asked Questions \(FAQ\)](#).

This privacy policy and our other privacy-related documents will be updated from time to time.

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## What information do we collect?

The type of personal information we collect depends on various factors, such as the type of products or services you request or use, and any applicable legal and regulatory obligations. This information includes:

- **Contact information** that allows us to communicate with you, such as name, address, telephone number, email or other electronic address, social media account name and fax number).
- **Identity information** that allows us to establish your identity, including government-issued identification and utility bills; authenticate your identity through biometric technologies such as voice recognition, identity verification or analysis of interactions with our online services; or to meet tax, anti-money laundering and other “know your client” legal and regulatory obligations, such as date of birth, occupation and government-issued identification.
- **Social Insurance Number (SIN)** to comply with legal or regulatory requirements, such as the *Income Tax Act* of Canada requires us to ask for your SIN when opening a product that earns income. We may also ask for your SIN as an aid to verify your identity and ensure we obtain accurate information from credit bureaus. However, providing your SIN for this purpose is optional (refer to “Your privacy choices” below).
- **Financial information** that allows us to determine creditworthiness or eligibility for or appropriateness of products or services offered to you, such as employment and financial history with others, income, net worth, credit reports, investment knowledge and objectives and details of security provided for loans.
- **Transactional information** about how you use different products or services or otherwise do business with us, such as, purchase and payment history.
- **Health and lifestyle information** about your health, family health history, activities, behaviour and choices that helps us assess your eligibility for life and health insurance products, calculate appropriate premium rates, administer the insurance and adjudicate claims. Health and lifestyle information may include travel plans, hazardous sports and leisure activities. Due to the sensitive nature of this type of information, health and lifestyle information collected for this purpose will not be shared for marketing or loan assessment purposes.
- **Another individual’s information** we request, or that you provide, about an individual other than yourself. For example, this could be information about beneficiaries or insured spouses, common-law partners or dependents under an insurance product or a registered plan; an authorized user of your account; and contact information of someone you believe may be interested in a CIBC product or service). If you provide us with information about another individual, we will assume you have the authority to provide this information and have obtained their consent to its collection, use or sharing for the purposes set out in this privacy policy.
- **Other information** we collect that helps us to understand our relationship with you by learning more about you, including how you like to do business with us and what types of

products, services or offers you may like. This can include language and communication preferences, location, demographics and interests.

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## **How do we collect information?**

We may collect information from you directly, indirectly or from other sources, such as:

- product or service applications and use
- communications with us
- credit bureaus (refer to “Credit bureaus” below for further detail)
- insurance information bureaus
- references you have provided
- program partners
- other financial institutions
- government institutions or regulatory authorities
- user-generated content on our social media websites such as photographs or comments you post
- public sources such as telephone directories, newspapers, Internet sites, commercially available marketing lists, or government agencies and registries like land or property registries or driver licensing offices, or public records

We may also collect information by monitoring or recording your interactions with CIBC through telephone calls, video conferencing, online chats or other interactions with CIBC’s websites and mobile sites in order to:

- enhance and maintain client service quality, including to determine your eligibility for offers and promotions
- protect you and CIBC
- confirm our discussions with you
- conduct quality assurance and coaching. For example, a manager and agent may listen to a call together to identify improvement opportunities
- prevent or detect fraud by analyzing interactions with our online services to help authenticate you

We use surveillance, including video recording, in and around our CIBC Banking Centres, bank machines and other locations to:

- maintain the safety of our clients, employees and others;
  - protect against illegal activity, such as theft, vandalism and fraud; and
  - enhance and maintain client service quality.
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## **How do we use and share information?**

When we make reference to sharing information within CIBC, we mean sharing among CIBC, including its Canadian affiliates and CIBC Foreign Affiliates.

We use and share personal information to:

### **Provide you with products or services**

- Establish and authenticate your identity and determine your eligibility for products and services
- Help to ensure that the advice, products and services offered to or purchased by you are appropriate for you
- Set up, manage, administer and maintain your products and services

## **Communicate with you**

- Send communications to you by postal mail, email, text message, telephone, automated dialing-announcing device at the numbers you have provided us, fax, other telecommunication channels, social media or other methods. These communications include marketing or service communications about benefits, features or other details about products or services.

