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# Privacy Policy

Last Revised: July 2006

## GENERAL

Honda Canada Finance Inc. (“we, us, our”) is wholly owned by Honda Motor Co. Ltd. Our parent company is American Honda Finance Corporation and we are affiliated with Honda Canada Inc. We provide customers with retail and lease financing of Honda and Acura vehicles, retail and wholesale financing of Honda Motorcycles, All Terrain Vehicles and Power Equipment, through authorized dealers across Canada.

Our executive office is located at:

3650 Victoria Park Avenue, Suite 400, North York, Ontario M2H 3P7 TEL. (416) 754-2323 FAX (416) 754-2327

We are committed to protecting the privacy of the Personal Information of our customers, dealer personnel and other individuals by complying with Canadian privacy laws and regulations.

This privacy policy (the “Policy”) is current as of the “Last revised” date set out at the top of this Policy. We will continue to review this Policy to ensure that it is relevant and remains current with changing laws, regulations and technologies.

In this Policy, “Personal Information” means any identifiable information about you. Personal Information will include name, address, date of birth, employment history and credit and financial information.

## PURPOSE

We recognize that effective systems, procedures and measures are important to protect and safeguard your Personal Information that you share with us.

The purpose of this Policy is to help you understand the procedures that we have implemented regarding the collection, storage, use, disclosure, protection and accuracy of your Personal Information that we collect and control. This Policy balances your right to privacy, with our need to collect, use and/or disclose the information for legitimate business purposes.

### Principle 1 – Accountability

We are responsible for protecting your Personal Information under our control, including any Personal Information of yours that we disclose to our subsidiaries, affiliates, agents, contractors and dealers for contract management, administration and other reasonable business purposes.

- 1) Our Privacy Officer has been designated to oversee compliance with this Policy. We may delegate other individuals to act on our behalf or to perform certain functions of our Privacy Officer or to take responsibility for managing the day-to-day collection and processing of your Personal Information.
- 2) We use appropriate contractual agreements or other means to provide a comparable level of protection with third parties who process your Personal Information.
- 3) We have implemented policies and practices to give effect to this Policy, including:
  - a) procedures that govern the collection, storage, use, disclosure, protection and accuracy of your Personal Information;

- b) procedures that analyze new initiatives that may affect your Personal Information;
  - c) procedures to receive and respond to inquiries and complaints;
  - d) training and communicating information to employees about our policies and practices; and
  - e) publishing materials to explain our Policy, procedures and practices.
- 4) Our Executive Management is accountable and responsible for compliance with this Policy.

## **Principle 2 – Identifying Purposes for which Personal Information Is Collected**

We identify the purposes for which we collect, use and disclose your Personal Information at or before the time of collection from you, and will collect only information necessary for the identified purposes.

- 1) We collect your Personal Information from you for the following purposes:
- a) to evaluate your credit application and your eligibility for credit;
  - b) to enable us and our affiliates to enter into contractual relationships with you;
  - c) for contract management and administration such as credit, billing, collection, service, lien registration and insurance tracking;
  - d) for vehicle service and product warranties;
  - e) for marketing and promotion of products, goods and services to you;
  - f) for other reasonable business purposes which we believe may be of interest to you; and
  - g) to meet legal and regulatory requirements.
- 2) We will specify to you orally, electronically or in writing the identified purposes at or before the time we collect your Personal Information. On request, persons collecting your Personal Information from you on our behalf shall explain the identified purposes or refer you to an employee of ours to explain the purposes.
- 3) As required by law, we will identify to you any new purposes for using or disclosing your Personal Information prior to such use or disclosure.
- 4) When we obtain a credit bureau report on you or update a credit-reporting agency with your payment history, your Social Insurance Number is the best way to make sure that the information actually refers to you. Incorrect information can lead to making false conclusions about you. You should be aware that using a Social Insurance Number this way is voluntary. If you choose not to give us your Social Insurance Number, this by itself will not prevent you from obtaining credit or other service from us.

## **Principle 3 – Consent**

We make reasonable efforts to ensure that you understand how we use and disclose your Personal Information. We obtain your consent for the collection, use, or disclosure of your Personal Information, except in circumstances where permitted or required by law.

- 1) We provide you with information about the way in which we use your Personal Information, through printed materials, the Honda Canada Inc. website and other electronic means.
- 2) We obtain your consent for the collection, use or disclosure of your Personal Information, primarily in the form of a credit application or other form of consent. We may seek your consent in other ways, such as electronic enrollment forms, survey forms, facsimile, electronic mail and telephone conversations with our employees or agents. The form of consent, including whether it is express or implied, or oral or written, may vary depending upon the circumstances and the type of information, including the sensitivity of the information and your reasonable expectations.
- 3) We also obtain consent from your legal guardian or person having power of attorney for you in situations where we become aware that you (i) have died (ii) are a minor (iii) have become seriously ill or (iv) are mentally incapacitated.

