

PRIVACY CODE

**ING DIRECT
111 GORDON BAKER ROAD
9TH FLOOR
TORONTO, ONTARIO
M2H 3R1**

A word about your privacy.

We respect your privacy. Not only do we respect it, but we also protect it. The private information you share with us stays with us. We do, however, provide or collect your information as is required by legislation to those to whom you have authorized us to release information. They include the financial institutions you've asked us to deal with, and specialized service providers (like the people who print our account statements). All of the above must meet our rigorous privacy standards. We've provided this booklet for your interest and information. This policy does have a legal tone that reflects both the importance of the issue and it is consistent with federal legislation. If you want more information regarding our privacy principles, please read on. If you have privacy questions or concerns, please contact one of our Direct Associates at 1-800-464-3473. You can also contact our Privacy Officer via e-mail at theprivacyofficer@ingdirect.ca or by mail at 111 Gordon Baker Road, Suite 900, Toronto, Ontario M2H 3R1 or by telephone at (416) 497-6293 or toll free (866) 677-0546.

Introduction

ING Bank of Canada ("ING DIRECT") is committed to keeping personal information accurate, confidential, secure and private. The ING DIRECT Privacy Code is an embodiment of this commitment.

This Privacy Code is based on the Personal Information Protection and Electronic Documents Act (PIPEDA), the Canadian Bankers Association (CBA) Model Privacy Code and on the Canadian Standards Association (CSA) Model Code for the Protection of Personal Information (CAN/CSA-Q830-96). It describes how ING DIRECT subscribes to the principles of the PIPEDA, CBA and CSA Model Codes. A copy of the PIPEDA is available at www.privcom.gc.ca. Copies of the CBA and CSA Model Codes are available on request from the Canadian Bankers Association at 1-800-263-0231.

The Scope Of This Privacy Code

This Privacy Code describes the principles ING DIRECT will use to protect the privacy of personal information in its possession or control.

This Privacy Code does not apply to information about business customers who carry on business as corporations, partnerships or in other forms of association. ING DIRECT does, however, protect the confidentiality of such information in accordance with the law and ING DIRECT's own policies. This Privacy Code does apply to personal information of individual owners of sole proprietorships.

Changes To This Privacy Code

In order to ensure that this Privacy Code is kept up to date, we reserve the right to change this Privacy Code from time to time. Any changes will be effective 30 days following ING DIRECT providing you with notice. Notice of changes to the Privacy Code may be distributed through ING DIRECT statements, newsletters and/or posted on the ING DIRECT web site. If you access or choose to continue to be serviced by ING DIRECT after the effective date of the change, you automatically accept the change.

Definition Of Terms Used In This Privacy Code

Direct Associates

The client services representatives at ING DIRECT to whom the public is encouraged to address their initial questions and concerns about an ING DIRECT product or service. Direct Associates may be reached by telephone at: 1-800-464-3473 or e-mail at: clientservices@ingdirect.ca.

direct marketing

Promotions targeted to individuals whose personal information indicates that a certain product may be of interest to them. This includes mail, e-mail and telemarketing initiatives. This does not include statements, statement inserts, and messages in banking machines, bank machine receipts, and announcements in electronic bulletin boards, through personal bankers or customer relationship management.

Independent Mortgage Broker

The individual and/or company through which you have been referred to ING DIRECT under a referral arrangement between such Independent Mortgage Broker and ING DIRECT. The Independent Mortgage Broker is not an agent, employee, partner or joint venturer of ING DIRECT.

ING DIRECT

"ING DIRECT" is the operating name of ING Bank of Canada.

personal information

Information about an identifiable individual, but does not include the name, title or business address or business telephone number of an employee of an organization.

Privacy Office

The department at ING DIRECT that is responsible for ensuring the protection of individuals' personal information. The Privacy Office may be contacted by mail at:

PRIVACY OFFICE
ING DIRECT
111 Gordon Baker Road
Toronto, Ontario M2H 3R1
theprivacyofficer@ingdirect.ca
(416) 497-6293 or toll free 1(866) 677-0546

The Ten Principles of Privacy in Summary

These ten principles of privacy are interrelated and must be read in conjunction with the accompanying commentary.

1. ING DIRECT's Accountability

ING DIRECT is accountable for all personal information in its possession or control, including any personal information transferred to third parties for processing. ING DIRECT has established policies and procedures to comply with this Privacy Code, and has designated one or more persons accountable for compliance.