## **Provide you with value**

- Personalize your experience with us through data analytics or otherwise, including by reviewing and analyzing your applications, transactions, and other information, to:
  - understand who you are, your financial needs and activities, and the products, services, promotions, offers and advice that may be of interest to you
  - predict or generate insights about your banking needs and preferences
  - determine your eligibility for incentives, such as bonus interest, fee waivers and discounts) to try new products and services or encourage continued use of your existing products and services
  - target or personalize products, services, promotions, offers and advice based on information that we have collected, including information we have collected through your digital activities (for further detail, refer to CIBC's [Digital Privacy Statement](#))
- Promote and market products and services offered by CIBC and CIBC Foreign Affiliates, our program partners or other third parties we have carefully selected
- Better manage and improve your overall relationship with CIBC, including monitoring, reviewing, analyzing or improving client services and business processes to make it easier to do business with us

## **Manage our business**

- Perform our everyday business and operations including recordkeeping or internal reporting
- Understand and better manage CIBC's business and the development of our products and services through market research or analysis of data we hold about you. Refer also to "De-identification and Analytics" below.
- Administer referral arrangements
- Use third-parties to perform services on our behalf
- Insure, reinsure or otherwise protect CIBC's interests in its own product and services portfolio, such as obtaining insurance for CIBC's mortgage loan portfolio or reinsurance to manage CIBC's insurance risk
- Manage CIBC's credit, business and other risks so that CIBC operates as an effective, efficient and financially prudent financial institution
- Meet tax, legal and regulatory obligations
- Protect you and us from error and criminal activity, including the prevention, detection and investigation of fraud, money laundering, cyber threats and other such risks and threats (e.g., we will review and analyze your applications, transactions and other information to help us identify various types of threats and risks such as credit, fraud and money laundering)

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## **Specific ways we may collect, use and share information**

Some of the specific ways we collect, use and share your information within CIBC or with CIBC Foreign Affiliates and other third parties include:

### **To protect you**

Where you might be a victim of fraud, financial abuse or other illegal activity, or where we have reasonable grounds to believe your interests can best be served by taking action, we may share

information with the appropriate legal or governmental authorities, your next of kin or any other appropriate person. For example, notification of our concerns regarding potential financial abuse may be provided to a public guardian or trustee's office). In these circumstances, we will only share information we believe is reasonably necessary to protect your interests.

### **To protect us or where permitted by law**

We share information to protect our rights or interests. For example, where we are involved in judicial, administrative or regulatory proceedings, or other similar processes, including enforcing our rights such as to collect on a debt. We may also share information in order to comply with any legal and regulatory obligations, including any subpoena, warrant, judicial or administrative orders, or valid demands or requests from governments, regulators, courts and law enforcement authorities in Canada or other jurisdictions or countries. We may also collect, use or share information without consent where permitted by law. For example, we may share information with other organizations to investigate a breach of an agreement or law, or to detect, suppress or prevent fraud).

### **Program partners**

We share information with our program partners to help determine your eligibility for a CIBC partner program. If you participate in a CIBC partner program, CIBC and the program partner will share information in order to administer, develop, manage and promote the CIBC partner program, including accrual of points or rewards, reporting on and analyzing the program's performance, developing new benefits, products and services and conducting market research. If you withdraw your consent to this sharing, we may not be able to provide you with the product or service where the sharing is necessary to receive the benefits and features of the CIBC partner program).

### **Joint accounts, representatives and beneficiaries**

Where you hold a product or service jointly with another person, like joint accounts, or where someone is authorized to use or access your product or service such as a credit card, or where liability is shared with others such as someone providing a guarantee or indemnity for your obligations, we may share your information with them (or their representative, which includes their estate representative) in connection with the product or service. Where someone is acting as a representative or we reasonably believe is acting with proper authorization, such as a legal guardian, person having power of attorney, estate representative, lawyer, accountant and, for minor children, parent or guardian, we may share information with and take instructions from them including sharing information as instructed by either representative where representatives are jointly appointed. Following death, we may also share your information with your beneficiaries or estate representatives where reasonably necessary to help in the administration of your registered plans or insurance products or your estate's financial affairs. If you are the surviving joint account-holder, we may also share information about your account created or collected before a deceased joint account-holder's death with the representative of the deceased joint account holder.

### **Insurance**

Where we administer or sell insurance, we collect information on behalf of and share information with the insurance underwriter as their service provider to help sell and administer the insurance, pay claims and resolve complaints. Where we are the insurance underwriter, we share information with necessary people or organizations, such as health care practitioners, medically related facilities, insurance information bureaus, necessary to provide you with insurance products and services. Where we have entered into an agreement with a reinsurer to manage our risk, we share information with the reinsurer. We require the reinsurer to keep this information confidential and limit its use to the purpose of reinsurance.

