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# Privacy Policy Updated: December 2010

## WHO WE ARE

Honda Canada Finance Inc., o/a Honda Financial Services (“we, us, our”) is a Canadian Federal company. Our parent company is American Honda Finance Corporation and we support Honda Canada Inc. in providing customers with retail and lease financing of Honda and Acura vehicles, Motorcycles, All Terrain Vehicles and Power Equipment through authorized dealers across Canada. We also provide financing to authorized Honda and Acura dealerships.

## RESPECTING YOUR PRIVACY

We are committed to protecting the privacy of the personal information of our customers, dealer personnel and other individuals. This policy is designed to help you understand our procedures for collection, storage, use, disclosure, protection and accuracy of the personal information that we collect and control. It balances your right to privacy, with our need to collect, use and/or disclose the information for legitimate business purposes.

## WHAT IS PERSONAL INFORMATION?

In this policy, “personal information” means information about an identifiable individual. This includes such things as your name, address, telephone number, e-mail address, age or date of birth, driver’s licence information, employment history, and banking, credit and financial information.

## COLLECTING YOUR PERSONAL INFORMATION

We collect your personal information primarily from you. We may also collect it 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.

## WHAT WE DO WITH YOUR PERSONAL INFORMATION

Personal information provided by you in connection with your business relationship with us, and personal information obtained from a credit/consumer reporting agency and/or financial institution, may be used by, collected by and/or disclosed to us (including our Canadian and foreign subsidiaries, affiliates, agents and contractors) for the following purposes:

- to evaluate your credit application and your eligibility for credit;
- to enable us and our affiliates to enter into contractual relationships with you;
- for contract management and administration, such as credit, billing, collection, service, lien registration, insurance tracking and verification;
- for vehicle service and product warranties;
- to provide information and services that you request, and to respond to your comments and inquiries;
- for marketing and promotion of products, goods and services to you;
- to meet legal and regulatory requirements;
- as may be otherwise authorized by you; and

- as reasonably necessary to protect our business interests and our customers.

If your personal information is to be used or disclosed for any new purposes, we will, to the extent required by law, identify these new purposes prior to such use or disclosure and if required obtain your consent.

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.

## **TRANSFER OF PERSONAL INFORMATION OUTSIDE OF CANADA**

In some cases your personal information may be disclosed, processed and stored outside Canada, and therefore may be available to government authorities under lawful orders and laws applicable there. In particular:

- (a) Our electronic business records are maintained by our parent company on a secure server located in the United States. Any electronic records generated during the course of business transactions with us will be maintained on that server; and
- (b) If you finance a leased vehicle with us, your personal information will be shared with the service provider located in the United States who monitors and maintains information with respect to the required insurance on vehicles owned by us and leased by our customers.

You may obtain information about the privacy policies and practices relating to these service providers outside Canada by contacting us, at which time we will provide you with direct contact information, should you request same.

Any questions you have concerning the handling of your personal information by the non-Canadian service providers can be addressed to our Privacy Officer whose contact information can be found at the end of this policy.

## **YOUR CONSENT**

We may collect, use or disclose your personal information only with your consent or as permitted or required by law.

By providing personal information to us, you are consenting to its collection, use and disclosure as set forth above. We may also obtain your specific consent in a credit application or other document, or by electronic enrollment forms, survey forms, facsimile, electronic mail and telephone conversations with our employees or agents.

We also obtain consent from your legal guardian, estate, trustee 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.

The form of consent may vary depending upon the circumstances and the type of information, including the sensitivity of the information and your reasonable expectations.

You may opt in to receive marketing or promotional communications for products and services from us at the time of completing a credit application or subsequently by contacting our Customer Service Department.

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 Customer Service 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.

## **DISCLOSURE OF YOUR PERSONAL INFORMATION**

We will not sell any of your personal information that you provide us. Subject to applicable legislation, we may disclose your personal information as follows:

- 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;
- 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;
- 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;
- 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;
- to a third party or parties if the agreement that you entered into with us is transferred or assigned to such third party, for the purposes described in this policy;
- 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
- 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 and laws applicable there.

## **PRIVACY AND THE INTERNET**

On our websites we may also collect information that, alone, cannot be used to identify users. Examples of these types of non-personal information include anonymous survey responses, as well as IP addresses, cookies, Internet tags and navigational data (described in more detail below).

