NATIONAL BANK

Privacy Booklet

2024

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OUR ONE MISSION

We exist to have a **POSITIVE IMPACT** in people's lives.

By building ***long-term relationships*** with our clients, teams, shareholders and our community.

People first.

Why do we need a One Mission?

Our One Mission is aligned with our continued efforts to drive social and economic development. In response to changing trends in the banking industry, we've adopted a people-first approach that will help us achieve our objectives and boost our collaboration with stakeholders.

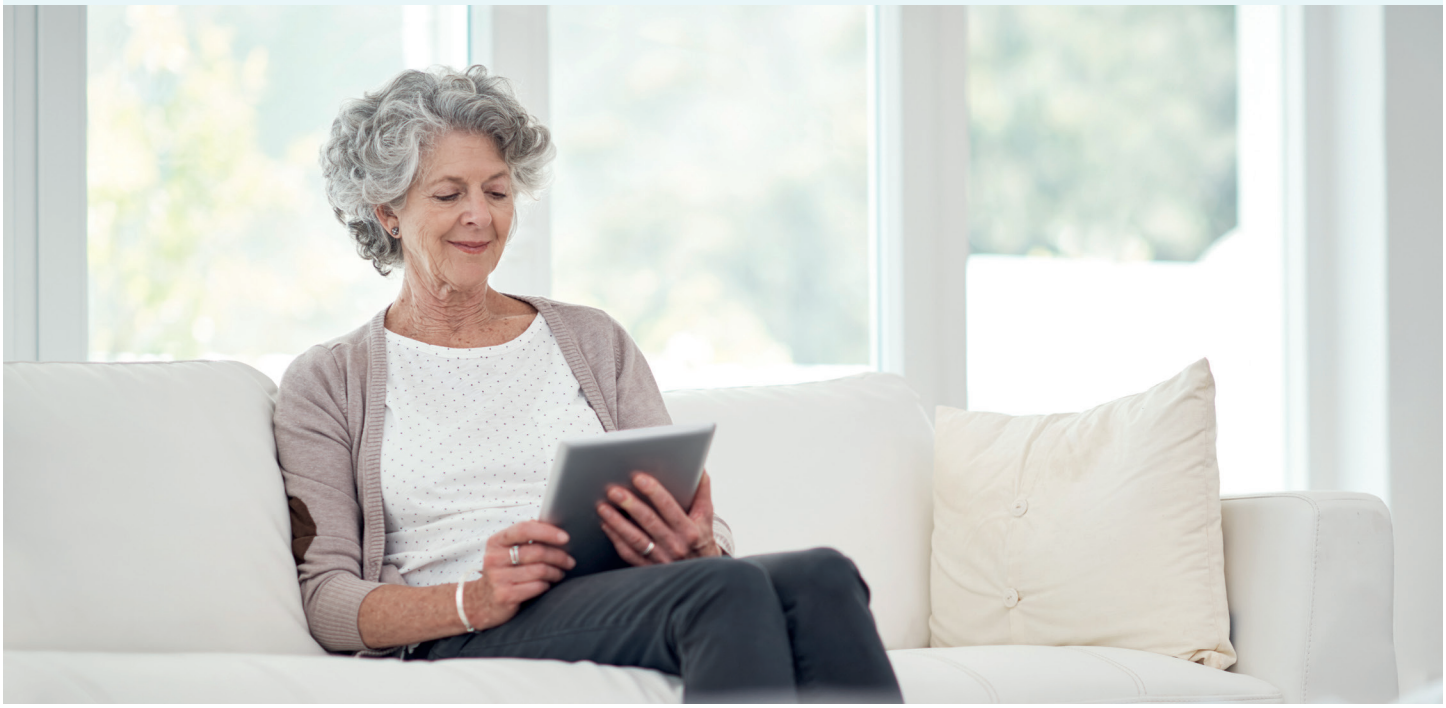
How is our One Mission put into practice?