### **Business transactions**

If we enter into a business transaction involving personal information or are considering one, such as selling or securitizing assets, we may share information with the other parties to the transaction. For example, we may do so as part of due diligence or on completion of the transaction. We require that the other parties keep this information confidential and limit its use to the purposes of the transaction. Where we enter into a business transaction involving the purchase of information by us, this policy will apply to our collection, use and sharing of the purchased information (which may include information we continue

to hold beyond the end of your relationship with us). If we sell assets, the purchaser may be permitted or required by law to retain certain information for a period of time. We may also share your information with the beneficial owner of a product or service we provide to you.

### **Within CIBC and with CIBC Foreign Affiliates**

We may share information within CIBC and with CIBC Foreign Affiliates, to manage your total relationship with us and with CIBC Foreign Affiliates, including opening and servicing your account(s) and maintaining information about you, to make doing business with us and with CIBC Foreign Affiliates easier, such as pre-populating applications, to manage and assess risks and operations including to collect a debt owed by you, to prevent and detect fraud or other unauthorized activity, to offer or promote products and services, to perform analytics, to facilitate internal operational, administrative and support services within our organization and to comply with legal or regulatory obligations. Information shared with CIBC Foreign Affiliates will be subject to the privacy policies of those affiliates and the laws of those countries.

### **Credit bureaus**

Where you hold a credit product such as credit card, loan, line of credit or mortgage with CIBC or a deposit account with overdraft protection or hold or withdrawal limits, we will exchange information about you with credit bureaus on an ongoing basis for as long as you hold the product and for a reasonable time afterwards. This may include information about your current and past credit accounts such as, type, amount, payment history, collections actions, legal proceedings, or other information that the credit bureau has collected from your other lenders. We may collect, use and share this information to verify your creditworthiness, assess and manage our credit risks, establish credit and hold limits, qualify you for other products and services, and detect and prevent fraud. We may also periodically update your information with credit bureaus to help maintain the integrity of the credit reporting system.

### **De-identification and analytics**

We may de-identify or anonymize your information by removing identifiable information such as your name, address, date of birth and account numbers. Such information may be aggregated with other information, and used for internal business purposes such as analytics and reporting, developing and improving our products and services, understanding and predicting client needs and preferences, preventing and detecting fraud, identifying trends like purchasing patterns, fraud trends, or enhancing our marketing.

Information shared with CIBC Foreign Affiliates will be subject to the privacy policies of those affiliates and the laws of those countries.

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## **How do we protect your information?**

At CIBC, we take the protection of your personal information seriously. We make reasonable efforts to prevent unauthorized use, sharing, loss and theft of information. We regularly audit our security measures and assess that they remain effective and appropriate. Our employees who have access to your information are made aware of the importance of keeping it confidential.

Information may be shared with or accessed by our service providers so that they can perform services on our behalf. We are careful when selecting our service providers and require them to have privacy and security standards that meet CIBC's requirements. We use contracts and other measures with our service providers to maintain the confidentiality and security of your information and to prevent it from being used for any other purpose other than that for which it was intended.

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## **Where is your information stored and for how long?**

The length of time we keep your information will vary depending on the product or service and the type of information we have. We keep your information for as long as we reasonably need it for customer service, legal or reasonable business purposes. For these reasons, we keep your information beyond the end of your relationship with us. When your information is no longer required, we securely destroy it or delete

personally identifiable information. Depending on the nature of the information, your information may be stored in the CIBC Banking Centre or office where you regularly do business, in various computer systems or in the record storage facilities of CIBC or our service providers.

Information may be stored and processed in any country where we have affiliates or service providers. By using our products or services, you consent to the transfer of information to countries outside of Canada — including the United States — which may provide different data protection rules. CIBC, service providers and other third parties, including CIBC Foreign Affiliates, with whom we share information under this policy, may perform activities outside of Canada. As a result, your information may be securely used, stored or accessed in other countries and be subject to the laws of those countries. For example, information may be shared in response to valid demands or requests from government authorities, courts and law enforcement officials in those countries.