2. Identifying The Purposes Of Collecting Personal Information

ING DIRECT will inform individuals of the purpose for which personal information will be used before or when they consent to its collection.

3. Obtaining Consent

ING DIRECT will obtain consent before or when it collects, uses or discloses personal information about an individual.

An individual can provide consent to the collection, use and disclosure of personal information about them expressly, implicitly, or through an authorized representative. An individual can withdraw consent at any time, with certain exceptions.

ING DIRECT will collect, use or disclose personal information without an individual's consent only in limited circumstances as permitted by law.

4. Limits For Collecting Personal Information

ING DIRECT limits the amount and type of personal information it collects. ING DIRECT will collect personal information only for the identified purposes or as otherwise permitted by law.

5. Limits For Using, Disclosing And Keeping Personal Information

ING DIRECT will use or disclose personal information only for the reasons it was collected, unless an individual gives consent to use or disclose it for another reason.

Under certain circumstances, ING DIRECT may have a legal duty or right to disclose personal information without consent.

ING DIRECT will keep personal information only as long as necessary for the identified purposes.

6. Keeping Personal Information Accurate

ING DIRECT will keep the personal information in its possession or control accurate, complete, current and relevant, based on the most recent information available to ING DIRECT.

Individuals may challenge the accuracy and completeness of personal information about them and have it amended as appropriate.

7. Safeguarding Personal Information

ING DIRECT protects personal information with safeguards appropriate to the sensitivity of the information.

8. Making Information About Policies And Procedures Available

ING DIRECT will be open about the procedures used to manage personal information. Individuals will have access to information about these procedures through this Privacy Code, by contacting our Direct Associates or by contacting the Privacy Office. The information will be available in a format that is easy to understand.

9. Providing Access To Personal Information

When an individual requests it, when possible, ING DIRECT will advise the individual what personal information ING DIRECT has in its possession or control about the individual, what it is being used for, and to whom it has been disclosed.

When an individual requests it, ING DIRECT will give an individual access to personal information about them which is in the possession or control of ING DIRECT. In certain situations, however, ING DIRECT may not be able to give individuals access to all of their personal information.

10. Handling Complaints And Questions

Individuals may challenge ING DIRECT's compliance with this Privacy Code. Complaints and inquiries should be directed to our Direct Associates or sent to the Privacy Office.

Principle 1

ING DIRECT'S Accountability

ING DIRECT is accountable for all personal information in its possession or control, including any personal information transferred to third parties for processing. ING DIRECT has established procedures to comply with this Privacy Code, and has designated one or more persons to be accountable for compliance.

- 1.1 Senior management of ING DIRECT will have ultimate accountability for protecting personal information. Senior management has delegated the day-to-day management of procedures involving personal information protection to one or more persons.
- 1.2 ING DIRECT's Privacy Office is responsible for overall personal information protection and ING DIRECT's compliance with this Privacy Code. In addition, Direct Associates are able to respond to most inquiries about the protection of personal information.
- 1.3 ING DIRECT will allow the following categories of ING DIRECT employees to access individuals' personal information in ING DIRECT's control:
 - Sales and Service Personnel;
 - Marketing Personnel;
 - Security Personnel;
 - Audit Personnel;
 - IT Personnel;
 - Operations Personnel;
 - Legal and Compliance Personnel;
 - Risk Management Personnel; and
 - Credit and Lending Personnel.
- 1.4 ING DIRECT is also accountable for personal information that has been transferred to a third party for processing. ING DIRECT's policies for safeguarding personal information transferred to third parties are set out in sections 7.4 and 7.5 of this Privacy Code.
- 1.5 To practice the principles of this Privacy Code, ING DIRECT:
 - has established procedures to protect the privacy of personal information;
 - has established procedures to receive and respond to questions and complaints;
 - gives the public access to this Privacy Code; and
 - has trained ING DIRECT staff to understand and follow ING DIRECT's procedures.

ING DIRECT also oversees compliance with this Privacy Code through regular audits and other compliance procedures. Senior management reports to a committee of its Board of Directors regarding compliance with this Privacy Code.

Principle 2

Identifying The Purposes of Collecting Personal Information

ING DIRECT will identify the purposes of collecting personal information, before or when consent is provided.