- Through the experiences we want to deliver to our clients, our employees and the communities we serve.
- Through behaviours that reflect our values: partnership, empowerment and agility.
- Through the way employees work together to boost client satisfaction, employee engagement and community involvement.
- Through the initiatives we prioritize to have a positive impact.

About This Booklet

This booklet on privacy is produced by National Bank of Canada's Privacy Office. It demonstrates our commitment to to transparency and to using your personal information responsibly. This booklet also addresses the role of the Privacy Office in developing our program to oversee the use of artificial intelligence.

The protection and responsible use of personal information are among the Bank's priorities. Over the years, measures have been put in place to reinforce our practices and earn your trust. These practices are set out in this booklet. We will keep you informed of any related progress and results on an annual basis.



Scope

The information in this booklet covers the activities of the Bank and its main Canadian subsidiaries[1] for the period from November 1, 2023, to October 31, 2024.

Who it is for: stakeholders

This booklet has been prepared to help our stakeholders understand our privacy program. It reflects a summary of our program, privacy practices, policies and standards and our voluntary disclosure efforts. This booklet aims to foster an ongoing dialogue between the Bank (including its directors and officers) and its clients, employees, shareholders and service providers as well as communities, interest groups and regulatory authorities.

This dialogue helps us enrich our practices and aim for the most advanced privacy and disclosure standards.

1 The information provided in this report does not include Flinks Technology Inc.

Our Commitment

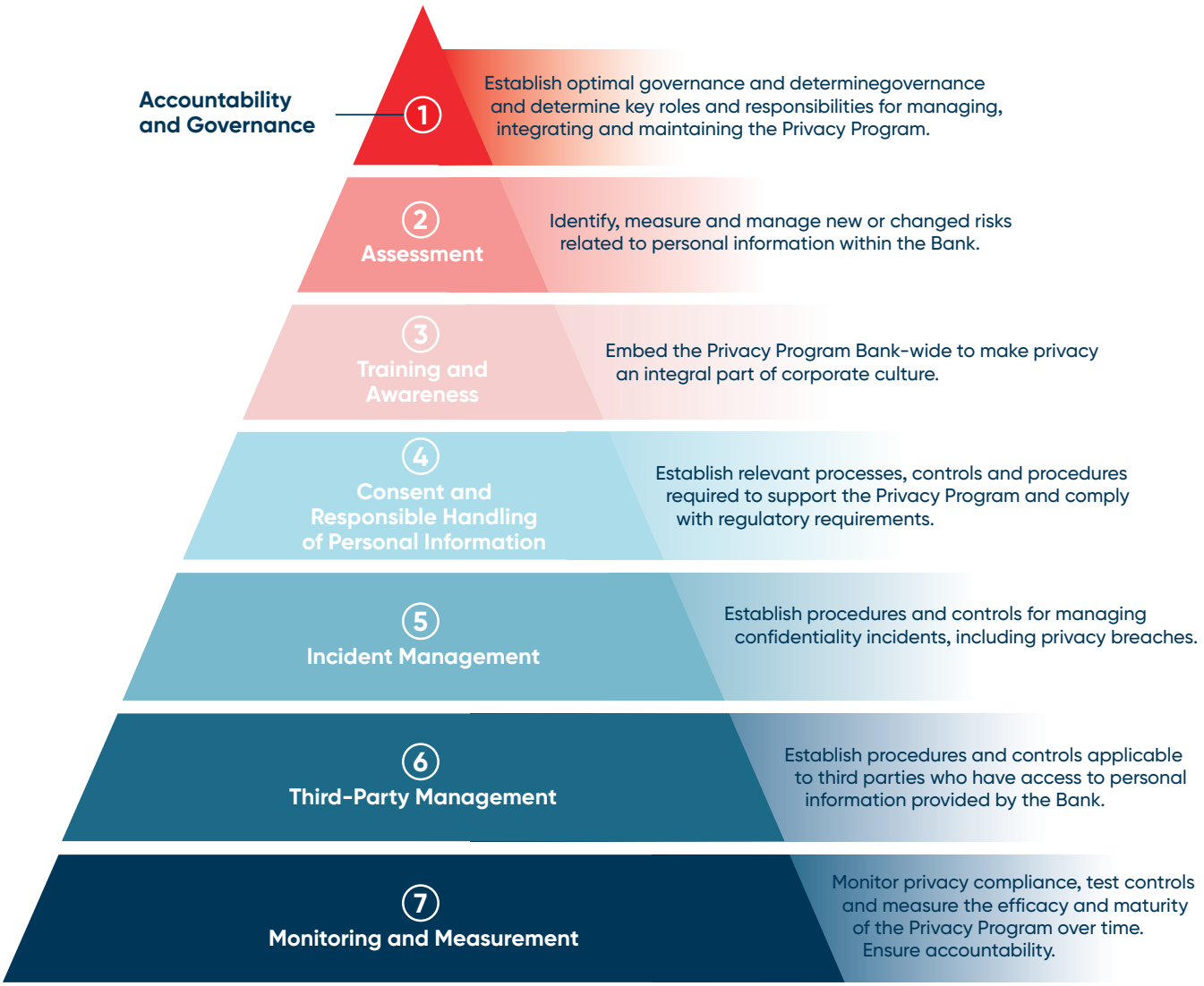
We do our utmost to ensure the protection of your personal information. All of our employees work together towards this goal.

