



# CUSTOM HOUSE



# GLOBAL PRIVACY POLICY

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# Custom House Global Privacy Policy

Custom House Ltd., and its subsidiaries, Custom House Financial (UK) Ltd. (United Kingdom); Custom House Currency Exchange (Australia) Pty Ltd. (Australia); Custom House (NZ) Ltd. (New Zealand); Custom House Currency Exchange (Singapore) Pte Ltd. (Singapore); Custom House Spa (Italy); and Custom House (USA) Ltd. (United States), hereinafter collectively referred to as "Custom House", is the largest non-bank foreign exchange company in North America. They provide a complete range of foreign exchange tools and services to a wide variety of clients including both public and private corporations encompassing such diverse industries as farming, manufacturing, importing/exporting wineries and cattle brokering. Custom House offers corporate services such as foreign drafts, international wires, forward contracts and has two online services that permit online foreign exchange trading.

Custom House operates globally with over 83 offices employing over 600 employees in Canada, Australia, the United States, the United Kingdom, Italy, New Zealand and Singapore.

Custom House takes compliance, regulatory and legal obligations seriously. Through the activities and programs of their Compliance Department, Custom House protects both their own corporate assets and those of their clients. As part of their compliance program, Custom House has developed policies and procedures related to the protection of personal information in response to the requirements imposed by a variety of statutes. These statutes are:

- Personal Information Protection Act (British Columbia)
- Personal Information Protection Act (Alberta),
- An Act Respecting the Protection of Personal Information in the Private Sector (Quebec),
- Personal Information Protection and Electronic Documents Act (Canada),
- Data Protection Act 1998 (United Kingdom)
- Gramm Leach Bliley Act (United States)
- Legislative Decree no. 196/2003 (Italy)
- Privacy Act (Australia)
- Privacy Act (New Zealand)

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## **CUSTOM HOUSE**

### **Scope**

This statement applies to Custom House and its Online Services. Our full Privacy Policy can be viewed at Custom House Privacy Policy.

### **Personal Information**

Personal information is information about an identifiable individual. It includes information such as name, address, telephone number, email address and information related to your financial transactions with Custom House.

In order to provide services, Custom House collects, uses, discloses and retains personal information about you. Custom House only collects, uses, discloses or retains the most limited amount of personal information that will allow us to provide services to you.

Custom House will identify the purposes for which personal information is collected from you and subsequently used or disclosed at or before the time the information is collected. Please see our [Identifying Purpose Policy](#) for complete details.

Custom House will only collect, use and disclose your personal information with your knowledge and consent. Certain exceptions may apply. Please follow the link to our discussion of [Consent](#) for a full discussion of that policy and the exceptions that apply.

The collection of personal information shall be limited to that which is necessary for the purposes identified by Custom House. Information shall be collected by fair and lawful means. See our link to [Identifying Purposes](#) for a more detailed discussion of our Policy.

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained for at least five years after the information was last used and will be destroyed at a point in time that is required by law. If you want more information, follow the link to [Limiting Use, Disclosure and Retention](#).

### **Disclosure**

Custom House does not share, trade, sell or in any way disclose your personal information without your consent unless such a disclosure is required by law. For additional information on how Custom House discloses personal information, follow the link to [Limiting Use, Disclosure and Retention](#).

### **Your Choices**

Custom House strives to be as accurate, complete and up-to-date with your personal information as possible. You may request access to personal information in the custody or under the control of Custom House by contacting Custom House in writing and requesting access to your personal information. A small fee may be charged for providing you with copies of this information; however, you will be advised of any fees to be charged prior to Custom House proceeding with your request. You also have the right to challenge the accuracy and completeness of your personal information or have it amended as appropriate by requesting that your personal information be corrected. Finally, you have the right to challenge Custom House's handling of your personal information and can make a complaint directly to our Privacy Officers.

Custom House makes every effort to respond to requests and complaints fully, accurately and completely. If you are not satisfied with the response you receive to a request for access to or correction of your personal information or to a complaint regarding our handling of your personal information, you will be advised of any avenues of recourse that are available to you.

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### Other Important Information

Custom House protects your personal information with security safeguards that are recognized as 'Best Practices' in the financial sector. We use SSL 128 bit encryption for all data transfer over the Internet and a VPN of 128 bit, or higher, for data transfer within Custom House. Additional information on the measures adopted by Custom House to protect personal information is available Article 7 – [Safeguards](#).

### How to Reach Us

Custom House is responsible for personal information under its control. We have assigned our Chief Compliance Officer responsibility for our Privacy Policy. Read more about our [Articles of Accountability](#).

### To contact a Privacy Officer:

Write us:

#### Head Office:

Custom House Privacy Officer  
Att: Lori McColl  
Custom House Ltd.  
517 Fort Street,  
Victoria, B.C. V8W 1E7

Telephone : (250) 220 -1015 Ext. 239  
Fax : (250) 385-8699  
Email: [privacy@customhouse.com](mailto:privacy@customhouse.com)

#### Asia Pacific:

Custom House Privacy Officer  
Att: Jim Holburn  
Custom House Currency Exchange (Australia) Pty. Ltd  
Level 9, 53 Queen Street, Melbourne, Vic. Australia 3000

Telephone: +61 3 8622 8834  
Email: [jholburn@customhouse.com](mailto:jholburn@customhouse.com)

#### North America

Custom House Privacy Officer  
Att: Phil Tawtel  
Custom House Ltd & Custom House (USA) Ltd.  
517 Fort Street,  
Victoria, B.C. V8W 1E7

Telephone: (250) 220-1028  
Fax : (250) 220-7167  
Email: [ptawtel@customhouse.com](mailto:ptawtel@customhouse.com)

