

**HARLEY-DAVIDSON FINANCIAL SERVICES CANADA, INC.**  
**Privacy Policy**

This privacy policy governs the actions of Harley-Davidson Financial Services Canada, Inc. (referred to below as “HDFSC”, “we” or “us”), and of its Affiliates (as defined below) and service providers, as they relate to the collection, use and disclosure of your personally identifiable information (“Personal Information”). Our privacy policy is based upon the values set by the Canadian Standards Association’s Model Code for the Protection of Personal Information and Canada’s *Personal Information Protection and Electronic Documents Act* (“PIPEDA”).

For the purposes of this policy, HDFSC’s “Affiliates” include Harley-Davidson, Inc., Harley-Davidson Motor Company, Harley-Davidson Financial Services, Inc., Harley-Davidson Credit Corp., Harley-Davidson Financial Services, International, Harley-Davidson Financial Services, Europe, and Eaglemark Savings Bank.

Our privacy policy may be amended from time to time. Please visit our website at <https://creditapplication.harley-davidson.com/ca/en/privacy> or contact our Privacy Officer, as described in [paragraph 10](#) below, for the most up-to-date version of this privacy policy.

### **1. Types of Personal Information Collected**

HDFSC, its Affiliates and/or service providers, may collect the following Personal Information about you:

- Your name, address, how long you have lived at your current address, phone number, email address, ID numbers (including driver’s license and Social Insurance Number), date of birth, current income, references (names, addresses, phone numbers, relationship to you), and employment information (name of your current employer, occupation and length of service);
- Credit-related information that you provide to us or our Affiliates or service providers in order to assess your eligibility for and provide our financial services and products, including bank account activity, bank account balances, consumer credit reporting bureau information (credit scores, payment history, number and amount of trade lines, delinquencies, judicial actions related to debt including bankruptcies, collections, repossessions) and purchase history; and
- Any other Personal Information you voluntarily disclose to us during the course of inquiring about, applying for or utilizing our products or services.

Other information may be collected about you and used to market Harley-Davidson products or services based upon your visits to <https://creditapplication.harley-davidson.com/ca/en> (the “Website”). Please see [paragraph 7](#) below and HDFSC’s [Cookie Policy](#) for more information.

### **2. How Collection Occurs**

HDFSC may collect your Personal Information at the time you make inquiries about or apply for our products and services (including by filing a loan or financing application through our Website) or otherwise communicate with our customer service or sales teams.

HDFSC, its Affiliates and/or service providers may also collect your Personal Information from third parties, including those you list as references in your application for our products and services, your employer, your landlord or mortgage holder, your bank, and credit reporting agencies or bureaus. By applying for our products and/or services, you agree that HDFSC, its Affiliates and service providers may obtain such information about you from third parties, and you authorize these sources to release this information to HDFSC, its Affiliates and service providers.

Information about Website visitors is also collected through the use of cookies, as described further in [paragraph 7](#) below and HDFSC’s [Cookie Policy](#).

### **3. Purposes**

HDFSC, its Affiliates and/or service providers collect, use and disclose your Personal Information to (a) establish your identity; (b) assess your current and ongoing financial, personal and professional situation (including confirming your employment and residence status); (c) assess your eligibility for our products or services (for example, to process your application for credit); (d) make a decision about your eligibility for our products or services; (e) provide you with the product or service you have requested (if approved); (f) administer, monitor, evaluate and service any loan or credit agreement and collect any amounts owing to HDFSC or its Affiliates; (g) assign, whether as security or otherwise, any or all of HDFSC’s right, title and interest in respect of your loan or credit application and agreement, and all documentation relating thereto; (h) where permitted by applicable law, promote, determine your eligibility for, and communicate with you in respect of other products and services we believe may be of interest to you; (i) provide customer service and communicate with you in respect of your application, products and services, including responding to your enquiries; (j) for other reasonable purposes related to managing HDFSC’s business, including to meet legal and regulatory requirements, protect you and HDFSC from fraud and error, and maintain business records; and (g) otherwise as permitted or required by applicable law.

Information collected about visitors to the Website may be used to evaluate the design, content, navigation, use and functionality of the Website, to better tailor visitors' experience when using the Website, to compile data about Website usage and patterns, and to deliver advertisements relevant to visitors' use of the Website and other Internet browsing activities. For more information, please see [paragraph 7](#) below and HDFSC's [Cookie Policy](#).

The purposes for which we collect Personal Information will be identified before or at the time we collect the information. In certain circumstances, the purposes for which Personal Information is collected may be clear, and your consent may be implied, such as where your name, address, references and financial information are provided by you as part of the loan application process.

#### **4. Consent**

Consent for the collection, use and disclosure of Personal Information may be expressly given or implied. Your express consent may be given in writing, verbally or through electronic means. Your implied consent may be given through an action you have taken, such as supplying your Personal Information for a specified purpose. Each time you provide your Personal Information to HDFSC, or its Affiliates or service providers, you consent to the collection, use and disclosure of such information in accordance with this privacy policy.