Our commitment to you is simple: to maintain a relationship of trust.

Our commitment is aligned with the Governance component of our Environmental, Social and Governance (ESG) principles, which have been approved by the Bank's Board of Directors. Our commitment to privacy contributes to advancing the United Nations (UN) Sustainable Development Goals, and goal 16 in particular: Peace, Justice and Strong Institutions. We have put in place a governance framework for the protection of personal information to ensure that we safeguard your data and maintain a relationship of trust with you.

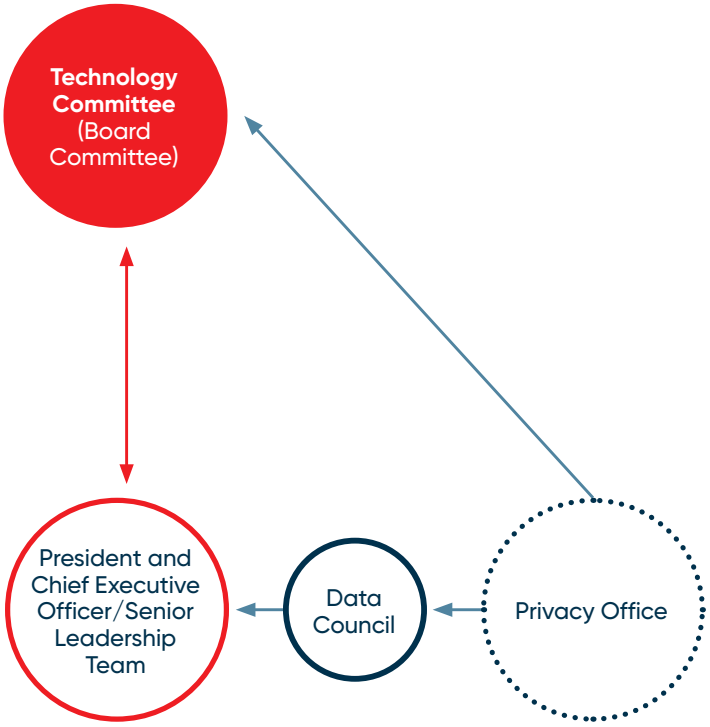
Our Privacy Program

The protection of individuals' personal information (PI) is crucial to accelerating our business model and strategies. Indeed, complying with the various privacy requirements as well as managing and safeguarding personal information appropriately are the basis of the relationship of trust with all our stakeholders. Proper management of personal information preserves and increases this relationship of trust, creates value for our clients and organization as well as reduces the risks associated with the processing of personal information. Our Privacy Program, which enables us to achieve these goals, is based on the following seven pillars:



Pillar 1: Accountability and Governance

We have adopted a robust governance framework that defines the roles and responsibilities of our various teams to ensure the management, integration and maintenance of our Privacy Program throughout the organization.