#### Europe & United Kingdom

Custom House Privacy Officer  
Att: Bryan Oliver  
Custom House Financial (UK) Ltd.  
2nd Floor,  
12 Appold Street,  
London, EC2A 2AW

Telephone: 0845 8824790  
Fax: 08458824791  
Email: [boliver@customhouse.com](mailto:boliver@customhouse.com)

### To contact the Chief Compliance Officer:

Write us:

**Bernard Beck**  
**Sr. VP & Chief Compliance Officer**  
**Head Office**  
**517 Fort Street**  
**Victoria, BC V8W 1E7**  
**Canada**

## **CUSTOM HOUSE PRIVACY POLICY**

### **Article 1 ○ Accountability**

1. Our Chief Compliance Officer must ensure that Custom House complies with all of our Privacy Articles. Other individuals within our organization may be responsible for the day-to-day collection and processing of personal information. In addition, other individuals within Custom House may be delegated to act on behalf of the Chief Compliance Officer.
2. Contact information for the Privacy Officer will be made, at or before, the time your personal information is collected.
3. Custom House is responsible for personal information in its custody or under its control, including information that has been transferred to a third party. Custom House will not disclose your personal information to a third party, or a foreign country, unless the recipient is subject to legislation, or a contract, that safeguards your personal information in a manner that is substantially similar to our Privacy Policy.
4. Custom House has implemented policies and practices to give effect to the Articles, including:
  - a) implementing procedures to protect personal information;
  - b) establishing procedures to receive and respond to complaints and inquiries;
  - c) training staff and communicating to staff information about our policies and practices; and
  - d) developing information to explain our policies and procedures.

## **Article 2 ○ Identifying Purposes**

1. Custom House will document and identify to you the purposes for which personal information is collected, used, disclosed and retained. Custom House will also ensure you understand that a hard copy of your personal information will be kept at your branch and that an electronic copy of your personal information will be kept at our Global Head Office at Custom House Ltd., 517 Fort Street, Victoria, British Columbia, V8W 1E7 CANADA.
2. Custom House will collect only that information necessary for the purposes that have been identified.
3. The identified purposes will be specified at or before the time of collection to you. Depending upon the way in which the information is collected, this can be done orally or in writing. An application form, for example, may explain the reason for the collection of your personal information.
4. When personal information that has been collected is to be used for a purpose not previously identified, the new purpose shall be identified prior to use. Unless the new purpose is required by law, your consent is required before information can be used for that purpose. For an elaboration on consent, see our Article 3 - [Consent](#).
5. Custom House is always willing to explain to you the purposes for which the information is being collected.
6. You may also wish to read Article 4 - [Limiting Collection](#) and Article 5 - [Limiting Use, Disclosure and Retention](#).

### Article 3 ○ Consent

1. Custom House requires your consent prior to, or at the time of, the collection of your personal information and the subsequent use and disclosure of this information. If Custom House wishes to use or disclose personal information it has collected from you for a purpose other than the purpose that was originally explained to you, Custom House will obtain a new consent from you unless your consent is not required by law. See [When would Custom House collect, use or disclose my personal information without my consent?](#)
2. The Article of consent requires both "knowledge" and "consent". Custom House will make a reasonable effort to ensure that the individual is advised of the purposes for which the information will be used or disclosed in a way that the individual can reasonably understand how the information will be used or disclosed. As well, your consent must be informed and given freely.
3. Custom House will not, as a condition of the supply of a product or service, require an individual to consent to the collection, use, or disclosure of information beyond that required to fulfill the explicitly specified and legitimate purposes.
4. The way in which Custom House seeks consent may vary, depending on the circumstances and the type of information collected. Custom House will require your expressed and explicit consent prior to the collection, use or disclosure of sensitive personal information. Sensitive personal information is information related to an individual's ethnic or racial origins, their medical or mental health history, their membership in trade union or political parties or their criminal history . Explicit consent can be given either orally or in a written form. Other situations recognize that an individual has implicitly consented to the collection, use or disclosure of personal information based on the nature of the transaction they are engaged in. A further discussion of this Article is included in [Types of Consent](#).
5. Custom House understands that there are some situations where the law recognizes the rights of an authorized representative. Authorized representatives can be appointed through following mechanisms:
  - where a power of attorney has been executed by the courts and explicitly references power over financial matters;
  - court granted guardianship order;
  - a parental or guardian in the case of a minor child where the child is unable to exercise their own information rights; or
  - an executor of an estate in the case of a deceased client.

In these cases, the right to consent to the collection, use and disclosure of personal information reverts from the individual to the authorized representative. The rights of access, correction and complaint are also exercised by the authorized representative. In short, the authorized representative can exercise any right or power conferred on an individual.

6. An individual may withdraw consent for the collection, use or disclosure of their personal information at any time. Subject to legal or contractual restrictions and reasonable notice the wishes of the individual will be respected and Custom House will act on the withdrawal of consent. Withdrawal of consent to the collection, use or disclosure of personal information may affect the types of services Custom House is able to provide to an individual. At the time the individual withdraws consent, the individual will be advised of the implications of the withdrawal of their consent.
7. Consent to the collection, use and disclosure of personal information will be obtained through fair and lawful means. Consent will not be obtained through deception.

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### Types of Consent

Custom House relies on individual consent for the collection, use and disclosure of personal information.

There are a number of ways in which an individual can consent to the collection, use and disclosure of their personal information.

Some information transactions are very straightforward and any consent associated with those transactions can be presumed to be implied. An example of a situation where implied consent would be recognized would be where a client leaves a name and telephone number with a Custom House staff member and requests a call back with information related to their account. In this situation, the individual has implied their consent to collect their personal information for the purpose of returning a phone call and that their personal information be used for the purpose of responding to their inquiry.

