

BMO Privacy Code – United States

Effective Date: January 1, 2020

OUR COMMITMENT TO YOU

BMO Harris Bank N.A. and its U.S. affiliates (“BMO”, “we” or “us” or “our”) are committed to respecting and protecting the privacy and confidentiality of personal information you have entrusted to us. The practices described in this Privacy Code are subject to applicable laws in the states in which we operate. They are also subject to other applicable privacy policies and notices, including our [Privacy Notice](#), [Digital Privacy Policy](#), and [CCPA Privacy Policy](#).

This Privacy Code applies to the operations of BMO in the United States, regardless of how you choose to do business with us – in our branch or office, at an automated banking machine, online, or by telephone, and governs how we manage and use your “Personal Information,” which means information about an identifiable individual. It includes information such as your name and address, age, personal financial records, identification numbers including your Social Security Number, personal references, and employment records. The Privacy Code is based on our 10 key privacy principles, which are set forth below.

BMO PRIVACY PRINCIPLES

This Privacy Code outlines our commitment to you and incorporates the following 10 key privacy principles:

1. [Accountability](#)
2. [Identifying Purpose](#)
3. [Consent and Your Choices](#)
4. [Limited Collection](#)
5. [Limited Use and Disclosure](#)
6. [Retention](#)
7. [Accuracy](#)
8. [Safeguards](#)
9. [Openness](#)
10. [Individual Access](#)

OTHER PRIVACY RESOURCES

U.S. Privacy Notice

Our [Privacy Notice](#) contains information about how we use customers’ Personal Information.

Online and Mobile Privacy

For information about our online and mobile practices, please see our [Digital Privacy Policy](#).

California Consumer Privacy Policy (for California residents)

If you are a California resident, please see our [California Consumer Privacy Policy](#).

Online Security Center

BMO is dedicated to maintaining information security to safeguard your Personal Information. To learn more about how we prioritize your security, please visit our [Security Center](#).

1. ACCOUNTABILITY

We have policies and procedures governing how we handle your Personal Information. Each of our employees is responsible for respecting and protecting your Personal Information. Our Chief Privacy Officer oversees privacy governance including policy, dispute resolution, education, communications, activities, and reporting to our Board of Directors on privacy matters. Please see Contact Us for information on how to contact our Privacy Office.

2. IDENTIFYING PURPOSE

When we collect your Personal Information, we may use or disclose it to:

- verify your identity;
- ensure we have correct or up to date information about you;
- provide and manage products and services you have requested or accepted;
- understand your financial services requirements;
- report to consumer credit bureaus and business reporting companies;
- protect against fraud, and manage credit risk and other business risks;
- determine suitability of products and services for you;
- better manage your relationship with us;
- determine your eligibility for certain of our products and services, or products or services of others;
- comply with legal or regulatory requirements, or as otherwise permitted by law;
- communicate with you regarding products, services, and offers that may be of interest;
- understand our customers and to develop and tailor our products and services; and/or
- respond to any questions you may have.

If a new purpose for using your Personal Information develops, we will identify that purpose.

3. CONSENT AND YOUR CHOICES

All financial companies need to share customers' personal information to run their everyday business. As part of those activities, we may from time to time engage in direct marketing, which is communication with you via mail, telemarketing or email to inform you about products and services that we think may be of interest and value to you. This does not include communications regarding products or services that you currently have, including improved ways to use the products, or additional features of the products as well as transactional information. You can manage your direct marketing preferences to opt out of certain marketing communications. You may also choose to opt out of having certain account-specific information shared with other BMO entities. Customers may refer to our [Privacy Notice](#) for more information.

4. LIMITED COLLECTION

We only collect the Personal Information that we determine we need for the purposes set out in Principle 2, Identifying Purpose.

For example, we may collect personal identifiers, commercial information, and other data, including:

- **Contact Information** including address, telephone number and email address.
- **Social Security Number (SSN)** as required in order to comply with the legal and regulatory requirements. You may provide your SSN to ensure an accurate match between your Personal Information and credit bureau information and to help us differentiate customers who may have the same or similar name.
- **Financial Information** to ensure that the advice, services, and/or products we provide to you are appropriate for you.
- **Device Information** such as information about your operating system, browser, software applications, IP address, geolocation, security status and other device information in order to improve your experience, to protect against fraud, and manage risk.
- **Website Use Information** such as browsing behavior on BMO sites and links, location you click, form data and downloads as well as other data gathered from the use of web tools (for example, Cookies, Web Beacons, Tagging) to better understand your interests and needs so that we can serve you better. For more information, see our Online and Mobile Privacy Policy at bmoharris.com/privacy.
- **Information Used to Verify Your Identity** such as your responses to certain challenge questions, voiceprint, or other personal information we may use strictly for the purpose of verifying your identity.
- **Employment Information** including information about your previous and current employers, to confirm your eligibility for certain products and services.
- **Health Information** as required for some of our insurance products.

