



# PRIVACY POLICY

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Effective March 2016

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## 1. Privacy statement

At TDB, we are committed to ensuring the privacy of your information. We understand, as a user of the Bank's websites (including social media sites) and internet banking services, how important the privacy of your personal information is to you.

The following privacy statement has been developed in recognition that internet technologies, and specifically TDB's application of these, are rapidly evolving. This privacy statement demonstrates our commitment to the privacy of your personal information which we may obtain online about you when you visit the TDB website. It provides a clear outline of how your personal information will be treated as you access and interact with the TDB website.

We are committed to protecting your personal information and will only use such information for the purposes set out below.

## 2. Information we collect

We may gather four types of information about the users of TDB properties:

1. **Personal information** provided voluntarily when you complete an online form, enter a competition, complete a survey, make an enquiry, or otherwise input text or values into TDB properties. For example: name, mailing address, phone number, email address, user name, date of birth, contact preferences, activity logs specific to our internet banking systems, or when you share content from a TDB managed social media account.
2. **Financial information** offered by you when applying for a product. For example: information about your financial position and your current credit history.
3. **Technical information** that identifies the computers or devices you use to access TDB properties and the manner by which you use them. For example: IP address; cookie, device, browser, operating system identifiers and location information provided when you connect to TDB properties.
4. **Usage information** regarding your activities on TDB properties. For example: the date and time of visits, pages visited, interactions with tools, calculators & advertising.

## 3. How we use personal information

We may use personal information to:

- respond to your enquiries and fulfill your requests;

- inform you about important information regarding the Site, products or services for which you apply or may be interested in applying for, or in which you are already enrolled, changes to terms, conditions, and policies and/or other administrative information;
- deliver marketing communications that we believe may be of interest to you, including, ads or offers tailored to you;
- personalize your experience on TDB's website;
- allow you to apply for products or services (e.g., to prequalify for a mortgage, apply for a credit card, or to open a financial product) and evaluate your eligibility for such products or services;
- verify your identity and/or location in order to allow access to your accounts, conduct online transactions and to maintain measures aimed at preventing fraud and protecting the security of account and Personal Information;
- allow you to participate in surveys and other forms of market research, contests and similar promotions and to administer these activities. Some of these activities have additional rules, which may contain additional information about how Personal Information is used and shared;
- allow you to use some of TDB's online financial planning tools. Information that you enter into one of these planning tools may be stored for future access and use. You have the option not to save the information;
- consolidate your financial account information at one online location, understand what product or service may be of interest to you, and present you with offers;
- verify your identity and account status, which we may combine with information collected from offline sources or information we already have;
- assist with data analysis, audits, developing and improving products and services, enhancing the website, identifying usage trends and determining the effectiveness of promotional campaigns;
- assist with risk control, such as fraud detection and prevention; and
- comply with laws and regulations, legal process and law enforcement requirements.

#### **4. Acceptance of privacy policy**

Your use of the TDB website indicates your acceptance of:

- (a) the TDB's Online Banking Terms and Conditions;
- (b) the TDB's Online Bank Security Policy; and
- (c) the TDB's Privacy Policy.

Should we change our privacy statement for any reason; those changes will always be posted to this page. If you have any further questions relating to this privacy statement, please do not hesitate to contact us.

## **5. General Disclaimer**

Access to or use of the TDB website constitutes consent to the following terms.

The TDB has taken reasonable measures to ensure that the information and data presented on this website is accurate and current. However, the TDB makes no express or implied warranty regarding such information or data, and hereby expressly disclaims all legal liability and responsibility to persons or entities who use or access this site and its content, based on their reliance on any information or data that is available through this website.

The information available on this website is not intended to constitute and should not be considered as legal advice, nor is it intended to substitute for obtaining legal advice from competent, independent, legal counsel in the relevant jurisdiction. Transmission and receipt of this information is not intended to create and does not constitute an attorney-client relationship. This website does not purport to authoritatively interpret current laws or regulations of Tonga, nor does it bind the TDB or any other agency or entity with regard to the matters presented.

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