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## **Your privacy choices**

Subject to legal, business or contractual requirements, you can withdraw your consent to our collection, use or sharing of information at any time upon giving us reasonable notice. However, withdrawing your consent may limit or prevent us from providing you with, or being able to continue to provide you with, specific products and services. For example, if you choose not to provide us with your SIN, we will not be able to provide you with any product where the collection of a SIN is required under tax law, such as a registered product like an RRSP).

In particular, during our relationship with you, we provide you with the following privacy choices:

### **Social Insurance Number (SIN)**

Including your SIN in a credit bureau request is the best way to make sure the credit bureau information accurately refers to you, however, this use of your SIN is optional and, if you choose not to give your permission, this by itself will not prevent you from qualifying for products and services. If you have provided your consent for us to use your SIN for this purpose, you may choose to withdraw your consent at any time.

#### ***If you wish to withdraw your consent to use a SIN as an aid to identify you in credit bureau requests:***

You may choose to withdraw your consent at any time by contacting the CIBC Banking Centre or office where your account is held or talking to your CIBC representative.

### **Marketing**

Subject to applicable law, from time to time CIBC may offer you products and services of CIBC or of CIBC Foreign Affiliates, including special promotions, which may be of interest to you. Your consent to receive marketing communications is optional and you can decide to withdraw it at any time. However, this will not limit the information provided to you through discussions with a CIBC representative or through general CIBC marketing or servicing communications, such as posters in CIBC Banking Centres and electronic messages on banking machines or our website, or information we send you that is related to your existing products or services or is permitted or required by law. We may also, from time to time, communicate with you to ask whether you wish to update your marketing preferences to help ensure that our records are up-to-date and reflect your current preferences.

#### ***If you wish to update your marketing preferences:***

Contact the CIBC Banking Centre or office where your account is held or talk to your CIBC representative or if you are a CIBC banking client, call us at 1-800-465-2422. For other CIBC clients, such as CIBC Private Investment Counsel and CIBC Wood Gundy, refer to one of the contacts in the section for “Addressing any privacy concerns” below. We will then update your file as quickly as possible. It may take some time for our records to reflect your choice. Also note that your choice may not be captured for a promotion already in progress. To manage your digital privacy choices, refer to our Digital Privacy

Statement. You may also opt out of email communications by selecting the “unsubscribe” link included in each of our communications.

### **Call recording**

Telephone calls with CIBC representatives may be recorded and monitored for coaching, training, quality and security (refer to “How we collect information” for further detail).

#### ***If you do not wish to have your telephone calls recorded***

You have the option to conduct your business with us through a CIBC Banking Centre, office or location, through the use of our bank machines, through our Internet banking services or by writing to us.

In certain circumstances, your consent cannot be withdrawn. For example, you may not withdraw your consent where our collection, use or sharing is permitted or required by law, is required to ensure we have correct and up-to-date information about you, such as current address or is necessary to manage our business including the sharing of information when we assign our rights to others for business transactions.

### **Keeping your information updated**

We make every reasonable effort to keep the information in our records as accurate, complete and up-to-date as necessary for the purposes which it is used. However, we also rely on you to tell us when your information changes. Keeping your information accurate and up-to-date allows us to continue to offer you the highest-quality service.

#### ***If you want to update or correct any personal information we hold about you***

Contact the CIBC Banking Centre or office where your account is held or talk to your CIBC representative. If you are a CIBC banking client, call us at 1-800-465-2422 or sign on to CIBC Online Banking®, and where available, edit your information under Customer Services. If you tell us that we have information about you that is obsolete or incorrect, we will update our records as necessary. When appropriate, we’ll correct any information which we may have given to a third party.

### **Accessing your information**

You have the right to access personal information we hold about you. Much of your information is available to you through your paper or electronic account statements, by visiting the CIBC Banking Centre or office where you regularly do business, by accessing your account online or through Telephone Banking.

#### ***If you want access to additional personal information we may hold about you:***

Contact the CIBC Banking Centre or office where your account is held or talk to your CIBC representative.

We will require you to put your request in writing (we can give you a form) and provide us with enough specific details to help us understand your request and conduct our search for your information. We will need you to verify your identity before searching for or providing you with access to your information. We will let you know in advance whether there will be a fee to provide access to your information. We may also ask you for additional information to confirm the scope of your request, such as the relevant time period or a specific description of the information you are seeking to access.

Once we receive your written request, verify your identity and understand the scope of your request, we will provide a written response to your access request in accordance with the time frame prescribed by applicable privacy law.