Providing us with your Personal Information is always your choice. However, your decision not to provide certain information may limit our ability to assess your eligibility for or to provide you with our products or services. HDFSC will not require you to consent to the collection, use or disclosure of your Personal Information as a condition of supplying you with a product or service, except as required to be able to supply the product or service or as required by law.

#### **5. Use and Disclosure**

Personal Information will only be used or disclosed for the purpose(s) for which it was collected, unless you have otherwise consented, or when use or disclosure is required or permitted by law. We will not disclose your Personal Information to any third party, except as set out below.

#### **Employees**

Your Personal Information will be accessible to employees of HDFSC and its Affiliates, including employees in the sales, marketing, customer service, loan origination, underwriting, funding, servicing, administration (management, compliance, risk, internal audit, accounting), and information services departments who have a need to know such information for the purposes outlined above.

#### **Third Party Services**

There are certain services supplied to us by third parties, which may require that we share your Personal Information with third party service providers or allow them to collect or access Personal Information for the same purposes that we collect, use and disclose your Personal Information, as outlined in this privacy policy. For example, HDFSC currently engages third parties in each Province of Canada to provide the following services:

- Bailiffs and skip tracers to locate the collateral and/or borrower;
- Transporters to transport the collateral; and
- Appraisers to appraise the collateral.

For more information about the specific third parties that we currently engage with respect to the above services, please contact our Privacy Officer, as described in [paragraph 10](#) below.

HDFSC also engages third party data analytics and marketing service providers, who use cookies to target certain advertisements to be sent or directed to Website visitors, based on the pages, topics or links they have shown an interest in. For more information about the specific third parties engaged by HDFSC to perform such services, please see the [Cookie Policy](#).

#### **Independent Dealerships**

HDFSC may also share your Personal Information with independent Harley-Davidson dealerships for the purposes of processing your loan application as well as selling or advertising their products and services. Each independently owned Harley-Davidson dealership has their own privacy policy which governs how they handle your Personal Information. You should contact the independently owned Harley-Davidson dealership for their privacy policy and practices.

#### **Affiliates**

HDFSC may share your Personal Information with its Affiliates (as defined above), who will only use such Personal Information for the same purposes as we do.

#### **Legal Requirements**

There are a number of other circumstances where HDFSC may collect, use or disclose Personal Information without notice or consent when required or permitted by law or lawful authority.

From time to time, we may be compelled by legal action to release information (e.g. statutory reporting requirement, search warrant, court order, bankruptcy or insolvency proceedings or other legally binding requests).

We may also disclose Personal Information without consent if it is to be used in an emergency that threatens the life, health or security of the individual, when investigating a potential breach of contract or law, or when collecting unpaid amounts owed or owing to us.

## **6. International Transfer of Personal Information**

We use service providers located in Canada and the United States, or elsewhere outside of Canada, to collect and process some Personal Information on our behalf. Some of our Affiliates are also headquartered outside of Canada, including in the United States. Accordingly, your Personal Information may be transferred outside of Canada to a country that does not have the same data protection laws as Canada. Such Personal Information will be subject to the legal requirements of the applicable foreign jurisdiction(s) and may be accessible to courts, law enforcement and national security authorities in each jurisdiction where it is accessed, processed and stored. To obtain written information about our policies and practices relating to our service providers outside of Canada, please contact our Privacy Officer, as described in [paragraph 10](#) below

## **7. Our Website**

### **Cookies**

Our Website uses first- and third-party cookies. A cookie is a small computer file or piece of information that may be stored in your computer's hard drive when you visit our Website. We use cookies to improve our Website's functionality and, in some cases, to provide visitors with a customized online experience. HDFSC (and third-party service providers acting on our behalf) also employ use tracking technologies (including cookies and pixel tags) on our Website in order to provide tailored advertisements on HDFSC's behalf and on behalf of other advertisers across the Internet. HDFSC and its service providers may collect information about your activity on our Website and other websites, as well as your interaction with our advertising and other communications, and use this information to determine which advertisements you see on websites and applications.

Most web browsers are configured initially to accept cookies automatically. You may be able to change your Internet browser or device settings to prevent your computer from accepting cookies or to notify you when you receive a cookie so that you may decline its acceptance. Please refer to the documentation for your browser or device regarding how to allow or refuse cookies. Please note, however, that if you disable cookies, you may not experience optimal performance by our Website. In particular, if cookies are completely disabled, you will not be able to fill out the online version of the credit application. You may contact your local Harley-Davidson dealership to obtain a paper copy of the loan application instead.

For more information about HDFSC's use of cookies, including the type of information they collect, how that information is used, and the service providers involved in collecting, using and processing such information, together with how to opt-out, please review our [Cookie Policy](#).

### **Other Websites**

Our Website may contain links to other third party websites that are not governed by this privacy policy. Although we endeavour to only link to sites with high privacy standards, our privacy policy will no longer apply once you leave our Website. Therefore, we suggest that you examine the privacy statements of any third party websites to learn how your information may be collected, used, stored and disclosed.