Other information transactions can involve the collection, use or disclosure of sensitive personal information. Sensitive personal information is:

- Racial or ethnic origin
- Religious beliefs
- Trade union membership
- Physical or mental health or condition
- The commission or alleged commission of the individual of an offence

When the collection, use or disclosure of sensitive personal information is required, for example for the purposes of applying for insurance on a financial service, Custom House cannot rely on implied consent. In those cases, Custom House will ask for your expressed or explicit consent. This consent can be given orally or in writing. Many of Custom House's explicit consent notices are found on applications forms or other formal documentation you exchange with your bank.

As always, if you have any questions regarding the collection, use or disclosure of your personal information with consent and Custom House's practices regarding the management of consent, contact our Privacy Officer.

## Custom House Ltd. - Global Privacy Policy

### When would Custom House collect, use or disclose my personal information without my consent?

1. Custom House may collect, use, or disclose certain personal information without your consent in the following circumstances;
2. If Custom House reasonably believes that the use or disclosure is necessary to lessen or prevent:
  - (a) a serious and imminent threat to someone's life, health or safety; or
  - (b) a serious threat to public health or public safety.
3. When Custom House has reason to suspect that unlawful activity has been, is being or may be engaged in, we may use or disclose your personal information as a necessary part of an investigation.
4. Where the collection, use or disclosure is required or authorised by law;
5. If Custom House reasonably believes that the use or disclosure is reasonably necessary for one or more of the following:
  - (a) the prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches of a prescribed law;
  - (b) the enforcement of laws relating to the confiscation of the proceeds of crime;
  - (c) the protection of the public revenue;
  - (d) the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct; or
  - (e) the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of the orders of a court or tribunal.
6. If Custom House uses or discloses your personal information without your consent, we will create a written report of the use or disclosure.

**Article 4 ○ Limiting Collection**

1. Custom House will not collect personal information indiscriminately. Both the amount and the type of information collected shall be limited to that which is necessary to fulfill the purposes identified to individuals in the notice given to them at the time or before information was collected.
2. Custom House will primarily collect personal information from you. Custom House will collect information about you from third parties when you have consented to the collection of information from a specific third party, for example where you have consented to Custom House obtaining a credit report from a recognized credit reporting agency, or where the indirect collection of personal information is authorized by law.
3. Custom House will make reasonable efforts to inform you if we have collected your personal information about you from someone else unless such notification is not required by law.

### Article 5 ○ Limiting Use, Disclosure, and Retention

1. Custom House will not use or disclose personal information for purposes other than those for which it was collected except with the consent of the individual or as required by law.
2. Custom House will evaluate the need to obtain explicit consent at the time a new use or disclosure of personal information is contemplated.
3. You may choose to opt out of the use or disclosure of your personal information by contacting Custom House. If you withdraw your consent for the use or disclosure of personal information, Custom House will advise you of any consequences the withdrawal of your consent will have on the level of service we are able to offer you.
4. Custom House will document if your personal information has been used or disclosed for a new purpose (i.e. a purpose which was not specified to you in the notification you received at the time the information was collected).
5. Custom House ensures that only those employees or third party contractors with operational duties related to the purposes identified at the time your personal information was collected will have access to that information.
6. Custom House will only use and disclose personal information to the extent that the use or disclosure of the personal information is reasonable for the intended purpose. Custom House will not use or disclose personal information that is excessive or not reasonably related to the intended information transaction.
7. Custom House may share your personal information with its affiliated entities located in Australia, Canada, Italy, New Zealand, the United Kingdom and the United States and external organisations for the provision of products and services to you. These organisations may include or be associated with foreign exchange related services (including international funds transfers), information technology services and records management. Only information about you pertinent to the supply of these products or services is provided and strict security and confidentiality requirements adhered to. In the instance where personal information is disclosed to an external organisation operating in a foreign country, Custom House will ensure that the information will be protected by a law or a contract which upholds privacy Articles. Further, we take our obligation to protect your information seriously and only deal with ethical suppliers and business partners who demonstrate similar beliefs.
8. Custom House will not use your government agency identifier as your account or reference number. Custom House will only use and disclose these numbers for the purposes required by law. You may however be asked to provide a government agency identifier when you deal with Custom House.
9. Custom House will retain personal information that has been used to make a decision about you long enough to allow you to access the information after the decision has been made.
10. Custom House will destroy, erase, or make anonymous your personal information when it is no longer required to fulfill the identified purpose(s). The minimum length of time Custom House will retain your personal information is five years after the last time that information was used to make a decision. Certain legislative or legal requirements may extend this period.
11. This Article is closely linked to the Article 3 - [Consent](#), Article 2 - [Identifying Purpose](#), and Article 9 - [Individual Access](#).

**Article 6 ○ Accuracy**

1. The extent to which personal information shall be accurate, complete, and up-to-date will depend upon the use of the information while taking into account the interests of the individual. Custom House will make reasonable efforts to ensure that your personal information is sufficiently accurate, complete, and up-to-date to minimize the possibility that inappropriate information may be used to make a decision about you.
2. Custom House will not routinely update your personal information, unless such a process is necessary to fulfill the purposes for which the information was collected and where consent was obtained.
3. Custom House will make reasonable efforts to ensure that any of your personal information that is used on an ongoing basis, including information that is disclosed to third parties, is accurate and up-to-date, unless limits to the requirement for accuracy are clearly set out.