Privacy Office

The Privacy Office is headed by the Chief Privacy Officer, who reports to the Senior Vice-President, Legal Affairs and Corporate Secretary of the Bank.

The Privacy Office develops and implements our Privacy Program and privacy strategy. It oversees:

- the development, updating and implementation of relevant documents in support of our Privacy Program, such as our policies, standards and procedures;
- the privacy risk governance framework; and
- the establishment of appropriate controls for risk mitigation.

The Privacy Office's responsibilities also include:

- ensuring the protection and responsible handling of personal information, as well as compliance with applicable laws;
- supporting the Bank's business sectors in carrying out the adopted strategic orientations;
- proactively monitoring any new legislative requirements regarding the protection of personal information and artificial intelligence and ensuring compliance with best practices;
- analyzing emerging issues that may affect our internal practices and our commitments to you;
- making recommendations to various decision-making levels; and
- participating in the socialization of various reform initiatives related to privacy and the oversight of artificial intelligence.

The Privacy Office periodically presents the various committees with:

- reports on privacy risks and the status of strategic initiatives; and
- new facts as well as emerging trends that may impact current practices.

Furthermore, the Privacy Office participates in the development and implementation of a program to oversee the use of artificial intelligence within the organization. In this capacity, it collaborates on:

- developing policies, standards and procedures to manage risks related to artificial intelligence;
- assessing risks related to artificial intelligence by establishing multidisciplinary evaluation processes;
- creating a multidisciplinary team to support and assist initiatives involving artificial intelligence;
- establishing an accountability framework within the lifecycle of artificial intelligence systems; and
- developing a guide for our employees on the use of generative artificial intelligence.

The Board of Directors and the Technology Committee

The Bank's **Board of Directors**, through **the Technology Committee**, ensures that the Bank's technology strategy is implemented and that the oversight and management of technology risks, including cyber risks, cybercrime and the protection of personal information, are properly applied and carried out. The roles and responsibilities of the Board of Directors and the Technology Committee are described more fully in their respective mandate. Their mandates and main achievements (available in the Bank's most recent management proxy circular) can be respectively consulted in the subsections of the nbc.ca website devoted to governance and investors, under the "About Us" tab.

The Data Council

The **Data Council** is composed of Bank executives. It is tasked with establishing the Bank's strategic directions for data management, including personal information, by promoting a balance between value creation and sound risk management. This Council approves the strategy, usage principles and data governance model. It also confirms corporate positions related to data issues that have a significant impact on the Bank, its clients or its employees.

The Executive Officers

The President and Chief Executive Officer and the senior leadership team approve the main strategic orientations and priorities relating to the protection of personal information. They are ambassadors within the organization and to the Bank's Board of Directors with regard to the protection of personal information.

Strengthening our Governance Through Privacy Champions

As an institution, we are committed to creating a culture dedicated to protecting your personal information, one that resonates across all functions in our organization. In order to strengthen our governance, we have appointed "privacy champions" who support the Bank's initiatives involving personal information to leverage privacy in business strategies. They are, in a manner of speaking, the eyes and ears of the Privacy Office on the ground.

The role of the privacy champion is to:

- support business sectors with the development and implementation of projects, processes and controls to ensure sound management of personal information;
- identify business issues as well as any awareness and training needs for the business sectors they support; and
- support business sectors when assessing privacy-related risks.

We are working to evolve the role of the privacy champions so that they can support business sectors in their responsible use of artificial intelligence and thereby strengthen our governance in this area.

Protecting Personal Information, a Shared Responsibility

The protection of personal information is the result of the collaboration and combined efforts of several business sectors and internal committees. Our personal information governance involves a **reporting process that enables** us to gauge the effectiveness of our practices so we can make decisions based on our commitment to you, our risk appetite and our ambition to offer you innovative products and solutions.