- 2.1 Except as noted below, when an individual applies for a product or service, ING DIRECT will make the individual aware of the purposes for which ING DIRECT is requesting the personal information. If ING DIRECT identifies other purposes for which the personal information may be used, ING DIRECT will seek the individual's consent prior to starting these uses. ING DIRECT will advise that it is the individual's right to refuse permission for ING DIRECT to use personal information for any new purposes.

In some cases ING DIRECT will not explain those purposes or obtain the individual's consent. (See section 3.4 and section 5.1 for details).

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- 2.2 ING DIRECT will clearly identify the purposes for which it is collecting personal information in writing, verbally (either in person or over the telephone), or by any other means it communicates with individuals.
- 2.3 Individuals can ask for information about the purposes for which ING DIRECT collects personal information when they phone or visit ING DIRECT, or write to the Privacy Office.
- 2.4 Unless additional purposes are identified to an individual before or at the time of collection, ING DIRECT will collect personal information (which may include credit, employment and other financially related information) for the following purposes:
- to help identify new clients and/or guarantors;
 - to determine the suitability of products or services for an individual or the eligibility of an individual for products and services;
 - to set up and manage products and services that meet an individual's needs;
 - to offer products and services to meet those needs;
 - to provide ongoing service; and
 - to meet legal and regulatory requirements, such as requirements under the Income Tax Act and credit reporting requirements.
- 2.5 ING DIRECT takes care to explain purposes which are not as obvious as others. The purposes for collecting a name or address are obvious and do not need to be explained, but the purpose for collecting, using and disclosing other personal information may not be as self-evident.

ING DIRECT may collect, disclose and use personal information for some or all of the following purposes:

- references are used to verify information on an application;
- an individual's date of birth ("DOB") and other identifying information may be collected and used to verify the identity of a client and to protect the client and ING DIRECT from error or fraud. ING DIRECT may also collect and use personal information obtained from credit bureaus, credit reporting agencies, credit or mortgage insurers and other financial institutions in order to help verify a new client's identity;
- a Social Insurance Number ("SIN") is collected and used because the Income Tax Act requires it for an individual's income tax reporting. In addition, a SIN may be used to match credit bureau information to help verify the identity of a client;
- personal information is exchanged with credit bureaus, credit reporting agencies, credit insurers, and other financial institutions, to maintain the integrity of the credit-granting process and to determine eligibility for financial products. In certain cases, individuals have a right to access their personal information in the control of these institutions. Individuals may contact our Direct Associates or the Privacy Office to find out how to access their personal information in the control of these institutions;
- personal information is used by ING DIRECT to determine initial and ongoing eligibility for financial products and to notify the clients of such products by website, mail, e-mail or phone;
- personal information including account details may be collected from or disclosed to an individual's Independent Mortgage Broker to allow account administration by the Independent Mortgage Broker;
- Subject to 7.4, personal information may be disclosed to investors or potential investors, lenders and government guarantors in order for us to process and fund your mortgage;
- personal information may be collected, used and disclosed to investigate specific transactions or patterns of transactions for the purpose of detecting unauthorized or illegal activities;
- personal information may be collected and used to ensure that a client's instructions can be properly verified;
- personal information may be collected, used and disclosed to investigate client complaints;
- should you open an account to be operated on behalf of a third party, personal information of that third party will be collected from you in accordance with money laundering legislation; and
- personal information may be used by ING DIRECT and disclosed to affiliates to satisfy regulatory reporting requirements and international banking standards.

Principle 3 Obtaining Consent

ING DIRECT will obtain consent before or when it collects, uses or discloses personal information about an individual. An individual can provide consent to the collection, use and disclosure of personal information about them expressly, implicitly or through an authorized representative.

ING DIRECT will collect, use or disclose personal information without an individual's consent only in limited circumstances as permitted by law.

Subject to certain legal and contractual restrictions and reasonable notice, an individual can refuse or withdraw their consent to the collection, use or disclosure of personal information about them at any time.