### Article 7 ○ Safeguards

1. Custom House has security safeguards in place to protect your personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Custom House will protect your personal information regardless of the format in which it is held.
2. Custom House recognizes the sensitivity of the financial and credit information it may receive from an individual. The nature of the safeguards we use will vary depending on the sensitivity of the information that has been collected, the amount, distribution, and format of the information, and the method of storage. Custom House will safeguard more sensitive financial and credit information by a higher level of protection.
3. The methods of protection Custom House uses include;
  - a) physical measures, for example, locked filing cabinets and restricted access to offices;
  - b) organizational measures, for example, security clearances and limiting access on a "need-to-know" basis; and
  - c) technological measures, for example, passwords and SSL 128 bit encryption for all data transfer over the Internet and a Virtual Private Network of 128 bit or higher for data transfer within Custom House.
4. Custom House ensures that their employees are aware of the importance of maintaining the confidentiality of personal information.
5. Custom House will ensure that care is used in the disposal or destruction of personal information and has safeguards in place to prevent unauthorized parties from gaining access to the information.

## **Article 8 ○ Openness**

1. The information made available will include:
  - a) the name or title, and the address, of the person who is accountable for the privacy policies of Custom House, including information about how to contact this person. Follow the link to [How to Contact our Privacy Officers](#);
  - b) how you can gain access to personal information held by Custom House. Follow the link to [Access to or Correction of Personal Information](#);
  - c) a description of the type of personal information held by Custom House, including a general account of its use;
  - d) a copy of any brochures or other information that explain the privacy policies, standards, or codes of Custom House;
  - e) a description of any personal information that Custom House makes available to related organizations (e.g., subsidiaries); and
  - f) a general account of the types of Custom House employees that are granted access to your personal information for the purposes of performing their job responsibilities.
2. Custom House will make information on its policies and practices available in a variety of ways. Custom House provides information on privacy practices to individuals via its corporate website, through printed brochures available at branches and offices, and has established a telephone number through which individuals can speak with the Corporate Privacy Officers. In addition to these measures, Custom House will mail information on our Privacy Program to individuals on their request.

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### USA (GLBA) Specific Policy

In the United States, the Gramm-Leach-Bliley Act (“GLB”) prohibits financial entities from disclosing to a nonaffiliated third party any nonpublic, personal information about clients, unless financial entity has provided the client notice of the entity's privacy policies and the client has not directed that the information not be disclosed. The GLB directs the regulatory agencies to adopt rules to enforce the privacy law set forth in GLB. Pursuant to this mandate, the CFTC has adopted Regulation 160. Regulation 160 requires registrants to establish a written privacy policy pertaining to consumer financial information, provide the privacy notice to customers at the time the account is opened, and annually thereafter.

1. Custom House’s privacy practice is to advise individuals of the collection, use and disclosure of their personal information at the time the personal information is collected and to provide the individual with the ability to opt-out of the collection, use and disclosure of personal information. Custom House will also, in general terms, advise the individual that measures have been adopted to protect their personal information. Finally, at the time personal information is collected, individuals are advised of the ability to contact the Custom House Privacy Officer with additional questions related to the collection, use, disclosure retention or protection of their personal information.
2. Where an individual contacts Custom House and indicates they wish to opt-out of the collection, use and disclosure of their personal information, Custom House will advise the individual of the consequences of withdrawing consent. The withdrawal of consent for the collection, use or disclosure of personal information may limit the types of services Custom House can provide to an individual. For example, refusal to consent to the collection of information from a credit reporting agency may limit a financial institution’s ability to provide lending services.
3. Custom House currently notifies individuals of their privacy policies through a variety of mechanisms. These mechanisms include verbal notification if information is collected through a call center, in writing if the collection of information involves a formal application process and through the Corporate website. In addition to these mechanisms, Custom House will, at least annually, mail or email information on its corporate privacy structure to individuals residing in the United States. The information provided to individuals through this annual notification will include specific information related to the collection, use and disclosure of personal information and will describe, in general terms, the security safeguards which Custom House has adopted to protect their personal information. Individuals will also be provided with the contact information for the Custom House Privacy Officer in this communication should they have further questions.

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### UK/Italy Notification

1. Some of the jurisdictions in which Custom House conducts business require organizations to advise privacy regulatory bodies of the processing of personal information. This requirement facilitates creation of a publicly available registry which describes how organizations process (i.e. use and disclose) personal information.
2. In the event that Custom House triggers the requirement to report the processing (i.e. the collection, use or disclosure) of personal information to a privacy regulatory body in Italy or the United Kingdom, the Custom House Privacy Officer, along with regional compliance staff, will ensure that the relevant regulator is advised of:
  - The type of personal information
  - A general description of the processing of personal information which Custom House performs
  - The location of data processing

and will ensure that any fees related to notifications are paid.

3. Custom House will ensure that the privacy regulators in jurisdictions requiring notification are advised of any changes to data processing in those jurisdictions and that the requirement for annual notice is maintained.