- 4) We do not, as a condition to the supply of a product or service, require your consent for the collection, use, or disclosure of your Personal Information beyond that required in fulfilling the identified purposes.
- 5) Generally, we will seek your consent for the use and/or disclosure of your Personal Information at the time of its collection. In certain circumstances, we may seek your consent after we collect your Personal Information, but before we use or disclose it, for example, when we want to use your Personal Information for a purpose not previously identified to you.
- 6) You may opt out of receiving marketing or promotional communications for products and services from us at the time of completing the consent form or subsequently by contacting any one of our Branch offices.
- 7) You may withdraw your Consent for any other identified purposes at any time, subject to legal and/or contractual restrictions and reasonable notice. You may contact any one of our Branch offices for more information regarding the implications of such withdrawal. We may not be able to provide you with a particular product or service if you withdraw your consent to certain uses of information.

#### **Principle 4 – Limiting collection**

We will limit the collection of your Personal Information to that which is necessary to fulfill the purposes we identify. We will collect such information by fair and lawful means.

- 1) We collect your Personal Information primarily from you.
- 2) We may also collect your Personal Information from other sources including our subsidiaries, affiliates, agents, contractors and authorized dealers, credit/consumer reporting agencies, financial institutions, credit grantors, landlords, employers or personal references, or other third parties who represent that they have the right to disclose the information.

#### **Principle 5 – Limiting use, disclosure, and retention**

We do not use or disclose your Personal Information for purposes other than those for which it is collected, except with your consent or as required or permitted by law.

- 1) We will not sell any of your Personal Information that you provide us.
- 2) Subject to applicable legislation, we may disclose your Personal Information as follows:
  - a) to our subsidiaries, affiliates and authorized dealers for contract management and administration, product warranty and vehicle service and/or marketing of their products and services;
  - b) to credit/consumer reporting agencies, and/or financial institutions to exchange details of any credit granted to you, including without limitation, your account balance and payment history; for the purposes of evaluating your eligibility for credit and determining credit worthiness and for the purposes of permitting other credit grantors to do the same;
  - c) to agents, contractors, or individuals employed by or under contract with us to perform reasonable business functions on our behalf, such as but not limited to contract management and administration;
  - d) to a public authority or agent of a public authority, if in our reasonable judgment, it appears that there is imminent danger to life or property which could be avoided or minimized by disclosure of the information;
  - e) to a third party or parties if the Conditional Sales Agreement or Lease Agreement that you enter into with us is transferred or assigned to such third party, for the purposes described in this Policy;
  - f) to an organization in connection with the due diligence for, and completion of, a business transaction, including, without limitation, a securitization or financing involving us or our subsidiaries or affiliates; and
  - g) to a third party or parties, where you consent to such disclosure, or disclosure is required or permitted by law.

In some cases Personal Information may be disclosed, processed and stored outside Canada, and therefore may be available to government authorities under lawful orders made there.

- 3) Access to your Personal Information is only given to our employees who need to know the information and whose duties reasonably so require the information in order to fulfill the identified purposes.
- 4) We retain your Personal Information only as long as necessary or relevant for the identified purposes; as required by law; where we use your Personal Information to make a decision about you, long enough to allow you access to the information for a reasonable period of time after the decision has been made; and where your Personal Information is the subject of a request from you, for as long as is necessary to allow you to exhaust any recourse you may have under the law.

## **Principle 6 – Accuracy**

We keep your Personal Information as accurate, complete, and up-to-date as is necessary for the identified purposes so as to minimize the possibility of using incorrect information about you.

- 1) We update your Personal Information as it is made available to us by you or by a subsidiary, affiliate, agent, contractor or authorized dealer of ours, and only if the information is necessary to fulfill the identified purposes.
- 2) You or your agents are responsible for informing us about changes to your Personal Information that are necessary to fulfill the identified purposes, such as but not limited to: if your name or address changes, if you die, if you change employer, if a proceeding in bankruptcy, receivership, or insolvency is started by you or against you, if you fail to comply with insurance requirements under a Conditional Sales Agreement or Lease Agreement with us, if your driver's permit is cancelled or under suspension, if you are on our Pre-Authorized Debit Plan and you change your bank account information.
- 3) We will not routinely update your Personal Information unless such a process is necessary to fulfill the purposes for which we collect the information.
- 4) Whenever possible, we will correct information given to an outside organization. If a third party, such as a credit reporting agency, has given us information which you tell us is incorrect, we will give you the name and address of that party, so that you can correct the information.

## **Principle 7 – Safeguards**

We protect your Personal Information with security safeguards appropriate to the sensitivity of the Personal Information.

- 1) We protect your Personal Information (regardless of the format in which it is held) against loss or theft, unauthorized access, disclosure, copying, use, or modification, through appropriate safeguards.
- 2) The methods of protection we use to protect your Personal Information include:
  - a) physical measures, for example, locked filing cabinets and restricted access to offices;
  - b) organizational measures, for example, staff training, security clearances and limiting access on a need-to-know basis; and
  - c) technological measures, for example, the use of passwords, encryption, firewalls, anonymizing software.
- 3) We protect your Personal Information that we disclose to:

- a) our subsidiaries and affiliates, by ensuring that such subsidiaries and affiliates have in place privacy policies regarding the use and disclosure of your Personal Information which are substantially similar to this Policy; and
  - b) our agents, contractors and authorized dealers, by contractual agreements stipulating the confidentiality of the Personal Information and the purposes for which they may use and/or disclose your Personal Information.
- 4) We ensure that our employees are aware of the importance of maintaining security and confidentiality of your Personal Information.
  - 5) We dispose and destroy your Personal Information with care, in order to prevent unauthorized parties from gaining access to the information.

