

PRIVACY POLICY

"We", "our", and "us" refer to ResMor Trust Company (offering the product line Ally), and "you", "your", and "Customer" refer to each person in whose name an account has been opened or person who browses our site as a visitor.

Privacy Promise

Protecting your privacy is our priority.

Overview

You take your privacy seriously and so do we. We are a company committed to securing the personal information and protecting the privacy of our customers. This Privacy Policy is one way of sustaining your trust in our company, our products, and our services. This Privacy Policy describes how we collect, protect, and use information about you either during your visit to our Website or when you are our customer.

This Privacy Policy is effective July 1, 2009, and remains in effect until amended. We reserve the right to amend this Privacy Policy at our sole discretion without notice to you. We will post any amendments to this Privacy Policy on our Website, so please check periodically.

Customer Information

Customer Data Protection

We use security measures that comply with the Personal Information Protection and Electronic Documents Act (PIPEDA).

We train our employees on handling and securing customer data to maintain a culture of protection and security.

Access to Information

At your request, we will provide you with access to any personal information that we collect about you as required by PIPEDA. We may provide customers with access to Account information in different ways, including by mail, email, telephone, or other form of telecommunication, as further set out below. There are, however, situations where we will not be able to provide you with your information due to legal constraints, such as if the information also contain references to other persons.

Correcting Information

We are committed to maintaining accurate and up-to-date information on all of our Customers. As a Customer, you may update some of your information online by logging into your Account in order to utilize this feature. You can also help us maintain accurate and up-to-date information by telling us immediately of any errors in your information that you become aware of.

866-247-ALLY (2559) | Visit www.ally.ca

P.O. BOX 350 STN. C, TORONTO, ON M6J 3N1

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How to contact us regarding your account:

Mail: Ally Customer Care
P.O. BOX 350, STN. C
TORONTO, ONTARIO M6J 3N1

Phone: 1-866-247-2559

Retention of Your Information

We will only retain your information to the extent:

- it is needed for the purposes which we have conveyed to you;
- we are required by law to maintain such information; or
- it is needed for us to address any issues or inquiries that you may have.

When your information is no longer required, we will dispose of such information by destroying it or erasing it in accordance with our record retention policy.

Withdrawing Consent

You may decide that you do not want us to use or share your personal information. You may withdraw or refuse to provide your consent by calling us at 866-247-2559 or by Ally Secure Email, and where we are not legally prohibited from doing so, we will use our best efforts to inform you of the consequences of such refusal or withdrawal of consent (which may include not being able to continue to provide you with certain products or services) and to promptly process your request.

Information We Collect About You During Your Online Visit

Website Visitors

When you browse our site as a visitor or are an unregistered user of this Website, we may collect and store information about your online visit (see "Cookies"). This information may include the time and length of your visit, the pages you view on our site, the last site you visited before coming to ours, your IP address, your geo-demographic data and the name of your Internet service provider.

We use this data on an aggregate basis to measure site activity, and on an individual basis to make the site more useful and provide information that may be of interest to you.

- provide information to us about you when you complete an online application or other form;
- provide information to us about you during Web page registration; or
- provide information to us about you during personal profile updates.

Information Collection and Sharing Practices for Customers

Information We Collect About You as a Customer

In addition to all of the information collected and stored for Visitors, we collect our Customer's personal information including, but not limited to your name, address, birthdate, occupation and SIN.

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How We Collect Your Information

We collect information about you, for example, when you:

- apply for a product or service, in order to identify you and process your application and
- use your account

Why We Collect Your Information

We collect, use, and share your personal information in order to:

- identify you and process your application for a product or service;
- where applicable, assess and update your creditworthiness on an ongoing basis;
- establish, maintain, service, process, analyze, and audit your relationship with us, including collecting any money you owe us;
- protect all parties from error and fraud;
- administer the delivery of products and services to you;
- determine your eligibility for products and services;
- market and sell products and services that may be of interest to you;
- comply with legal and regulatory requirements, including (but not limited to):
 - responding to a court order, search warrant, or other demand or request;
 - or
 - complying with requests for information from regulators; or
- purchase or sell all or part of our business or when contemplating such transactions.

Monitoring of Calls / Live-Chats

We monitor or record your telephone conversations and Live-Chat sessions with our Customer Care Associates in order to provide the best customer service to you, and to keep a record of our conversations and sessions with you for your and our protection, for training purposes, or to confirm our discussions with you.

Social Insurance Number Privacy Protection

We are required by law to obtain your Social Insurance Number (SIN) when you open an account with us that earns income. This is for tax reporting purposes.

For your protection, we also request your SIN during the application process to ensure that we're authenticating your identity (i.e. as a tool to identify you and to distinguish you from other individuals with a similar name). Please be aware that providing your SIN in this way is voluntary. Not providing your SIN for this purpose will not in itself prevent you from obtaining any products or services with us. If you wish to apply without using your SIN for identification purposes, please contact us toll free at 1-866-247-ALLY to process your request.

Information We Share About Our Customers

What We Share

We may share personal information that includes, but is not limited to, your:

- name, address, and other account application information;
- account balances, transactions, and payment history; or
- creditworthiness, including credit history and credit score.