**Article 9 ○ Individual Access To and Correction of Personal Information**

1. During routine business transactions, Custom House will release personal information such as account balances or decisions regarding services to clients and will make routine corrections of personal information such as change of address or phone number. These transactions take place outside of the formal process to request access to or correction of personal information.
2. In the event that an individual requests routine access to or correction of personal information and is refused, they have the right to request formal access to or correction of their personal information under the relevant privacy law which holds force and effect in their jurisdiction. Additional information on the process used to make such a request is available in the Access to Information Process
3. On request, Custom House will inform you whether or not we hold personal information about you. We will also tell you if we have provided your personal information to a third party under a business arrangement for Custom House. You have a right to request access to any personal information in Custom House's custody or control. In addition, Custom House will tell you how your personal information has been used and what information, if any, has been disclosed to a third party.
4. The Privacy Officer may require clarification of your request and will contact you to authenticate your identity and authority to make the specified request. If the Privacy Officer contacts you for clarification of your request and you do not respond within a reasonable period of time, your request may be declared to be abandoned and no further action by Custom House is required.
5. Custom House will make every effort to respond to your request fully, accurately and completely within 30 days. If Custom House requires more than 30 days to respond to your request for access to or correction of personal information, the Privacy Officer will contact to you explain the reasons for the delay, will contact the relevant privacy regulator if required and will advise you of your rights at that point.
6. The cost to you will be minimal. The requested information shall be provided or made available in a form that is generally understandable. For example, if we use abbreviations or codes to record information, an explanation of those abbreviations will be provided.
7. When an individual successfully demonstrates the inaccuracy or incompleteness of personal information, Custom House amend the information as required. Depending upon the nature of the information challenged, that amendment could involve the correction, deletion, or addition of information. Where appropriate, Custom House will transmit the amended information to third parties having access to the information in question.
8. In certain situations, Custom House may not be able to provide access to all your personal information. Exceptions to the access requirement will be limited and specific. The reasons for denying access will be provided to you upon request. Exceptions may include information:
  - a) the disclosure could reasonably be expected to threaten the safety or physical or mental health of an individual other than you;
  - b) the disclosure can reasonably be expected to cause immediate or grave harm to your safety;
  - c) the disclosure would reveal personal information about another individual;
  - d) the disclosure would reveal the identity of a third party does not consent to disclosure of his or her identity; or
  - e) if any other law prohibits the disclosure.
9. If information is withheld from you or your requested correction has been refused, Custom House will, in writing, identify the legislation which permits or requires us to withhold the information or refuse the correction and will identify for you any recourse which may exist. We will also provide you

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with contact information for an individual at Custom House who can respond to any questions you may have regarding our response to your request.

10. Any right to request access to or correction of person information granted to an individual can also be exercised by that individual's authorized representative. Additional information on the types of authorized representative recognized by Custom House is available under Article 3 – [Consent](#).
11. Where Custom House consults a credit report or a recommendation prepared by a credit reporting service, you will have a right to access and challenge that report or recommendation, or any decision based on the report and recommendation. On request, Custom House will provide you with the contact information of the credit reporting service should you wish to access or challenge that data.

## **Article 10 ○ Challenging Compliance**

1. The individual accountable for Custom House's compliance with privacy legislation is our Privacy Officers.
2. Custom House has procedures in place, to receive and respond to, complaints or inquiries about their policies and practices relating to the handling of personal information. For more information, see our [Complaint Resolution Process](#).
3. Custom House will inform individuals who make inquiries or lodge complaints of the existence of relevant complaint procedures. If the individual is not satisfied with the resolution of the complaint by Custom House, they will be advised of any existing rights to request review by the relevant regulatory body.
4. Custom House will investigate all complaints. If a complaint is found to be justified, Custom House will take appropriate measures, including, if necessary, amending its policies and practices.

### Custom House

#### Complaint Resolution Process for Personal Information

1. Custom House will accept complaints concerning our collection, use, disclosure, retention, safeguarding, access to or correction of personal information through several methods. See contact information at: [Contact Privacy Officers](#).
2. When Custom House receives your complaint, we will immediately forward it to our Privacy Officers.
3. Custom House has prepared a [Personal Information Complaint Form](#) for your use. The use of this Form is optional. You can mail this form to us, fax it, or attach it to an email. Click here to obtain the [Personal Information Complaint Form](#).
4. When the complaint is received by the Privacy Officers, the date the complaint was received will be recorded. Custom House will acknowledge receipt of your complaint. Custom House will respond to complaints as soon as possible. If Custom House requires more than 30 days to respond to your complaint, the Privacy Officer will contact to you explain the reasons for the delay and advise you of a date on which you can expect to be notified of the results of our investigation.
5. Custom House may contact you to clarify your complaint.
6. Custom House will investigate all complaints.
7. Your complaint will be reviewed through a fair, impartial and confidential process. Only in extenuating circumstances will we assign your complaint to an individual who is the subject of your complaint. Your complaint will be investigated in accordance with relevant legislation and legal Articles, codes of conduct, concepts of fairness and natural justice and by following the private sector code of 'Best Practices'.
8. If your complaint is justified, Custom House will take appropriate measures to rectify the situation, including correcting information, handling practices, and policies where necessary. Resulting changes will be communicated to our relevant employees.
9. Custom House will notify you of the outcome of our investigation in a clear way and will inform you of the steps we have taken to prevent a recurrence.
10. Should you remain dissatisfied with the results of Custom House's investigation, you may have the right to appeal our finding to a privacy regulatory body or through another mechanism. These appeal rights vary in each of the jurisdictions in which Custom House does business. When you are advised of Custom House's findings with respect to your complaint, you will also be advised of any relevant appeal mechanisms which are available to you. You will also be provided with contact information for a Custom House staff member who can respond to your questions regarding the investigation.

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**Custom House**

Custom House  
Personal Information Complaint Form

Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City: \_\_\_\_\_ Province or State: \_\_\_\_\_

Country: \_\_\_\_\_

Contact Phone Number: \_\_\_\_\_  (home)  (work)  (cell)

Fax Number: \_\_\_\_\_

Email Address: \_\_\_\_\_  
*(provide only if you prefer to receive communications by email)*

1. Are you making this complaint on behalf of yourself?  Yes  No

2. Are you making this complaint on behalf of someone else?  Yes  No  
*(attach documents supporting you authority for this)*

3. Please summarize your complaint.  
*(if known, please indicate the location, numbers or reference dates, including the name of the date of the complaint and the names of any employees you have dealt with)*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. Are you, or were you, an employee of Custom House?  Yes  No

6. Have you made a complaint to Custom House via another method?  Yes  No

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Please attach copies of any correspondence with Custom House.