Pillar 2: Assessment

At the Bank, we have established processes to identify, assess and manage privacy risks, whether they are new or evolving. Our operational teams stay informed about privacy issues in their respective areas. They are also responsible for identifying, assessing and addressing privacy matters.

Ongoing Risk Assessments

The Privacy Office oversees several ongoing privacy risk assessments. For example, it supervises assessments concerning:

- the privacy risks associated with each sector of the Bank;
- the handling of privacy complaints;
- the management of privacy incidents; and
- the integration of third parties and vendors.

The Privacy Office ensures that privacy risks are consistently identified, assessed and managed within the organization.

Privacy Impact Assessments

The Bank has developed a rigorous process that allows it to assess privacy factors from the outset of its new initiatives or their updates. This process aims to ensure a clear understanding of privacy risks related to an initiative and to mitigate those risks. The process is completed by our operational teams, in collaboration with the privacy champions and Privacy Office.

This process involves three steps:

1. A preliminary assessment of the initiative to determine its level of privacy risk.
2. Where required, a detailed assessment of the initiative's privacy impact and the identification of controls to mitigate the risks.
3. The implementation of the identified controls.

The Privacy Office ensures that privacy remains a central priority from the very inception of initiatives.

Assessments of Cross-Border Data Movements

If it is necessary to move data across borders as part of our activities, we make sure to comply with applicable laws and best practices in this area. Risk assessments are carried out taking into consideration the various legal and regulatory requirements, the legal and socio-political context of the recipient countries, and the volume and sensitivity of the information shared. This is done to ensure that a degree of protection comparable to the country of origin can be offered.

Assessments of Fairness Factors

Technological transformations, especially those related to artificial intelligence and advanced analytics technologies, are drawing more and more attention. As an organization, we are mindful of the effects that these technologies can have on rights and freedoms as well as on our ability to positively transform the experience of our clients and employees.

We therefore proactively assess our practices to make sure that the technologies we deploy are aligned with our values. For example, our fairness by design program enables us to strengthen our artificial intelligence and advanced analytics activities.

This cross-sector program provides for concrete measures that help reinforce best practices in equity. In this context, awareness and training activities were held within the different sectors of the Bank, for business development, supervisory and scientific teams as well as for employees of the second and third lines of defense. Performance indicators are in place to monitor our equity practices. For example, we track the effective adoption rate of the program by the analytical solutions that we have put into production in the last year. As of October 31, 2024, we have exceeded our adoption rate target of 90%.

Pillar 3: Training and Awareness

Our approach is as follows:

1. Mandatory training for new employees that makes them aware of the importance of privacy for the Bank and our clients, and equips them to protect it.
2. Annual mandatory privacy training, with a different theme each year to enhance employees' knowledge in this area.
3. Continuously raise awareness through training modules and activities to keep employees informed.
4. Targeted training to support certain business sectors—for example, when deploying a new initiative or improving processes.

Our goal is to have **employees who are engaged and aware** of the importance of protecting your personal information. Training is offered at all levels of our organization.

Training is updated periodically to meet new regulatory requirements and best practices. Our Code of Conduct also reinforces the importance of protecting personal information.

Mandatory Onboarding Training: NBC's Privacy Commitment

In 2024, this training was completed successfully by new employees. The completion rate for mandatory onboarding training exceeds 99% annually.

Mandatory Annual Training: Proper Use of Personal Information

95% of active employees completed the training.

In 2023, the training regarding our privacy governance framework and the roles and responsibilities of employees with respect to the protection of personal information was **completed by 96% of active employees**.

Additional training on the fundamentals of personal information protection

This training aims to inform our employees about the fundamental principles related to the protection of personal information, such as consent, data collection limitation and stransparency.

This optional training is accredited by the Chambre de la sécurité financière, the Institute of Financial Planning, the Canadian Investment Regulatory Organization and FP Canada.