## Principle 8 – Openness Regarding our Privacy Policies and Practices

We make specific information available to you about this Policy and other policies and practices relating to the management of your Personal Information.

- 1) The following information is made available to you:
  - a) information that explains our privacy policies, standards, and/or codes;
  - b) the name and addresses of the Branch holding your Personal Information;
  - c) the name and address of our Privacy Officer;
  - d) the means of gaining access to Personal Information held on you by our Branch;
  - e) a description of the type of Personal Information held on you by our Branch, including a general account of its use;
  - f) the identity of our subsidiaries, affiliates, agents, contractors and authorized dealers, to whom we have disclosed your Personal Information and the purposes for which these third parties use the information.
- 2) We provide you with information about our privacy policies and practices through written materials, the Honda Canada Inc. website and other electronic means and through our Customer Service Centres at each of our Branch locations.

## Principle 9 – Access to Personal Information

Upon written request, we will give you access to your Personal Information held by us and an account of the use and disclosure. You may challenge, in writing, the accuracy and completeness of your Personal Information held by us and ask us to amend the information as appropriate. Where you inform us that you require assistance in making such written request, we will provide you with assistance. We may require you to provide sufficient information to permit us to respond to your request, but we will only use and disclose such information for this purpose. We will supply the information in a form that is generally understandable.

- 1) You can inquire and request access to your Personal Information held by us, by completing and sending a Personal Information Request to the Branch holding your Personal Information. When you make a request in respect of your Personal Information holdings, you should be as specific as possible with respect to the information that is the subject of your request.

**Ontario/Atlantic Branch:** 3650 Victoria Park Avenue, Suite 400, North York, Ontario M2H 3P7 TEL. (416) 754-2323 FAX (416) 754-2327

**Western Branch :** 13711 International Place, Suite 110, Richmond, BC V6V 2Z8 TEL. (604) 278-1200 FAX (604) 278-6627

**Quebec Branch:** 1750 rue Eiffel, Boucherville, Quebec J4B 7W1 TEL. (450) 641-9062 FAX (450) 449-5704

- 2) We will respond to your request for Personal Information not later than **thirty (30) days** (the “Notice Period”) after receipt of a written request. We may extend the Notice Period another thirty (30) days when:
  - a) responding within the Notice Period would unreasonably interfere with our activities;

- b) the time we require to undertake any consultations necessary to respond to the request would make the Notice Period impractical to meet; or
  - c) we require additional time in order to convert the Personal Information into an alternative format at your request; then we shall within the Notice Period send you a notice, advising you of the new Notice Period, the reasons for extending the Notice Period and your right to make a complaint to the Privacy Commissioner in respect of the extension.
- 3) We will respond to each such request:
- a) at no cost to you for access; or
  - b) at a minimal cost to you for access where we provide you with an estimate of the approximate cost within the Notice Period. Upon receipt of the estimate, you must advise us within the Notice Period, if you wish to continue with the request. Where you do not advise us within the Notice Period that you wish to continue with the request, then we will deem the request withdrawn.
- 4) In our response to your request for your Personal Information we shall inform you whether or not we hold Personal Information about you and where reasonably possible:
- a) shall state the source of the information;
  - b) shall provide you an account of the use that we have made or is being made of your Personal Information; and
  - c) shall provide a list of organizations to which we have, or may have, disclosed your Personal Information.
- 5) If you successfully demonstrate the inaccuracy or incompleteness of your Personal Information, we will amend the information as required. Where appropriate, we will transmit the amended information to third parties having access to the information in question. If we do not resolve a challenge that you make, we will record the substance of the unresolved challenge. When appropriate, we will transmit the existence of the unresolved challenge to third parties having access to the information in question.
- 6) Under certain conditions as permitted or required by law, we will not provide you with access to your Personal Information kept in our file. Where we refuse your request, we will within the Notice Period identify (i) the reasons for refusing the request, and (ii) the recourse available to you under applicable privacy laws.

## **Principle 10 – Challenging Compliance**

We have procedures in place to receive and respond to your challenges or complaints about the handling of your Personal Information or this Policy and our practices relating to this Policy.

- 1) If you have further inquiries regarding your Personal Information held by us or if you wish to address a challenge regarding our compliance with this Policy, you may contact our Privacy Officer in writing at the address listed below:

**David Sudbury, Privacy Officer,**  
Honda Canada Finance Inc.,  
3650 Victoria Park Avenue, Suite 400,  
North York, Ontario  
M2H 3P7

- 2) If you make an inquiry or lodge a complaint we will inform you of the existence of relevant complaint procedures and we will investigate all written complaints. If we find a complaint to be justified, we will take all appropriate measures, including, if necessary, amending our policies and practices.