

This Digital Privacy and Interest-Based Advertising Policy, along with the MD Privacy Agreement, describes how MD uses cookies and other technologies to provide our clients and business partners (“you”) with personalized products and services.

This Policy applies to MD Financial Management (“MD” or “we” or “us”).

INFORMATION WE COLLECT AND USE WHEN YOU VISIT OR USE AN MD WEBSITE OR MOBILE APPLICATION

We collect information about the computer or device you use to access our website or one of our mobile applications, including IP (Internet Protocol) address, mobile device identification number, MAC address or other device identifier, the make and model of your device, its operating system, information about the screen size, page requests, browser type, average time spent on our website or app and date and time of your use.

We use this information to determine which settings are appropriate for your computer or device, to provide or enhance digital functionality and for security purposes including fraud prevention, internal analysis and reporting. We also may use this information to help us understand our website and mobile application activity and to monitor and improve our website and mobile applications.

TECHNOLOGIES WE USE

We use cookies and other technologies such as pixel tags and web beacons.

A “cookie” is a piece of data that a web browser creates when you visit a website. This data is information about how and when you use a site. It is placed on your computer, smartphone, or tablet (“online device”) in the form of a small text file.

There are two main types of cookies:

- **Session cookies:** these are temporary cookies that expire when you leave the site. Session cookies allow the website to recognize you as you navigate between pages during a single browser session and allow you to use the website most efficiently.
- **Persistent cookies:** in contrast to session cookies, persistent cookies are stored on your online device between browsing sessions until expiry or deletion. They therefore enable the website to “recognize” you on your return, remember your preferences, and personalize services to you.

We use both session cookies and persistent cookies on our website. The benefit of enabling cookies is that it will allow your use of MD’s websites to be faster, easier and tailored to your interests.

Pixel tags and web beacon technologies provide information about how you interact with our websites, mobile applications, and emails. For example, pixels can be used to determine whether an email has been opened or forwarded and how much of it has been viewed. These technologies may communicate with servers to obtain images and other content and to relay information about the IP address being used to access our site and information about your browser. We may use the information we obtain through these technologies to serve you targeted ads, as described below under “What is interest-based advertising?”

WHY WE USE THESE TECHNOLOGIES

- **To collect statistical information:** We use these technologies to collect and evaluate statistical information on how you use our websites to help us improve our websites, products and services.
- **To measure engagement:** We use these technologies to gain a better understanding of client behaviours on our websites to develop engagement strategies to better serve you and make it easier for you to navigate our websites and find information about our products and services. This data may be matched with other information we have about you to provide you with personalized marketing communications and services that better reflect your needs.

- **To advertise or make offers:** We use these technologies to serve MD advertisements and offers tailored to you or that may be of interest to you on third-party websites. For more information on interest-based advertising see “What is interest-based advertising?” below.
- **For analytics:** We may use web analytics services such as Adobe Analytics and Google Analytics to help us analyze how visitors use our websites so that we can better understand and improve our websites. These third parties may collect your IP address or device identifier on the date you visit a site as well as the number of visitors to our site, where visitors have come to the site from and the pages they visit. For example, with Google Analytics, the information generated by the cookie about your use of the site (including your IP address) will be transmitted to and stored by a Google server. Google uses this information for the purpose of evaluating your use of the site, compiling reports on site activity for us, and providing us with other services relating to site activity and internet usage. For more information, see [“How Google uses information from sites or apps that use our services”](#) and [“Safeguarding your data.”](#) For instructions on how to opt-out of Google Analytics and Adobe Analytics, please see “How to control or refuse cookies” below.
- **To authenticate your computer:** We use these technologies to gather information such as IP address and browser type to authenticate you and your computer and to detect and prevent fraud.
- **For security and verification:** We use these technologies to help us maintain security and verify your details while you navigate from page to page on our websites, which enables you to avoid having to re-enter your details each time you enter a new page.
- **To personalize content:** We use these technologies to remember how you have customized your use of our websites, such as your preferred currency and time zone, and to personalize your experience on our websites and mobile applications.
- **To improve your user experience:** We use these technologies to collect information about your activity on our websites to enable us to better understand and improve your user experience when using our websites; for example, a cookie that recognizes if your browser supports specific technology features. This helps, for example, in enabling websites to be loaded more quickly when you request the download of a large file.