## Custom House Ltd. - Global Privacy Policy

- Please attach any documentation that authorizes you to act for another individual *(if you answered "Yes" to that question)*.

Please send this form and supporting documentation to:

### Head Office:

Custom House Privacy Officer  
Att: Lori McColl  
Custom House Ltd.  
517 Fort Street  
Victoria, B.C. V8W 1E7

Telephone : (250) 220 -1015 Ext. 239  
Fax : (250) 385-8699  
Email: [privacy@customhouse.com](mailto:privacy@customhouse.com)

### Asia Pacific:

Custom House Privacy Officer  
Att: Jim Holburn  
Custom House Currency Exchange (Australia) Pty. Ltd  
Level 9, 53 Queen Street, Melbourne, Vic. Australia 3000

Telephone: +61 3 8622 8834  
Email: [jholburn@customhouse.com](mailto:jholburn@customhouse.com)

### North America

Custom House Privacy Officer  
Att: Phil Tawtel  
Custom House Ltd & Custom House (USA) Ltd.  
517 Fort Street,  
Victoria, B.C. V8W 1E7

Telephone: (250) 220-1028  
Fax : (250) 220-7167  
Email: [ptawtel@customhouse.com](mailto:ptawtel@customhouse.com)

### Europe & United Kingdom

Custom House Privacy Officer  
Att: Bryan Oliver  
Custom House Financial (UK) Ltd.  
2nd Floor,  
12 Appold Street,  
London, EC2A 2AW

Telephone: 0845 8824790  
Fax: 08458824791  
Email: [boliver@customhouse.com](mailto:boliver@customhouse.com)

If you require assistance in completing this form, or wish to discuss your complaint in more detail, please contact our Privacy Officer at the telephone number stated above.

### Request for Access To or Correction of Personal Information Process

1. During the routine conduct of business, Custom House will release personal information such as account balances or decisions regarding services to clients and will make routine corrections of personal information such as change of address or phone number outside of the formal process to request access to or correction of personal information.
2. In the event that an individual requests routine access to or correction of personal information and is refused, they have the right to request formal access to or correction of their personal information under the relevant privacy law which holds force and effect in their jurisdiction. This process is intended to cover the processing of those formal requests under privacy law.
3. Custom House will accept written requests for access to or correction of personal information via mail fax or e-mail. However it may be necessary to validate the authenticity of the instruction before any changes are made or the information released. Custom House has prepared forms for your use; however, the use of this form is optional. You can initiate a form request for access to or correction of your personal information by writing to our Privacy Officer; however, you should make specific reference in your correspondence to the formal nature of your request and should provide enough detail to allow the Privacy Officer to begin to process your request.
4. When Custom House receives your request, it will be immediately forwarded to our Privacy Officer as there are specific timelines associated with processing requests such as these. The Privacy Officer may require clarification of your request and will contact you. If the Privacy Officer contacts you for clarification of your request and you do not respond within a reasonable period of time, your request may be declared to be abandoned and no further action by Custom House is required.
5. When the request is received by the Privacy Officer and sufficient information has been collected to allow the Privacy Officer to begin to process your request, the date the complaint was received by Custom House will be recorded and Custom House will acknowledge receipt of your request to you in writing.
6. Custom House may charge reasonable fees for responding to a request for access to personal information. If fees will be applicable in your case, you will be advised of the estimated total of fees when the Privacy Officer acknowledges your request. You will be required to agree to pay the estimated fees prior to processing your request. Custom House may agree to waive fees where the individual can demonstrate that requiring the individual to pay a fee is financially burdensome or where the waiver of fees would otherwise be considered reasonable and fair.
7. Custom House will make every effort to respond to your request for access to or correction of personal information in 30 days. If Custom House requires more than 30 days to respond to your complaint, the Privacy Officer will contact you to explain the reasons for the delay, will contact the relevant privacy regulator if required and will advise you of your rights at that point. The maximum fees which Custom House will charge for providing access to personal information are laid out in a fee schedule. Custom House will not charge fees for processing requests to correct personal information.
8. Custom House will respond to all requests for access or correction fully, accurately and completely. This includes explaining any terms, codes or abbreviations used in your personal information.
9. Your request for access to or correction of personal information will be processed through a fair, impartial and confidential process.
10. When your request for access to personal information has been processed, you will be advised of our response in writing. We will release the information to you unless we are permitted by law to refuse to grant you access to the requested information. If access to information is refused in whole or in part, you will be advised of the relevant legislation which permits us to refuse to release the information to you, the name and contact information of a Custom House employee who can respond to any questions you may

## Custom House Ltd. - Global Privacy Policy

have regarding the processing of your request and will be advised of any rights of recourse you may have.

11. When your request for correction of personal information has been processed, you will be advised in writing of our decision related to your request. If we agree to correct your personal information, we will forward the corrected information to any third parties to whom we provided the original information. If we refuse to correct your personal information, you will be advised of the legislative authority in which we based our decision, the name and contact information of a Custom House employee who can respond to questions regarding our decision and any rights of recourse you may have. These rights of recourse are jurisdictionally specific any may include the right to request that a statement of disagreement be attached to the original record or to request that our decision to refuse to correct information be reviewed by a privacy regulator.