Pillar 4:
Consent and Responsible Handling of Personal Information

We develop and implement reliable processes to handle your personal information responsibly in accordance with your expectations and applicable laws.

How we uphold your rights throughout the life cycle of your personal information

- **Collection:** We limit the collection of your information to what is necessary to help us serve you properly.
- **Use:** We use your information in accordance with our Privacy Policy and our Digital Data Policy.
- **Communication:** At all times, we are committed to limiting the communication of your information to what is necessary.
- **Retention:** We retain your information for as long as necessary to fulfill the purposes for which the information was collected or as long as required or permitted by law. Our legal obligations, the purpose for collecting the information as well as the nature and the sensitivity of the information have been considered in determining retention periods. We have reviewed and simplified our retention periods to clarify the triggering event of the retention period.
- **Destruction:** When your information is no longer needed, we endeavour to securely destroy it.

The documentation we provide to you:

In the spirit of transparency, we have published two policies that describe our practices related to the handling and protection of your personal information:

- The Privacy Policy
- The Digital Data Policy

We have developed these policies with you in mind. Your consent is the cornerstone of our practices; we respect your choices and act on the consent you have given.

Privacy Policy

This policy explains, among other things:

- what types of personal information we may collect and the reasons for collecting it;
- how we can use and share your information and with whom;
- the choice you have in consenting or not to certain uses of personal information; and
- our approach to protecting, retaining and destroying your personal information.

The policy also informs you about your rights to:

- access the personal information we have about you and request its disclosure;
- correct your personal information to ensure its accuracy;
- be informed when we make an exclusively automated decision about you (without human intervention), such as in response to certain credit or financing requests; and
- opt out of receiving our product and service offers and other promotional communications at any time.

Digital Data Policy

This policy explains, among other things:

- the types of information we collect using cookies and other similar technology;
- the purposes for which we collect this information;
- your right to refuse and how to exercise it or change your preferences.

For more information about our practices, please see our Privacy Policy and our Digital Data Privacy available at nbc.ca.

Management of Individual Requests Regarding Personal Information

In general, when you make a request to access or correct your personal information, our employees respond as promptly as possible after authenticating your identity. If your request is complex or requires extensive searches in our systems, it will be forwarded to the Privacy Office. When the Privacy Office receives such a request, it makes the necessary efforts to conduct a thorough and complete search and respond within 30 days following your authentication. If you are not satisfied with the response received, you have recourse before the Office of the Privacy Commissioner of Canada or provincial privacy regulators, where applicable.

If you prefer to navigate online, our automated solution will allow you to quickly obtain the relevant personal information we hold about you, as well as details about your products and services at National Bank. To do so, log in to your online banking account, access your profile, select *Privacy Settings*, then choose *Request access* and follow the instructions. Your information will be placed in the secure document-sharing space, called My Document Exchange, within 30 days.

