

# **TD Tree Days Privacy Policy**

Thank you for trusting us with your information. This Privacy Policy explains how, and why, we handle your personal information and explains your options, where available, to refuse or withdraw your consent.

In this Privacy Policy:

The words "**TD**", "**we**", "**us**" and "**our**" mean TD Bank Group and/or TD Friends of the Environment Foundation.

**TD Bank Group** includes The Toronto-Dominion Bank and its subsidiaries and affiliates 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**" mean any person who wishes to join our TD Tree Days online community and participate in a TD Tree Days event.

The word "information" means your personal information.

### WHY & HOW WE COLLECT YOUR PERSONAL INFORMATION

We need to collect certain information about you that we believe is reasonably necessary for our primary functions and/or activities of TD Tree Days.

Usually, we will collect personal information about you when you provide it to us online via the TD Tree Days website or it is provided to us with your consent (e.g., by way of registration forms completed at an event).

We collect personal information in the course of:

- Registering you as a user of the TD Tree Days website;
- Communicating with you in general and in respect of TD Tree Days near you which you have signed up to attend; and
- Marketing activities such as surveys regarding TD Tree Days and its events after you have agreed to participate in such activities.

Personal information we may collect includes:

- Your legal name, preferred name and contact details;
- If you are a parent/legal guardian registering on behalf of a child, the child's name and age range;
- Whether you are a TD employee or a member of the community;
- Your preferred physical location so we can offer you appropriately located events;
- Audio and Visual content of your participation in any TD Tree Days events;
- How you use our websites and phone services
- The devices you connect from and their settings, including:



- o geolocation (if enabled on your device)
- contact list (with your express consent)
- photos that you submit
- o country code
- o IP address-associated location
- o date and time of your use
- Your consent as to whether or not you allow such content to be used; and
- Information which you volunteered following a marketing exercise such as a survey which you chose to participate in after registering on the TD Tree Days Site and/or participating in a TD Tree Days event.

We will use the preferred name when communicating with you in person, digitally, by phone, and via mail regarding TD Tree Days, unless use of your legal name is necessary.

## **HOW WE USE YOUR PERSONAL INFORMATION**

We use your information for purposes related to TD Tree Days and/or activities, including:

- Co-ordinating a database of registered users of our TD Tree Days website;
- Co-ordinating a database of those users who are interested in participating in TD Tree Days;
- Communicating with our registered users using a variety of different media selected by the users;
- Coordinating the TD Tree Days events themselves, including attendance lists and follow-up emails;
- Promoting TD Tree Days and individual TD Tree Day events; and
- Other administrative purposes such as record keeping, including limited profiles of our users, subject always to your ability to opt out of this profiling either <u>online</u> (<a href="https://www.tdtreedays.com/en-us/unsubscribe">https://www.tdtreedays.com/en-us/unsubscribe</a>) or by contacting us at <a href="mailto:TD.TreeDays@td.com">TD.TreeDays@td.com</a>. The full contact details are set out in the "Contact Us" section below. Our obligations to delete personal information if it is no longer required is also explained below.

#### INTERACTING WITH TD ONLINE

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

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

## **Use of Web Based and Tracking Tools:**

We, and third parties that we select, use certain technologies and tracking tools on our websites to deliver our service, improve and personalize your experience and prevent fraud. 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, Software Development Kits (SDKs) and other technologies. We call these "web based tools".

## **Essential Web Based Tools:**

We use essential web based tools to provide the functionality and security of your online experience, and to help us detect, prevent and investigate fraud. For example, this allows us to remember your language preferences and provide a secure connection.

These tools may collect information about your usage of our website, including your typing and cursor patterns while you are using our secure sites.

You can't opt-out of the use of these tools, but you may be able to disable the ability for your browser to accept them. If you disable them, some of our websites might not work properly and you may not get the best experience. For example, you will not be able to access our secure websites. This is because we use these tools for security purposes on our secure websites.

### **Non-essential Web Based Tools:**

#### Performance

We, as well as third parties we select, collect and use non-essential web based tools to tell us about the performance and usage of our sites. These tools help us to understand which pages you go to most often and if you encounter errors or performance issues. These tools also help us measure and analyze the traffic on our online services by establishing statistics and traffic volumes (e.g., pages visited or features used).

You may review a list of third parties and their privacy policies by using the "Manage Online Experience" preference centre by scrolling to the bottom of the TD webpage and clicking "Manage online experience".

You have choices about how we use non-essential web based tools. To update your preferences, use the "Manage Online Experience" preference centre by scrolling to the bottom of the TD webpage and clicking "Manage online experience".

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.

**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** – When you respond to an online survey, we may use your answers or any opinions or information that you volunteer to improve TD Tree Days or to contact you.

#### **SHARING INFORMATION WITHIN TD**

To help us manage your relationship with us, we share your information within TD (TD Bank Group and TD Friends of the Environment Foundation), in Canada and outside of Canada.

We may share your personal information in other ways if you have expressly consented in advance to that sharing.

We do not rent or sell your personal information to third parties.

#### 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 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

## 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.

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 generally hold personal information within paper or electronic files, including emails. We may in some circumstances store personal information with a third party data storage provider. Your personal information may also be held in a secure archiving facility. We will take reasonable steps to help ensure that all personal information that we hold or is held on



our behalf is protected from misuse and loss and from unauthorized access, modification and disclosure.

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 "Contact Us" below.

TD Tree Days program administrators will have access to log into the website as you (the user) and may log in as you for the purposes of administering the program (for example, to provide you with technical support).

### **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 for which it was collected, used or disclosed. 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 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.

If you wish for us to stop using your personal information, either entirely or for specific purposes (e.g., ask us to stop sending you further TD Tree Day material), please contact us at TD.TreeDays@td.com or via the details set out in the "Contact Us" section below.

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

## **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. Subject to confirming your identity and any other requirements required by law, we will respond to your request within 30 days. 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.

To request access, please contact <a href="mailto:TD.TreeDays@td.com">TD.TreeDays@td.com</a>. The full contact details are set out in the "Contact Us" section below.

### **CORRECTING YOUR PERSONAL INFORMATION**

We make reasonable efforts to keep your personal 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.

#### **CONTACT US**

If you have questions on this Privacy Policy, would like more information about how we manage your personal information, or would like to request access to or correction of your personal information, please contact:



Email: TD.TreeDays@td.com

#### Mail:

66 Wellington Street, 30th Floor, Toronto, Ontario M5K 1A2

Attn: National TD Tree Days Coordinator

## **RESOLVING A COMPLAINT**

We take your concerns seriously. We work hard to help resolve any privacy complaint. If you wish to raise any privacy concerns, including concerns about a breach or potential breach of your privacy, please contact the National TD Tree Days Coordinator in writing on the details set out above. We will make every effort to resolve your complaint internally and within a reasonable timeframe, escalating it where appropriate. We will inform you of the outcome of our resolution of your complaint.

If you are not satisfied with the outcome of your complaint, you may be able to lodge a complaint with the federal privacy regulator. You may contact:

• The Office of the Privacy Commissioner of Canada

Website: <a href="https://www.priv.gc.ca">www.priv.gc.ca</a>
Phone: 1-800-282-1376

Mail: 30 Victoria Street, Gatineau, QC K1A 1H3

## **MORE INFORMATION**

We may change this Privacy Policy from time to time. The current Policy will be available on our website <a href="https://www.tdtreedays.com">https://www.tdtreedays.com</a>.

If you have any questions on this Policy, please contact us at TD.TreeDays@td.com.

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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