## Custom House Ltd. - Global Privacy Policy

### Sample Wording for Response Letters

*Suggested wording for response to access request where individual is to be advised of right to recourse:*

*On <insert date> you requested that Custom House provide you with access to the following information.*

*<insert text of letter requesting correction>*

*Your request for access to personal information has been reviewed and refused by Custom House.*

*Section <insert legislative citation> of the <insert statute name> permits organizations to refuse to provide access to personal information in the following circumstances:*

*<insert legislative excerpt>*

*We have determined that section <insert section> applies in this case.*

*As we have refused your request for access to personal information, you retain the right to request that our decision be reviewed by <insert name of regulatory body>. To initiate this process, please write to the <insert regulator's name and address> and include a copy of this letter along with a copy of your initial request.*

*If you have any questions on this correspondence, please write to me or call me at <insert telephone number>.*

*Suggested wording for response to request for correction where disparate review rights exist and the requested correction has been refused.*

#### **Refusal where right of review exists**

*On <insert date> you requested that Custom House make the following correction of your personal information.*

*<insert text of letter requesting correction>*

*Your request for correction of personal information has been reviewed and refused by Custom House.*

*Section <insert legislative citation> of the <insert statute name> permits organizations to refuse to correct personal information in the following circumstances:*

*<insert legislative excerpt>*

*We have determined that section <insert section> applies in your case.*

*As we have refused your request for correction or amendment of personal information, you retain the right to request that our decision to refuse to correct or amend your personal information be reviewed by <insert name of regulatory body>. To initiate this process, please write to the <insert regulator's name and address> and include a copy of this letter along with a copy of your initial request.*

*If you have any questions on this correspondence, please write to me or call me at <insert telephone number>.*

## Custom House Ltd. - Global Privacy Policy

### **Refusal where right to attach a statement of disagreement exists**

On <insert date> you requested that Custom House make the following correction of your personal information.

<insert text of letter requesting correction>

Your request for correction of personal information has been reviewed and refused by Custom House.

Section <insert legislative citation> of the <insert statute name> permits organizations to refuse to correct personal information in the following circumstances:

<insert legislative excerpt>

We have determined that section <insert section> applies in your case.

As we have refused your request for correction or amendment of personal information, you retain the right to attach a statement of disagreement to your record. Should you wish to pursue this, please forward a statement of disagreement of not more than 500 words to <insert Privacy Officer's name and address>. Your statement of disagreement should lay out the correction you requested along with your reasons for disagreeing with our decision to refuse to correct your information.

If you have any questions on this correspondence, please write to me or call me at <insert telephone number>.

### Contact Information for Regulators

Jurisdiction	Review Rights				Contact
	Review of access decision	Correction – review of refusal	Correction – right to attach statement	Correction – choice between review or statement	
British Columbia	Yes	Yes	No	No	Office of the Information and Privacy Commissioner for British Columbia PO Box 9038, Stn. Prov. Govt. Victoria, B.C. V8W 9A4  Telephone: (250) 387-5629 Toll Free: Vancouver: (604) 660-2421 Elsewhere in BC: (800) 663-7867 Fax: (250) 387-1696
Alberta	Yes	Yes	No	No	The Office of the Information and Privacy Commissioner Suite 500, 640-5th Avenue SW Calgary, AB T2P 3G4  Telephone: (403) 297-2728 Toll Free: 310-0000
Quebec	Yes	Yes	No	No	La Commission d'accès à l'information du Québec

## Custom House Ltd. - Global Privacy Policy

					<p>Head Office 575, rue Saint-Amable Bureau 1.10 Québec (Québec) G1R 2G4</p> <p>Telephone: (418) 528-7741 Fax: (418) 529-3102 Toll Free: 1 888 528-7741</p>
Canada	Yes	Yes	No	No	<p>Privacy Commissioner of Canada 112 Kent Street Place de Ville Tower B, 3rd Floor Ottawa, Ontario K1A 1H3</p> <p>Toll-free: 1-800-282-1376</p>
United States	Yes	Yes	No	No	<p>Commodity Futures Trading Commission Headquarters Office Three Lafayette Centre 1155 21<sup>st</sup> Street, NW Washington DC 20581</p> <p>Telephone: (202) 418-5000 Fax: (202) 418-5521</p>
United Kingdom	Yes	Yes	No	No	<p>The Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF</p> <p>Telephone: 01625 545745 - main helpline 01625 545740 - notification helpline 01625 545700 - switchboard operator Fax: 01625 524510</p>
Italy	Yes	Yes	No	No	<p>Garante Per La Protezione Dei Dati Personal Piazza di Monte Citorio n. 121 00186 ROMA</p> <p><i>E-mail:</i> <a href="mailto:garante@garanteprivacy.it">garante@garanteprivacy.it</a> Fax: (+39) 06.69677.785 Centralino telefonico: (+39) 06.69677.1</p>
New Zealand	Yes	Yes	No	No	<p>Privacy Commissioner of New Zealand Auckland Office PO Box 466, Auckland</p> <p>Telephone 09-302 8680 Facsimile 09-302 2305</p> <p>Privacy Commissioner of New Zealand Wellington Office PO Box 10-094, Wellington</p> <p>Telephone 04-474 7590 Facsimile 04-474 7595</p>

## Custom House Ltd. - Global Privacy Policy

Australia	Yes	Yes	Yes	No	Office of the Privacy Commissioner of Australia GPO Box 5218 Sydney NSW 2001  Telephone - 1300 363 992
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## Custom House Ltd. - Global Privacy Policy

### Fee Schedule (Within the UK the fee schedule will not apply)

The amount of the fees set out in this Schedule are the maximum amounts that will be charged to applicants.

The UK will charge no more than £10 per client request.