If you have a sensory disability, you may request your information in an alternative format. If we already have this format, we will provide it. Otherwise, we will convert the information into the requested format if it is reasonable and in accordance with applicable privacy law to enable access. There may be limits on your right to access your information. For example, if the information is subject to legal privilege, contains confidential commercial information, relates to an investigation of a breach of an agreement or law, or contains information of other individuals that cannot be separated).



If we have obtained information about you from others, you can ask us for the source of that information. On request and where legally permitted, we will provide you with the names of third parties to whom we have given or may have given your information. However, this will not include service providers we have used to do work for us. It will also not include reports to the Canada Revenue Agency or information that has been provided for legal and regulatory obligations.

If you request access to a credit report we obtained about you from a credit bureau, we will give you a copy if we still have it on file. We also will provide you with the name and address of the credit bureau we used, as they will have the most current information and can provide you with instructions on how to read the report. You have the right to access and correct the credit bureau report directly with the credit bureau.

### **Addressing any privacy concerns**

If you have any questions, concerns or complaints about this policy or our privacy practices, let us know right away. If you choose to send us an email, don't include sensitive information such as card or account numbers.

You may also request a printed copy of our privacy policy or more details about our privacy policy and practices, including with respect to service providers outside of Canada. Refer to our [CIBC Privacy Principles](#), [Digital Privacy Statement](#) or [Privacy FAQ](#).

***The following steps apply to CIBC Banking Centre clients:***

#### **Step 1: Talk to us**

In most cases, a question, concern or complaint is resolved simply by talking to us about it. You should be able to get swift results by talking to a CIBC representative where you do business.

- **Talk** to a CIBC representative
- **Visit** your nearest CIBC Banking Centre
- **Call** 1-800-465-2422

#### **CIBC Everyday Banking**

1-888-872-2422

Email us at [fraud@cibc.com](mailto:fraud@cibc.com)

#### **CIBC Credit Cards**

1-800-465-4653

#### **Step 2: Contact the CIBC Client Care Centre**

If your question, concern or complaint isn't resolved to your satisfaction, you can contact the CIBC Client Care Centre:

Telephone: 1-800-465-2255

Fax: 1-877-861-7801

Email: [client.care@cibc.com](mailto:client.care@cibc.com)

Write to:

CIBC Client Care  
PO Box 15, Station A  
Toronto, Ontario  
M5W 1A2

Be sure to include your name and contact information where you prefer to be reached, the nature of your complaint, question or concern, details relevant to the matter and the names of any individuals whom you have already discussed the issue with.

### **Step 3: Contact the CIBC Ombudsman**

If your question, concern or complaint has still not been resolved to your satisfaction by Client Care, feel free to contact the CIBC Ombudsman:

Telephone: 1-800-308-6859 or 416-861-3313 in Toronto

Fax: 1-800-308-6861 or 416-980-3754 in Toronto

Email: [ombudsman@cibc.com](mailto:ombudsman@cibc.com)

Write to:

CIBC Ombudsman

P.O. Box 342

Commerce Court

Toronto, Ontario

M5L 1G2

For other CIBC clients, such as clients of CIBC Private Investment Counsel and CIBC Wood Gundy, refer to the escalation process provided to you when you opened your account, contact the CIBC office where your account is administered or speak to your CIBC representative.

### **CIBC Investor's Edge and Imperial Investor Service**

1-800-567-3343

Email us at [CIBCInvestorServicesInc@cibc.com](mailto:CIBCInvestorServicesInc@cibc.com)

### **Private and Investment Counsel**

Contact your Investment Advisor.

### **CIBC Wood Gundy**

Contact your Investment Advisor or call Client Relations at 1-800-563-3193

**For Simplii clients, if you require information about your privacy rights and how to exercise them, please contact Simplii Financial:**

Telephone: 1-888-723-8881

TTY Service: 1-888-632-9022

Email: [talktous@simplii.com](mailto:talktous@simplii.com)

Write to:

Simplii Financial

PO Box 603, Stn. Agincourt

Scarborough, Ontario

M1S 5K9

If the above steps do not resolve your concern, you may consider escalating the matter further.

Office of the Privacy Commissioner of Canada (OPC)

You may contact the OPC to help resolve a privacy concern you have:

Telephone: 1-800-282-1376

Website: [priv.gc.ca](http://priv.gc.ca)

Write to: 30 Victoria Street

Gatineau, Quebec

K1A 1H3

Depending on the nature of your concern, you may also contact [Independent Consumer Support Agencies](#).