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With Whom We Share

We may disclose some of the information we collect about you to third parties such as credit reporting agencies, regulators, and loan investors. These types of third parties are called nonaffiliated third parties. We may also share some of this information with companies performing services on our behalf, such as the vendor who prepares and mails our monthly statements and the vendor who runs our call centre. These types of vendors are called service providers.

We may share information we collect about you with companies with whom we have formal agreements to offer other products and services. These types of relationships are called joint marketing partnerships.

Finally, we may share information we collect about you with companies related by common control (**i.e., GMAC Financial Services, Ally Bank, GMAC Insurances, Ditech, etc.**) to offer you products and services that may be of interest to you. These types of companies are called affiliates.

Except as described in this Privacy Policy, we will not share your information that we have collected unless we have your consent (either expressly provided, implied through the use of our products or services, or implied when you approach us to inquire about our products or services).

IN CONNECTION WITH THE DISCLOSURE OF YOUR INFORMATION DESCRIBED ABOVE, SOME OF THE PERMITTED RECIPIENTS (AFFILIATES, NONAFFILIATED THIRD PARTIES, SERVICE PROVIDERS, OR JOINT MARKETING PARTNERSHIPS) ARE LOCATED IN COUNTRIES OTHER THAN CANADA, INCLUDING THE UNITED STATES. AS A RESULT, WE MAY BE REQUIRED TO DISCLOSE YOUR PERSONAL INFORMATION TO GOVERNMENT AUTHORITIES, REGULATORS, OR LAW ENFORCEMENT IN ACCORDANCE WITH THE LAWS OF THESE JURISDICTIONS, WHICH MAY, IN THE CASE OF THE UNITED STATES, INCLUDE THE USA PATRIOT ACT.

A Note on Marketing

It is our common practice to notify new and existing customers of discounts and new products and services they might enjoy. Such notification can occur by mail, email, telephone, or other form of telecommunication as set out under "Customer Information" above. These offers may include products and services from us, our affiliates, non-affiliated third parties, service providers, or joint marketing partnerships.

You may decide that you do not want your personal information used or shared for marketing purposes. If this is the case, you may always withdraw or refuse your consent at any time by calling us toll-free at 866-247-2559 or, if you're an existing customer, logging in to your account and sending us a message through Ally Secure Email. You should be aware that if you decide to withdraw or refuse your consent, our ability to communicate with you will be diminished. For example, we will generally not be able to tell you about price discounts, innovative reward programs, or other products and services that we may introduce in the future.

We may also use the personal information collected from you or others for purposes of conducting research (including surveys) to better understand your needs and requirements, and to understand your satisfaction with our meeting such needs and requirements.

Security Statement

About our Website(s)

Cookies

We may use Web cookies for security purposes to recognize your computer when you log into your Account. We may also make use of Web cookies or similar data on certain parts of our Website for fraud

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prevention and other purposes. If you disable your Web browser's ability to accept our Web cookies, it may not be possible for you to access your online account.

Passwords

Your access to certain portions of our Website may be protected with an individualized Username and Password. Your Username and Password are confidential and personal to you, and should never be disclosed or shared with anyone else.

Timed logout

Certain portions of our Website may be protected with a timed-logout feature. This can help protect your Account from being viewed or used by others if your computer becomes unattended.

Encryption

We may use encryption to protect your information as it travels across the Internet. This can help prevent others from eavesdropping on your browser sessions with our Web servers.

Firewalls

Our Website may be protected with firewall technology, which can help prevent your Account information and our Website from being improperly accessed.

Surveillance

Certain portions of our Website are monitored by advanced surveillance and logging technologies. These technologies can help to ensure that both your information and our Web servers are protected from compromise.

Identity Theft / Fraudulent Activities

Theft/Fraud

Identity theft occurs when an individual uses your information without your permission to commit fraud or other crimes, such as account takeover or application fraud. Account takeover has occurred when an individual acquires your existing credit-account information and purchases products and services at your expense. Application fraud has occurred when an individual uses your Social Insurance Number or other information to open new credit accounts in your name.

If you believe you are a victim of identity theft, contact the two major credit bureaus listed to place a fraud alert message on your credit file.

TransUnion

All provinces except Quebec:

Fraud Victim Assistance Department
P.O. Box 338, LCD 1
Hamilton, Ontario
L8L 7W2

Phone:
800-663-9980

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Residents of Quebec:

Centre De Relations Aux Consommateurs TransUnion

1 Place Laval Ouest , Suite 370
Laval, PQ
H7N 1A1

Phone:
877-713-3393
514-335-0374 (in Montreal)

Equifax Credit Information Services

Consumer Fraud Division
P.O. Box 190 Jean Talon Station
Montreal, PQ
H1S 2Z2

Phone:
800-465-7166
514-493-2314

You may also request a copy of your credit report. You should carefully review your credit reports for: accounts you did not open, inquiries from creditors you did not initiate, and for personal information (such as home address and Social Insurance Number) that is not accurate. If you see anything you do not understand or any accounts you did not open, call the credit reporting agency at the telephone number on the report.

If you decide not to place a fraud alert on your credit file, you can still obtain free copies of your credit report by calling the above noted phone numbers.

Questions

Questions about this Privacy Policy may be directed to our Privacy Officer at 866-247-ALLY (2559).

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