
Canada

Wells Fargo International Privacy Notice

Regarding Business Representative Personal Information

Effective: 07 October 2022

At Wells Fargo Bank we are committed to protecting customer privacy and safeguarding personal information in every transaction, at every level of our organization.

This privacy policy (“Policy”) is for Wells Fargo Bank, N.A., Canadian Branch, other “Wells Fargo” named entities, their subsidiaries and affiliated entities (collectively “Wells Fargo” “we” or “us”), and applies to personal information (“Personal Information”) we collect in Canada about individuals who are principals or representatives of our business customers (“Business Customers”). See Exhibit 21 to the most recent Form 10-K we filed with the U.S. Securities and Exchange Commission at: <https://www.sec.gov/Archives/edgar/data/72971/000007297122000096/wfc-1231x2021xex21.htm> for a list of select affiliated entities and subsidiaries as of December 31, 2021. If you or the Business Customer have a relationship with Wells Fargo in the U.S. or other countries, the privacy policy or statement relating to the U.S. or such other countries will govern any information collected in the course of that relationship.

We do not use Personal Information for purposes other than as outlined in this Policy unless we have consent or are otherwise required or permitted to do so.

1. What Information We Collect

We will only collect the Personal Information we need for the purposes described in this Policy. We may collect Personal Information about consumers and representatives or principals of our Business Customers such as:

- Information establishing individual identity, such as name, signature authorization, passport, driver’s license, Social Insurance Number, other governmental identification information, home address and telephone number, documents that verify address, date of birth, country of domicile and background check information.
- Information pertaining to business relationships, such as employer, position held, length of employment, documents that verify employment, cellular telephone number and email address.
- Information pertaining to financial resources, such as salary and other income, credit history, sources of wealth, assets, and financial relationships.
- Information about customer transactions or experiences with us and other Wells Fargo affiliated companies.
- Information discussed during telephonic or electronic conversations. Wells Fargo records conversations when required by law or to create records of legally-required meetings.

The Personal Information about representatives and principals of Business Customers may be collected directly from the individuals or may be collected from the Business Customer. It is generally necessary for a Business Customer or its representatives to provide the Personal Information described in this section, for the purposes outlined below, including

providing services requested of Wells Fargo and complying with our legal or regulatory obligations or policy requirements. Failure to provide this information may result in Wells Fargo being unable to provide or continue to provide the services requested by our Business Customers.

2. How We Use Personal Information

We may use the Personal Information we collect for the following purposes:

- To provide the services requested by individual consumers or Business Customers
- To protect customer accounts from unauthorized access or identity theft
- To comply with “know your customer” obligations based on applicable anti-money laundering and anti-terrorism requirements, customer due diligence or other similar laws and regulations
- To fulfill other legal and regulatory obligations pertaining to foreign exchange and international trade laws and other laws, regulations and ordinances applicable to Wells Fargo
- To confirm a person’s authority as a representative or principal of a Business Customer organization with which Wells Fargo has entered or intends to enter into various arrangements (such as deposit contracts, loan contracts, contracts for foreign exchange transactions, contracts for derivative transactions, and letters of credit)
- In connection with guarantees of loans or services offered to Business Customers or in connection with Business Customers that are partnerships, to verify the creditworthiness of the proposed guarantor or partners and ability to collect such debts as appropriate
- To communicate with our Business Customers through a representative or a principal or directly with consumers through various channels using contact information provided
- To promote or market Wells Fargo or third-party products and services
- To make referrals to affiliated and non-affiliated organizations for other services
- To manage our risks and operations
- For other legitimate purposes required or permitted by applicable law

We will not keep Personal Information longer than necessary to fulfill the purposes outlined in this Policy. We make reasonable efforts to avoid the retention of unnecessary or duplicative information.

3. Consent and Choices

In most cases, we ask for permission to collect, use and disclose Personal Information in connection with the purposes described in this notice before we collect Personal Information. In some cases, if we obtain Personal Information from Business Customers about their business representatives or principals, we may ask them to disclose the purposes for which such Personal Information is requested and obtain consent from such representatives and principals. We may rely on representations from such Business Customers that they have provided notice and obtained consent. In some cases, we may assume consent when individuals provide their Personal Information directly to us in connection with a transaction or service for purposes of completing that transaction or providing that service. In limited situations, we may collect and use Personal Information without consent. These include when we are legally required to disclose information, for our protection (such as collection and fraud prevention) and to comply with law, regulations or regulatory authority. An individual may withdraw consent, subject to our right to continue to use Personal Information to fulfill our contracts with the customer, collect debts or as otherwise permitted or required by law.

Choices for Marketing Communications

You are in control of how we may contact you for marketing products and services, and we provide the opportunity to tell us not to use Personal information for such purposes. If you do not want to receive marketing and sales materials by direct mail, telephone, facsimile or email, please submit your request to the contact in Section 7 below or provide it to your relationship manager at Wells Fargo. We will comply with your request within a reasonable period of time after receiving it as well as with applicable law.