For searching for, locating and retrieving a record	\$6.75 per 1/4 hr.
For producing a record from an electronic record	
(a) Computer processing and related charges	Actual cost to Custom House
(b) Computer programming	Actual cost to Custom House up to \$20.00 per 1/4 hr.
For producing a paper copy of a record:	
(a) photocopies and computer printouts:	
(i) black and white up to 8 1/2" x 14"	\$0.25 per page
(ii) other formats	\$0.50 per page
(b) from microfiche or microfilm	\$0.50 per page
(c) plans and blueprints	Actual cost to Custom House
For producing a copy of a record by duplication of the following media:	
(a) microfiche and microfilm	Actual cost to Custom House
(b) computer disks	\$5.00 per disk
(c) computer tapes	Actual cost to Custom House
(d) slides	\$2.00 per slide
(e) audio and video tapes	Actual cost to Custom House
For producing a photographic copy (colour or black and white) printed on photographic paper from a negative, slide or digital image	
(a) 4" x 6"	\$3.00
(b) 5" x 7"	\$6.00
(c) 8" x 10"	\$10.00
(d) 11" x 14"	\$20.00
(e) 16" x 20"	\$30.00
For producing a copy of a record by any process or in any medium or format not listed in sections 3 to 5 above	Actual cost to public body
For preparing and handling a record for release	
	\$6.75 per 1/4 hr.
For supervising the examination of a record	
	\$6.75 per 1/4 hr.
For shipping a record or a copy of a record	Actual cost to Custom House

**Custom House Ltd. - Global Privacy Policy**

**Custom House**

Custom House  
Request to Access Personal Information Form

Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City: \_\_\_\_\_ Province or State: \_\_\_\_\_

Country: \_\_\_\_\_

Contact Phone Number: \_\_\_\_\_  (home)  (work)  (cell)

Fax Number: \_\_\_\_\_

Email Address: \_\_\_\_\_  
*(provide only if you prefer to receive communications by email)*

- 1. Are you requesting access to your own personal information?  Yes  No
- 2. Are you making this request on behalf of someone else?  Yes  No

If so, what is the name of the individual on behalf of whom you are requesting access to information and what is your authority to make this request on their behalf?  
*(Please attach documents supporting as Custom House is required to validate your authority to act on this individual's behalf prior to processing your request)*

- 
- 3. Please describe the personal information you wish to access.  
*(If known please indicate file numbers, reference dates or the names of any employees you have dealt with. If necessary, please attach additional details or any correspondence related to your request for access to information with this form.)*

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\_\_\_\_\_  
Signature:

\_\_\_\_\_  
Date:

Please send this form and supporting documentation to:

## Custom House Ltd. - Global Privacy Policy

### Head Office:

Custom House Privacy Officer  
Att: Lori McColl  
Custom House Ltd.  
517 Fort Street,  
Victoria, B.C. V8W 1E7

Telephone : (250) 220 -1015 Ext. 239  
Fax : (250) 385-8699  
Email: [privacy@customhouse.com](mailto:privacy@customhouse.com)

### Asia Pacific:

Custom House Privacy Officer  
Att: Jim Holburn  
Custom House Currency Exchange (Australia) Pty. Ltd  
Level 9, 53 Queen Street, Melbourne, Vic. Australia 3000

Telephone: +61 3 8622 8834  
Email: [jholburn@customhouse.com](mailto:jholburn@customhouse.com)

### North America

Custom House Privacy Officer  
Att: Phil Tawtel  
Custom House Ltd & Custom House (USA) Ltd.  
517 Fort Street,  
Victoria, B.C. V8W 1E7

Telephone: (250) 220-1028  
Fax : (250) 220-7167  
Email: [ptawtel@customhouse.com](mailto:ptawtel@customhouse.com)

### Europe & United Kingdom

Custom House Privacy Officer  
Att: Bryan Oliver  
Custom House Financial (UK) Ltd.  
2nd Floor,  
12 Appold Street,  
London, EC2A 2AW

Telephone: 0845 8824790  
Fax: 08458824791  
Email: [boliver@customhouse.com](mailto:boliver@customhouse.com)

If you require assistance in completing this form, or wish to discuss your request for access to personal information in more detail, please contact our Privacy Officer by telephone at the telephone number stated above.

**Custom House Ltd. - Global Privacy Policy**

**Custom House**

Custom House  
Request to Correct Personal Information Form

Name: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

City: \_\_\_\_\_ Province or State: \_\_\_\_\_

Country: \_\_\_\_\_

Contact Phone Number: \_\_\_\_\_  (home)  (work)  (cell)

Fax Number: \_\_\_\_\_

Email Address: \_\_\_\_\_  
*(provide only if you prefer to receive communications by email)*

- 1. Are you requesting correction of your own personal information?  Yes  No
- 2. Are you making this request on behalf of someone else?  Yes  No

If so, what is the name of the individual on behalf of whom you are requesting correction of personal information and what is your authority to make this request on their behalf?  
*(Please attach documents supporting as Custom House is required to validate your authority to act on this individual's behalf prior to processing your request)*

---

- 3. Please describe the personal information you wish to have corrected.  
*(If known please indicate file numbers, reference dates or the names of any employees you have dealt with. Please attach additional details or any correspondence or supporting documentation related to your request for correction of personal information with this form.)*

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
Signature:

\_\_\_\_\_  
Date:

Please send this form and supporting documentation to:

## Custom House Ltd. - Global Privacy Policy

### Head Office:

Custom House Privacy Officer  
Att: Lori McColl  
Custom House Ltd.  
517 Fort Street,  
Victoria, B.C. V8W 1E7

Telephone : (250) 220 -1015 Ext. 239  
Fax : (250) 412-0581  
Email: [privacy@customhouse.com](mailto:privacy@customhouse.com)

### Asia Pacific:

Custom House Privacy Officer  
Att: Jim Holburn  
Custom House Currency Exchange (Australia) Pty. Ltd  
Level 9, 53 Queen Street, Melbourne, Vic. Australia 3000

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Email: [boliver@customhouse.com](mailto:boliver@customhouse.com)

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