- 3.1 ING DIRECT will obtain consent before or when it collects, uses or discloses personal information. Generally, ING DIRECT will seek consent to use and disclose personal information at the same time it collects the information. In some circumstances, ING DIRECT may identify a new purpose and seek consent to use and disclose personal information after it has been collected.
- 3.2 ING DIRECT will explain to individuals in plain language how personal information will be used or disclosed before they give their consent.
- 3.3 Consent to the collection, use and disclosure of personal information can be expressed, implied, or given through an authorized representative of the individual.
 - Individuals can express consent verbally, such as when information is collected over the telephone, in writing, such as when completing and signing an application, or electronically, such as when applying on a computer.
 - Individuals can imply their consent, for example, by using an ING DIRECT product or service. In such a case, ING DIRECT may assume that the individual consents to the use of the personal information for the purpose of using an ING DIRECT product or service.
 - By applying for an ING DIRECT product through an Independent Mortgage Broker, individuals consent to the disclosure of his or her account information and other related personal information to the Independent Mortgage Broker(s) by ING DIRECT.
 - Individuals can also give consent through an authorized representative, such as a legal guardian or a person with a power of attorney. This may be necessary, for example, if ING DIRECT cannot obtain express consent from an individual who is a minor, seriously ill, or mentally incapacitated. Authorized representatives may also include an individual's Independent Mortgage Broker.
- 3.4 ING DIRECT may collect, use or disclose personal information without the individual's knowledge and consent only in limited circumstances as permitted by law.
 - ING DIRECT may collect, use and disclose personal information without the individual's knowledge or consent if it is clearly in the individual's best interests to do so and consent can not be sought in a timely manner. An example of such a circumstance is when an individual is seriously ill.
 - ING DIRECT may collect, use and disclose personal information without individuals' knowledge or consent in certain circumstances where the information is publicly available. An example would be the name, address and phone number of a subscriber to a telephone directory that is available to the public where the subscriber can refuse to have their personal information appear in the telephone directory.
- 3.5 Subject to certain legal or contractual restrictions and reasonable notice, an individual may refuse or withdraw consent at any time.
 - ING DIRECT will inform individuals of the consequences of refusing or withdrawing consent when individuals seek to do so. Refusing or withdrawing consent for ING DIRECT to collect, use or disclose personal information could mean that ING DIRECT cannot provide the individual with a product, service or information of value to the individual.

For example, if an individual does not allow ING DIRECT to obtain a credit history report, ING DIRECT may not be able to lend money to the individual due to prudent lending practices, or other regulations.

ING DIRECT, however, will not unreasonably withhold products, services or information from individuals who refuse to give consent or who withdraw consent.

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- ING DIRECT is required by law to collect certain types of personal information in order to verify the identity of its clients. If an individual does not allow ING DIRECT to collect and use this information for this purpose, or if the client later attempts to withdraw their consent, ING DIRECT may not be able to open an account or maintain the account on behalf of that client.
 - Withdrawal of consent is not permitted in relation to a credit product where ING DIRECT must collect and report information after credit has been granted. This is to maintain the integrity of the credit system.
 - ING DIRECT will not deny credit to an individual solely because the individual does not provide a SIN for this purpose, but ING DIRECT may be unable to open a savings account or sell an individual a GIC or other interest-bearing instrument unless a SIN is provided.

Principle 4

Limits On The Collection Of Personal Information

ING DIRECT limits the amount and type of personal information it collects. ING DIRECT will collect personal information only for purposes it has already identified to the individual or as permitted by law. ING DIRECT will collect personal information using procedures which are fair and lawful.

- 4.1 ING DIRECT will collect only the amount and type of information needed for the purposes documented by ING DIRECT and identified to the individual.
- 4.2 ING DIRECT will collect personal information about an individual primarily from that individual. Except as permitted by law, ING DIRECT will only collect personal information from external sources if individuals have consented to such collection.

Principle 5

Limits On Using, Disclosing And Keeping Personal Information

ING DIRECT will use or disclose personal information only for the purposes for which it was collected, unless consent is given to use or disclose it for another purpose.

Under certain exceptional circumstances, ING DIRECT may have a legal duty or right to disclose personal information without the individual's knowledge or consent.

ING DIRECT will keep personal information only as long as necessary for the identified purposes.

- 5.1 ING DIRECT may disclose personal information without consent when required or permitted by law. Examples of such disclosure include:
 - Subpoenas, search warrants and other court and government orders;
 - debt collection or demands from other parties who have a legal right to personal information; and
 - disclosure of personal information to a lawyer (or, in Quebec, a notary or an advocate) who represents ING DIRECT.
- 5.2 In any of the circumstances referred to in Principle 5.1, ING DIRECT will protect the interests of its clients by making sure that:
 - orders or demands appear to comply with the laws under which they were issued, and
 - ING DIRECT does not comply with casual requests for personal information from government or law enforcement authorities.