We may collect Personal Information about you from you and from third parties or sources that are available to the public, to satisfy legal requirements or regulatory expectations, and/or to manage our risk and to help us understand our customers in order to develop and tailor our product and service offerings.

We may monitor or record our incoming or outgoing telephone calls with you to ensure accuracy, security, service quality, for training purposes and to establish a record. If you do not wish to have your call recorded, you have other options to conduct business with us such as at one of our branches or ATMs, online, or by contacting us in writing.

We may use video surveillance in and around our branches, ATMs and other locations for the safety of our customers and employees, and to protect against theft, property damage and fraud.

5. LIMITED USE AND DISCLOSURE

We will only use or disclose your Personal Information for the purpose(s) it was collected and as otherwise identified in this Privacy Code. Personal Information may be released to third parties including legal or regulatory authorities in certain cases, such as of suspected criminal activity or contravention of law, for detection and prevention of fraud, or when required to satisfy the legal or regulatory requirements of governments, regulatory authorities or other self-regulatory organizations, and/or to

comply with court order(s) or for the protection of our assets (for example, collection of overdue accounts).

We may share your Personal Information with other BMO entities, including locations outside of United States where we do business, for the purposes described in Principle 2 – Identifying Purpose. You can manage your marketing preferences to opt out of certain marketing communications. Pursuant to certain federal and state law(s), you may also be able to choose to opt out of having account-specific information shared among other BMO entities. See Principle 3 – Consent and Your Choices.

We do not sell your Personal Information. We do not disclose our customers' names or Personal Information to other companies outside of BMO without consent unless required or permitted by law or pursuant to an agreement. Over time, we may buy new businesses or sell some of our businesses. Accordingly, Personal Information associated with any accounts, products or services of the business being purchased or sold will be transferred as a business asset to the new business owner. We may also transfer Personal Information as part of a corporate reorganization or other change in corporate control.

We may use affiliates or other companies to provide services on our behalf such as data processing, account administration, analytics and marketing. Such companies will be given only the Personal Information needed to perform those and other essential services. We have contracts in place holding these companies to the same standards of confidentiality by which we are governed. In some cases, these other companies may be located outside of United States (such as in Canada) and may be required to disclose information to courts, government authorities, regulators or law enforcement in accordance with applicable law in that country.

6. RETENTION

We have policies in place that govern the retention of your Personal Information so it will be kept only for as long as reasonably necessary to fulfill its intended purpose or to satisfy legal requirements.

7. ACCURACY

We are committed to maintaining the accuracy of your Personal Information and ensuring that it is complete and up-to-date. If you discover inaccuracies in our records, or your Personal Information changes, please notify the branch or office where you do business immediately so that we can make the necessary changes. Failure to notify us of changes to your Personal Information may negatively impact the way we communicate or provide services to you. Where appropriate, we will advise others of any material amendments to your Personal Information that we may have released to them.

8. SAFEGUARDS

We use physical, electronic, and procedural safeguards to protect against unauthorized use, access, modification, destruction, disclosure, loss or theft of your Personal Information in our custody or control.

We have agreements and controls in place with credit bureaus, credit insurers, other lenders and third party service providers requiring that any information we provide to them must be safeguarded and

used only for the purpose of providing the service we have requested the company to perform. To learn more about our security controls, please visit our [Security Center](#).

9. OPENNESS

From time to time, we may make changes to this Privacy Code. The U.S. Privacy Code at bmoharris.com/privacy is always the most recent version. Please see **Contact Us** if you have any additional questions about our Privacy Code.

10. INDIVIDUAL ACCESS

Under certain law(s), some of our customers (such as California residents) may be entitled to request to review Personal Information. California residents should review our [California Consumer Privacy Policy](#) for more information.

CONTACT US

If you have any questions or concerns about our privacy practices, the privacy of your Personal Information or you want to change your privacy preferences, please let us know by contacting us at privacy.matters@bmo.com. You can also raise questions or concerns about our privacy practices by visiting one of our branches.