Complaint Management

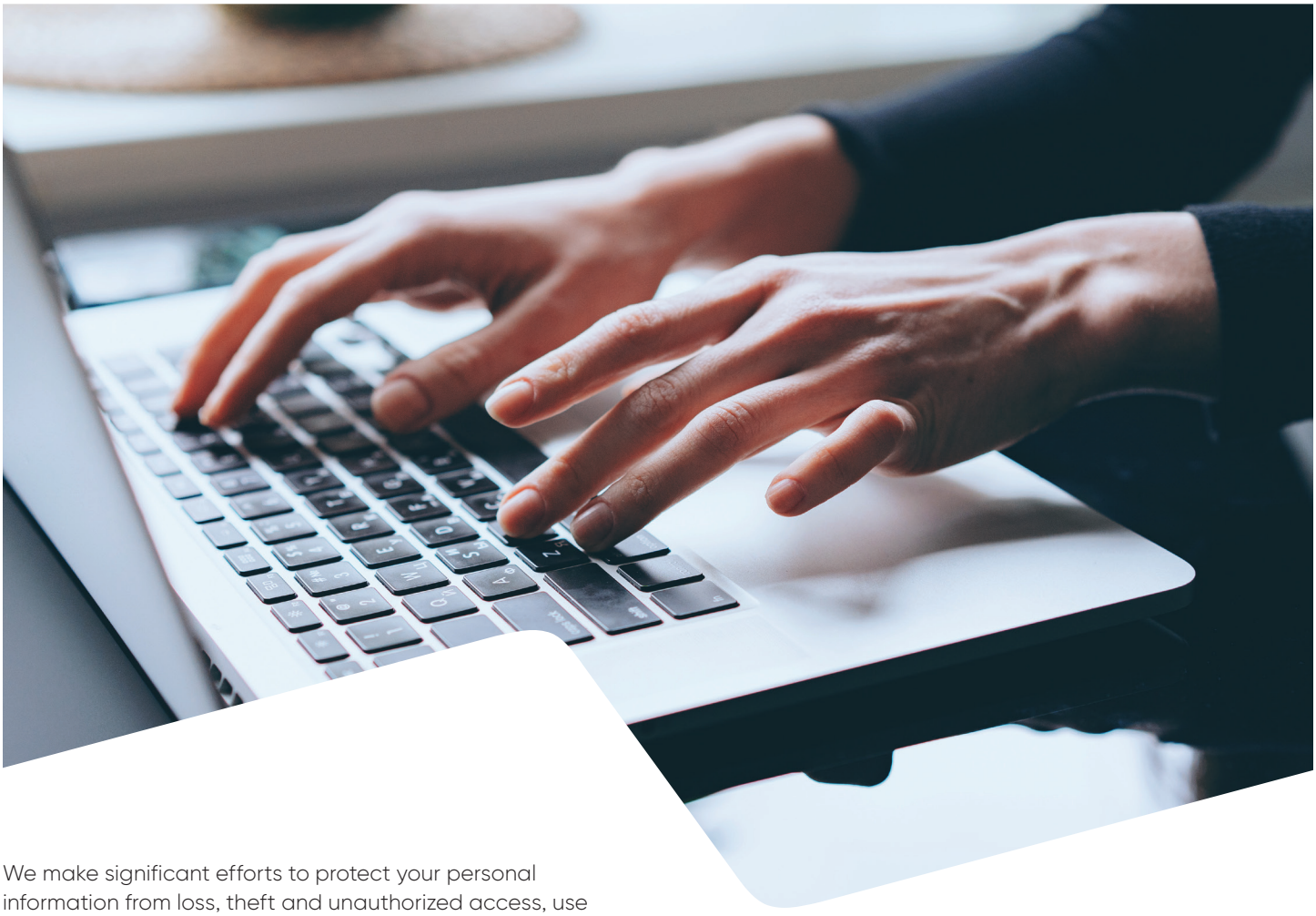
The Bank wants to be transparent about how it manages your personal information, in addition to ensuring that it is handled responsibly. Your complaints and dissatisfactions relating to the protection of personal information are taken seriously. In order to quickly find solutions that suit you, the Bank has developed and maintains complaint-handling processes relating to the protection of personal information and trains its employees to manage this type of complaint in accordance with the procedures in place.

Our employees and the Privacy Office work together to answer your questions about the protection of your personal information, to guide you and to find solutions that are right for you.

> You have several simple options to communicate your concerns and complaints to us.

To make a complaint, you must follow the procedures outlined on our website at nbc.ca, under About us > Useful links > Complaint settlement online.

Pillar 5:
Incident Management



We make significant efforts to protect your personal information from loss, theft and unauthorized access, use or disclosure. We have practices in place that allow us to identify and fully understand our risks, as well as a security program in place to keep pace with changing information security threats. The measures adopted in our security program include:

- protecting the infrastructure through secure access to our premises and secure locations for our equipment, etc.;
- limiting who has access to your information, meaning that only employees who need to know your information in order to carry out their duties have access to it;
- managing passwords and setting up firewalls; and
- conducting security verifications at the time of hiring on all Bank employees.