4. When We Share Information

We will endeavor not to share Personal Information for any purpose incompatible with the purposes listed above unless it is authorized by the individual to whom it relates, or is necessary to comply with a legal or regulatory obligation.

In order to carry out the purposes outlined in Section 2, we may transfer Personal Information to other Wells Fargo affiliated entities both within and outside Canada. Wells Fargo has affiliated entities operating in Canada, the United States and around the world. Personal Information processed or stored outside Canada may be accessible to the applicable foreign jurisdiction's law enforcement and national security authorities.

We may use the Personal Information to provide a variety of products and services that may be offered by affiliated entities. If you prefer that we not share your Personal Information with Wells Fargo affiliated entities for such purposes, you may submit your request to the contact in Section 7 below. We reserve the right to transfer Personal Information as permitted by applicable law or to service existing relationships with our customers.

Wells Fargo may from time to time transfer Personal Information to other parties that perform services on our behalf, such as service providers, accountants, auditors and legal counsel. These service providers may be located in the United States or other jurisdictions which may not provide the same level of data protection as Canada. We remain responsible for the Personal Information we transfer to service providers and take reasonable steps to require those service providers to keep the information confidential and safeguard it.

There are also a limited number of additional circumstances in which we may share Personal Information with third parties such as:

Legal Requirements:

Subject to applicable law, we may disclose Personal Information if required or permitted by law or regulation or in the good faith belief that such action is necessary to:

- Comply with a legal obligation or in response to a request from public authorities or self-regulatory bodies to which we are subject, wherever we may do business
- Protect and defend the rights or property of Wells Fargo
- Detect, prevent or report to law enforcement agencies fraud or other illegal activity
- Verify identity and conduct required due diligence
- Act in urgent circumstances to protect the personal safety of clients and workers/employees of Wells Fargo or the public
- As permitted or required by law
- Protect against any legal liability

Business Transfers, Combinations and Related Activities:

As we develop our business, we might sell, buy, restructure or reorganize businesses or assets. In the event of any actual or proposed sale, merger, reorganization, restructuring, dissolution or any similar event involving our business or assets,

Personal Information may be shared with the relevant entity or may be part of the transferred assets. The recipient will be obligated to manage the Personal Information it receives from us in accordance with the Privacy Policy then in effect.

Personal Information transferred to service providers, Wells Fargo affiliated entities or regulatory bodies or other third parties located in other jurisdictions is subject to the laws of those jurisdictions and may be available to Governmental agencies or law enforcement in those jurisdictions. For more information about our policies and procedures relating to use of service providers outside Canada, refer to the contact information in Section 7.

Programs

We may from time to time enter into contracts with third parties for programs that provide products and services to our Business Customers. Pursuant to your express consent, we may disclose Personal Information about you to those third party program providers.

5. Safeguarding and Managing Information

We take reasonable and appropriate measures to keep Personal Information accurate, and up-to-date. In an effort to prevent the loss, misuse, unauthorized access, disclosure, alteration or destruction of Personal Information, Wells Fargo will take appropriate physical, organizational and technical measures to protect Personal Information. For example, we limit employee access to personal information to those who have a business reason to know. We also contractually require service providers to maintain strict security standards. All Wells Fargo entities follow the same set of data security policies to protect Personal Information.

6. Requests for Access or Correction of Personal Information

Requests to access or correct any Personal Information held about you must be submitted in writing to the address listed in Section 7 below. After we have verified your identity, we will endeavor to provide you with the information you have requested within the time specified by local law or within a reasonable period of time, and, where permitted by law, may charge an appropriate fee to cover the costs of responding to the request. If the information about you is shown to be inaccurate, we will endeavor to correct it as appropriate. If we decline to provide the Personal Information held or to make the correction requested, we will provide you with the reasons for declining the request.

7. Customer Inquiries

We oversee our compliance with this policy and law. Please direct all requests relating to access, correction, marketing opt outs, complaints, and any questions regarding this Policy to:

Canada

Americas Regional Privacy Officer
23rd Floor, 22 Adelaide Street West
Toronto, Ontario
Canada M5H 4E3
Telephone: (416) 607-2900
canadaprivacyinfo@wellsfargo.com

Your comments are valuable to us, and we assure you that we will do our best to address them.

8. Modifications

This Policy may be modified as a result of amendments to the law or regulations or due to other reasons. In such case, an amended Policy will be posted on our website at <https://www.wellsfargo.com/privacy-security/>. The page providing the Policy shall contain a date as to when the Policy was last updated. We will not materially change the purposes for which we use or disclose your Personal Information without first obtaining your consent. This policy is available in English and French at the website listed above.