ING DIRECT may notify individuals that an order or demand has been received, if the law does not prohibit such notification. ING DIRECT may notify individuals by telephone, or by letter to the client's usual address.

5.3 ING DIRECT may want to use personal information in its possession or control to market products and services to individuals, either directly through ING DIRECT or through its existing subsidiaries, affiliates or approved network of Independent Mortgage Brokers. ING DIRECT will obtain the individual's consent before using or disclosing personal information for this purpose.

When an individual applies for a product or service and provides personal information, ING DIRECT will advise the individual that his/her personal information may be used by ING DIRECT to market other products and services to the individual.

5.4 ING DIRECT will collect health records only for the specific purposes explained to clients. Subject to anything herein, it will not disclose health records to subsidiaries or affiliates, and vice versa. For example, ING DIRECT will not use an individual's health records collected by a subsidiary to help assess a loan application.

5.5 If personal information has been used to make a decision about an individual, this information will also be attainable. ING DIRECT will keep the personal information long enough for the individual to have access to it after the decision has been made.

5.6 ING DIRECT will destroy, delete or make anonymous any personal information no longer needed for its identified purposes or for legal requirements.

Principle 6 Keeping Personal Information Accurate

ING DIRECT will keep the personal information in its possession or control accurate, complete, current and relevant, based on the most recent information available to ING DIRECT.

Individuals may challenge the accuracy and completeness of personal information about them and have it amended as appropriate.

6.1 ING DIRECT will make reasonable efforts to minimize the possibility of using inaccurate, incomplete or outdated personal information to make a decision about the individual.

6.2 ING DIRECT will update personal information only if it is necessary for the purposes for which it was collected.

6.3 ING DIRECT will make reasonable efforts to keep personal information in its possession and control accurate and current if the information is used on an ongoing basis, unless limits on the need for accuracy are clearly set out by ING DIRECT.

6.4 ING DIRECT will also rely on individuals to keep certain personal information relating to them accurate, complete and current. If an individual demonstrates to ING DIRECT that personal information relating to them is inaccurate, incomplete, out of date or irrelevant, ING DIRECT will revise or delete the personal information. If necessary, ING DIRECT will disclose the revised personal information to any third parties to whom ING DIRECT disclosed wrong or outdated information in order to permit them to revise their records.

6.5 If ING DIRECT does not agree to revise personal information as requested by the individual, the individual may challenge ING DIRECT's decision. ING DIRECT will make a record of this challenge, and, if necessary, disclose the challenge by the individual to any third parties to whom ING DIRECT has disclosed the personal information.

Principle 7 Safeguarding Personal Information

ING DIRECT will protect personal information with safeguards appropriate to the sensitivity of the information.

7.1 ING DIRECT will safeguard personal information in its possession or control from loss or theft and from unauthorized access, disclosure, duplication, use or modification.

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- 7.2 The safeguards employed by ING DIRECT to protect personal information will vary depending on the sensitivity, amount, distribution, format and storage of the personal information. ING DIRECT stores most of your information electronically. Recent paper records containing individuals' personal information are stored in files kept onsite at our Toronto head office, and older records containing individuals' personal information may be stored at an offsite storage facility. ING DIRECT will give the highest level of protection to the most sensitive personal information.
- 7.3 ING DIRECT will safeguard personal information in its possession or control through security measures. For example:
- physical security, such as secure locks on filing cabinets and restricted access to offices;
 - organizational security, such as controlled entry in data centres and limited access to relevant information; and
 - electronic security, such as passwords, personal identification numbers and encryption.
- 7.4 ING DIRECT may transfer personal information to third parties for processing, including printing cheques, market research, data processing services, collection, government guarantors, service agents, and for other goods and services. ING DIRECT will require these third parties to safeguard all personal information in a way that is consistent with ING DIRECT's measures and/or as regulated by law.

When ING DIRECT contracts with third parties, they are given only the information necessary to perform the services as set out in the contract. The third parties are prohibited from storing, analyzing or using the personal information transferred by ING DIRECT for any other purpose. The third parties are required to protect personal information transferred by ING DIRECT in a manner that is consistent with privacy policies and practices established by ING DIRECT.

- 7.5 ING DIRECT may disclose personal information to businesses such as credit bureaus, credit insurers and lenders with the individual's consent. ING DIRECT relies on the added protection of credit reporting legislation to ensure that credit bureaus protect personal information which is disclosed to them.
- 7.6 ING DIRECT will use care when disposing of or destroying personal information in order to prevent unauthorized access to the information.