If an incident were to occur and present a serious risk, you would be personally informed within the time limits provided by law. Additionally, the Bank would ensure that relevant regulators, as well as any individuals or organizations that could help reduce the risk of harm, are informed.

Pillar 6: Third-Party Management

Relationship With our Service Providers and Business Partners

The safety of your personal information is important, including when it must be sent to third parties. We take great care in choosing our business partners and service providers and have a third-party risk-management procurement process.

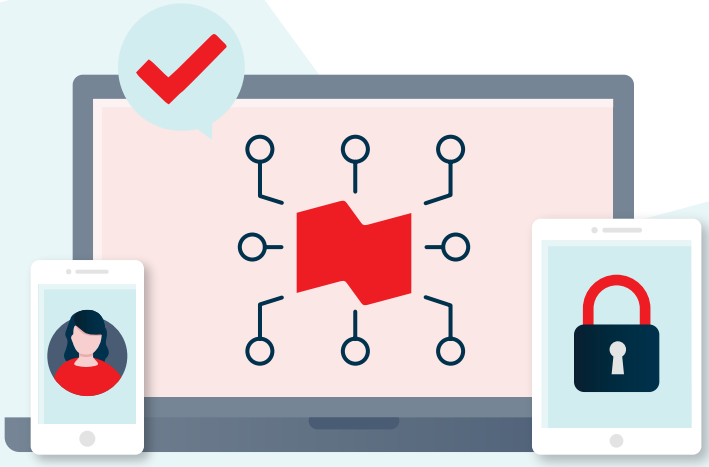
When it is necessary to use a service provider or a business partner who will hold information (including personal information) for which we are responsible, our process is applied and the elements related to the protection of personal information are integrated into all stages of the life cycle of a service provider or business partner.

The life cycle of a service provider or business partner

Under no circumstances do we sell client lists to third parties.

- **Materiality Assessment:** We perform a materiality assessment that includes privacy risk-related questions.
- **Due-Diligence Review:** We initiate a due-diligence process that includes a security and privacy review.
- **Negotiation of Agreements:** Our service providers or business partners may only use personal information in a responsible manner; they agree to use only the personal information required to provide their service and must be as diligent and cautious as we are to ensure the security of your personal information.
- **Agreement Management:** We ensure the right oversight mechanisms are in place to monitor, among other things, compliance with security and privacy requirements. We also require that our service providers and business partners notify us of any privacy incidents so that we can work together to respond, remedy and, if applicable, report them.
- **Agreement Renewal, Expiry or Termination:** If we decide not to renew the agreement with our service provider or business partner, the Bank and its service provider or business partner comply with the relevant contractual clauses, in particular those relating to the retrieval and the destruction of personal information.

Pillar 7:
Monitoring and Measurement



The Bank monitors its Privacy Program by testing certain controls and using metrics to assess their effectiveness over time.

Each business sector is responsible for monitoring the effectiveness of the controls in place to ensure the protection of personal information within its operations. The Privacy Office also performs ongoing oversight of the organization's practices to ensure compliance with privacy requirements. Additionally, the Privacy Office identifies and monitors privacy-related laws and regulations and ensures the implementation of new requirements within the organization.

Our Performance in 2024

Our practices are evolving, and we are continuously improving our performance indicators to better assess the quality of our practices. Our goal is to improve the effectiveness of our strategies and operational processes.

We have implemented an indicator based on the number of decisions made annually by regulators regarding the Bank.

	Annual target	Result in 2024
Decisions regarding personal information involving the Bank	0	0

Questions or Comments?

Your feedback is important to us. We are committed to following up on it in a straightforward manner so you can understand how we handle your personal information.

If you have any questions or comments, please contact:

1. **Your branch's Customer Service Manager**

2. **The Chief Privacy Officer** at:
   confidentiality@nbc.ca
   or
   National Bank Place
   800 Saint-Jacques Street
   Montreal, Quebec, Canada H3C 1A3

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