- An Internet Protocol (IP) address is a number automatically assigned to users' computers when they access the Internet. This number does not identify the user's name, e-mail address or other personal information. This information may be used to measure site traffic, to help to understand how people are using this website and to improve the site and services provided.
- "Cookies" are small text files that recognize repeat visitors, facilitate ongoing access to some sites, and allow sites to understand how and when pages are visited and by how many people. If you are concerned about the use of cookie technology you may opt to enable a feature in your browser software that will erase cookies, block all cookies, or warn the user before cookies are stored or exchanged. However, some parts of this website may no longer function properly if cookies are disabled.
- Internet tags (also known as single-pixel GIFs, clear GIFs, invisible GIFs, and 1-by-1 GIFs) are smaller than cookies and tell the website server information such as the IP address and browser type related to a user's computer. Tags may indicate how many times a page is opened and which information is consulted.

- Navigational data (including log files, server logs and click stream data) are used for system management, to improve the content of the site, for market research purposes and to communicate information to visitors. This may include the website you came from, your browser type, domain name and time and date of access.

Our websites (Honda.ca, MyHonda.ca, MyAcura.ca, and MyFinance.ca) may contain links to other sites. The provision of these links is for your convenience only, and does not constitute an endorsement, recommendation or approval of such other sites. This privacy policy is no longer applicable when you leave our site by way of links or otherwise. Linked sites may or may not maintain their own independent privacy policies and procedures. You should consult these policies and procedures before providing any personal information.

## **MAINTAINING THE ACCURACY OF YOUR PERSONAL INFORMATION**

We use reasonable efforts to keep your personal information as accurate, complete and up-to-date as necessary to fulfill the purposes for which we collect the information so as to minimize the possibility of using incorrect information about you. We may obtain updated information from you or from a subsidiary, affiliate, agent, contractor or authorized dealer of ours.

You or your agents, legal guardian, estate, trustee or person having power of attorney for you, 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 an 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.

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.

## **SAFEGUARDING YOUR PERSONAL INFORMATION**

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 safeguards appropriate to the sensitivity of the personal information.

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.

Methods of protection we use include:

- physical measures, for example, locked filing cabinets and restricted access to offices;
- organizational measures, for example, staff training, security clearances and limiting access on a need-to-know basis for the purposes of your business with us; and
- technological measures, for example, the use of passwords, encryption, firewalls, anonymizing software, to control access to your information on a need to know basis

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. We dispose of and destroy your personal information with care, in order to prevent unauthorized parties from gaining access to the information.

We protect your personal information that we disclose to:

- a) our subsidiaries and affiliates, by ensuring that they have privacy policies substantially similar to ours; 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 it.

## **OUR PRIVACY POLICIES AND PRACTICES**

We provide you with information about the way in which we use your personal information through: this policy and other materials; the websites located at [Honda.ca](http://Honda.ca), [MyHonda.ca](http://MyHonda.ca), [MyAcura.ca](http://MyAcura.ca), [MyFinance.ca](http://MyFinance.ca); other electronic means such as e-mail; and, through our Customer Service Department.

The following information will be made available to you upon written request:

- the name and addresses of the offices or facilities holding your personal information (including any offsite storage facilities);
- the name and information for our insurance tracking vendor in the United States where some of your personal information may be shared;
- the name and contact information for our parent company in the United States, American Honda Finance Corporation, where some of your personal information is electronically stored;
- the name and business address of our Privacy Officer;
- the means of gaining access to personal information held on you by us;
- a description of the type of personal information held on you by us, including a general account of its use and disclosure;
- 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.

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.

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 identify the reasons for refusing the request, and the recourse available to you under applicable privacy laws.

If you have 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:

**Privacy Officer**  
Honda Canada Finance Inc.  
3650 Victoria Park Avenue, Suite 302  
North York, Ontario M2H 3P7  
TEL. (416) 754-2323  
FAX (416) 754-2327  
EMAIL: [HFS\\_Privacy\\_Officer@ch.honda.com](mailto:HFS_Privacy_Officer@ch.honda.com)

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.

You may also contact The Office of the Privacy Commissioner of Canada at Place de Ville, 112 Kent Street, 3rd Floor, Ottawa, Ontario K1A 1H3, or call toll-free at 1-800-282-1376.

This policy is current as of the “Updated” 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, and may change it from time to time. Such changes will become effective 10 days after posting