WHY WE COLLECT INFORMATION ABOUT YOUR LOCATION

We offer mobile applications or other products and services that use information about your location. If you choose to use such applications or services, we may, with your consent, collect information about your location to provide you with services you request (for example, to show you the nearest branch) or to protect you and us from fraud.

HOW TO CONTROL OR REFUSE COOKIES

You can limit the collection of your information by disabling cookies on your browser. You may also be able to modify your browser settings to require your permission each time a website attempts to set a cookie. However, our websites (and many other websites) rely on cookies to enable certain functionality. If you choose to disable cookies, some of the services or functionality available on our websites may not work properly.

You can prevent the storage and processing of data relating to your use of the site by Google and Adobe as follows:

- You can opt-out of Adobe Analytics using Adobe Opt Out Settings.
- You can opt-out of Google Analytics by installing Google’s opt-out browser add-on.

To opt-out of interest-based advertising, please see “How to opt-out of interest-based advertising” below.

WHAT IS INTEREST-BASED ADVERTISING?

Interest-based advertising allows us to deliver advertisements and offers that are more relevant to you and your interests. It works by showing you advertisements and offers that are based on your browsing patterns and the way you have interacted with our websites. We use third parties such as ad networks, advertisers and other partners who use their own technologies (including cookies and pixel tags) to collect information about your activity on our websites and on third-party websites (such as those you visit and your interaction with our advertising and other communications). This information is used to make predictions about your preferences and deliver ads that are more relevant to your perceived interests when you are on our websites or third-party websites. We may also share this information with a limited number of trusted business partners that wish to advertise to you.

If you click one of our advertisements or offers, we may also track the response rate and the website activity associated with it to evaluate the effectiveness of our online campaigns.

HOW TO OPT-OUT OF INTEREST-BASED ADVERTISING

As part of our commitment to fair information practices, MD is a participant and supporter of the Digital Advertising Alliance of Canada's (DAAC) "AdChoices" program and adheres to the DAAC Canadian Self-Regulatory Principles for Online Behavioural Advertising.

AdChoices is a self-regulatory program that requires participating companies to include an AdChoices icon in any ads that use interest-based advertising. It's intended to provide consumers with greater transparency around interest-based advertising and to give them the ability to opt-out of this type of targeting. You can learn more at youradchoices.ca. You can also click on the AdChoices icon which appears at the bottom (or top) of our websites or ads.

For more information about interest-based advertising on your desktop or mobile browser and to understand your options, including how you can opt-out of receiving interest-based ads from third-party advertising companies participating in the Digital Advertising Alliance of Canada Self-Regulatory Program for Online Interest-Based Advertising, please visit the DAAC website at youradchoices.ca/choices.

You can also opt-out of interest-based Adobe ads using Adobe Opt Out Settings and from interest-based Google ads using Google's Ads Settings.

Important notes about your opt-out:

- If you opt-out of interest-based advertising by a third party, these technologies may still collect data for other purposes including analytics and you will still see ads from us across the Internet, but the ads will not be targeted based on behavioural information about you and may therefore be less relevant to you and your interests.
- Interest-based advertising opt-outs work by saving cookies in your browser that tell the various ad partners that you have opted-out. Because cookies are generally browser-specific, your choice will only apply to the web browser from which you opt-out. You must opt-out from each web browser from which you do not want interest-based advertising (and this may involve different devices, if you use more than one).
- If you delete or clear your browser's cookies, you will need to opt-out again.

HOW TO PROTECT YOUR SECURITY

Browsers such as Microsoft Internet Explorer allow you to store passwords and logon IDs so you do not need to re-enter this information each time you access a web site. **To prevent unauthorized use of your online access codes, MD strongly urges you to NOT use this functionality.**

HOW WE WILL NOTIFY YOU OF CHANGES TO THIS POLICY

We may change this Policy from time to time to reflect changes in our practices. We will display the changed Policy on our website. We encourage you to visit our website frequently to stay informed.

HOW TO CONTACT US

If you have any questions about this Policy or our interest-based advertising practices, please contact the MD Chief Privacy Officer:

Tel.: 1 800 267-4022
Email: Privacy-MD@md.ca
Letter: Privacy Office
1870 Alta Vista Dr.
Ottawa ON K1G 6R7