## **8. Storage, Safeguarding & Retention of Customer Information**

Your Personal Information may be kept in electronic or paper format in our offices in Plano, Texas, Carson City, Nevada, Chicago, Illinois and Milwaukee, Wisconsin.

Personal Information will be protected using physical, technological and organizational safeguards that are designed to secure Personal Information from accidental loss or theft and from unauthorized use, access, disclosure, alteration and destruction. We use Secure Sockets Layer (SSL) technology to protect your information as it is transmitted to us. We also employ user authentication procedures and other preventative technologies designed to keep your data secure and protected. Access to Personal Information stored by us is limited to authorized HDFSC and Affiliates' personnel who require access to perform their job functions, and to authorized third parties that are contractually required to keep your information confidential and secure.

Please note, however, that no method of transmitting or storing Personal Information online is completely secure. As a result, while we strive to protect your Personal Information, you should be aware that there are security and privacy limitations of the Internet which are beyond our control. The security, integrity and privacy of any and all information and data exchanged between you and us through our Website, by email or other electronic means cannot be guaranteed, and any such information and data may be viewed or tampered with in transit by a third party. You are responsible for taking all reasonable steps to protect your Customer Account ID and password. Please store these in a safe location and do not share them with any third party.

Personal Information will only be retained by HDFSC for the period of time required to fulfill the purpose for which we collected it or as may be required or permitted by law.

You should be aware that submitting an application to HDFSC for a loan can impact your credit as a “hard inquiry”.

## 9. Access to Your Information

Upon request, you will be informed of the existence, use and disclosure of your Personal Information, and may be given access to your Personal Information. You may also verify the accuracy and completeness of your Personal Information and may request that it be amended. Such a request must be in writing and should be sent to our Privacy Officer, as described in [paragraph 10](#) below.

Access to your Personal Information will generally be provided free of charge. However, if you request that information be copied or transmitted to you, we may charge a reasonable fee where permitted by applicable law.

In some circumstances, HDFSC may decline or be unable to provide access to some or all of the Personal Information that we hold about you, where permitted or required by applicable law. For example, HDFSC may not disclose information relating to you if the Personal Information of other individuals is referenced or if there are legal, security or commercial proprietary restrictions. If we do not provide you with access, we will generally provide you with an explanation as to why.

## 10. Resolving Your Questions and Concerns

HDFSC has designated an individual who is responsible for compliance with this privacy policy. You may contact our Privacy Officer to:

- Access Personal Information about you that is held by HDFSC (subject to certain exceptions under applicable laws);
- Review, verify, correct or update your Personal Information;
- Ask any questions or raise any concerns about our privacy policy, the handling of your Personal Information, or our privacy or data protection practices;
- Obtain written information about HDFSC’s policies and practices relating to its Affiliates and service providers outside of Canada;
- Withdraw your consent to the continued collection, use or disclosure of your Personal Information; and/or
- Request a copy of the most up-to-date version of this privacy policy.

You may refuse or withdraw your consent to the collection, use and disclosure of your Personal Information at any time except when that Personal Information has been collected and is required to service your account with HDFSC or Affiliate for the product and service provided to you. If you do withdraw consent, HDFSC may not be able to provide to you or continue to provide you with some products, services or information, which may be of value to you. You may also, at any time, withdraw your consent for HDFSC to share your Personal Information with HDFSC’s Affiliates or third parties including the independent Harley-Davidson dealerships or other third parties who provide Harley-Davidson branded products or services (insurance, visa card, etc.), however if your consent is withdrawn they may not be able to provide the services and or products you have requested.

To withdraw your consent:	Email the Privacy Officer:	<a href="mailto:PrivacyOfficer@HDFSI.com">PrivacyOfficer@HDFSI.com</a>
	Call Rider Services:	1-866-816-5820
Privacy questions or concerns?	Email the Privacy Officer:	<a href="mailto:PrivacyOfficer@HDFSI.com">PrivacyOfficer@HDFSI.com</a>
	Mail questions or concerns:	Harley-Davidson Financial Services, Attention: Privacy Officer, P.O. Box 21489 Carson City, Nevada 89721-1489

Emails and letters should include your name, address, email or phone number to ensure that we can promptly identify you and respond to your request.

## 11. Changes to this Policy

This privacy policy was last updated in June 2020.

We may need to change this privacy policy from time to time. When we do, we will post the updated privacy policy on our website at <https://creditapplication.harley-davidson.com/ca/en/privacy> and will revise the “last updated” date appearing above. We will also mail a copy of the updated Privacy Policy to you via mail or email if you have agreed to receive electronic mail, or where otherwise permitted by applicable law.

When we are able to do so, we will generally notify affected individuals of material changes to this privacy policy which involve new or revised uses or disclosure of their Personal Information that may not be reasonably expected by them at the time that they provide us with their Personal Information.

However, we encourage you to review our privacy policy from time to time in order to check for updates and refresh your understanding of our Personal Information handling policies and practices. By providing us with your Personal Information, you acknowledge and agree that it is your responsibility to review this privacy policy periodically and become aware of any modifications.