Principle 8

Making Information About Policies And Procedures Available To Individuals

ING DIRECT will be open about the procedures used to manage personal information. Individuals will have access to information about these procedures through ING DIRECT's Privacy Code, by contacting our Direct Associates or by writing to the Privacy Office. The information will be available in a format that is easy to understand.

- 8.1 ING DIRECT will make this Privacy Code available to the public.
- Paper copies of this Privacy Code will be mailed to all new clients; and
 - An electronic version of this Privacy Code is available on ING DIRECT's website at www.ingdirect.ca.
- 8.2 Information about this Privacy Code will be available in a format that is easy to understand.
- ING DIRECT has produced a summary of this Privacy Code. The summary is available at www.ingdirect.ca and at the beginning of this document.
 - The contact information of the Direct Associates and the Privacy Office are provided in the summary as in this Privacy Code, so individuals know where to address complaints and questions about ING DIRECT's personal information policies and procedures.
- 8.3 ING DIRECT may make information about its procedures available in a variety of ways, depending on the nature of the services individuals are using and the sensitivity of the personal information.
- ING DIRECT may make brochures available on premises, mail, or e-mail information to its clients, establish a toll-free telephone service or provide on-line access.

Principle 9

Access To Personal Information

When an individual requests it, ING DIRECT will advise what personal information ING DIRECT has in its possession or control about the individual, what it is being used for and to whom it has been disclosed.

When an individual requests it, ING DIRECT will give the individual access to personal information about them which is in the possession or control of ING DIRECT. In certain exceptional situations ING DIRECT may not be able to give individuals access to all of the personal information about them.

- 9.1 An individual has the right to know and access, on request, what personal information about the individual ING DIRECT has in its possession or control, the right to access that personal information and to know to which third parties ING DIRECT has disclosed that information. Individuals may direct their requests by telephone to the Direct Associates or, in writing, to the Privacy Office.
- 9.2 ING DIRECT has established procedures for responding to requests for access to personal information. ING DIRECT will respond to requests within a reasonable time. Individuals must be specific about the personal information that may be in ING DIRECT's possession or control. In the unlikely event that ING DIRECT determines that there will be a cost to the individual in granting such access, ING DIRECT shall inform the individual of the costs permitted by law prior to granting such access.
- 9.3 ING DIRECT will identify from whom it collected the personal information, to whom it has disclosed the personal information, and how and when the information was disclosed. ING DIRECT will take this data from its records, and will provide it to the individual.
- 9.4 In some cases, ING DIRECT may not provide access to personal information that is in its possession or control. This may occur when:
 - providing access to personal information would be likely to reveal personal information about a third party;
 - providing the personal information could result in a threat to the security of another individual;
 - disclosing the information would reveal confidential commercial information;
 - the personal information is protected by solicitor-client privilege;
 - the information is the result of arbitration or other formal dispute resolution process; or
 - the information has been collected for the purposes of a legal investigation.
- 9.5 ING DIRECT will not record in individual files when personal information was disclosed to third parties for routine purposes. For example:
 - reporting to Revenue Canada (T5 and other reports);
 - regular updating of credit information to credit bureaus; or
 - indicating to third parties when cheques are returned for NSF (not sufficient funds).
- 9.6 If ING DIRECT denies the individual's request for access to personal information, ING DIRECT will advise the individual of the reason for the refusal. The individual may then appeal ING DIRECT's decision to the Privacy Commissioner of Canada.

Principle 10

Handling Individuals' Complaints And Questions

Individuals may challenge ING DIRECT's compliance with this Privacy Code. ING DIRECT will have policies and procedures to receive, investigate, and respond to individuals' complaints and questions.

- 10.1 ING DIRECT has policies and procedures to receive, investigate, and respond to individuals' complaints and questions relating to privacy. Individuals are advised to direct their complaints and questions by telephone to the Direct Associates or in writing to the Privacy Office.

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- 10.2 ING DIRECT will investigate all complaints. If it finds a complaint justified, ING DIRECT will attempt to resolve it. If necessary, ING DIRECT will modify its policies and procedures to ensure that other individuals will not experience the same problem.
- 10.3 If individuals are not satisfied with the way ING DIRECT has responded to their complaint, they can contact the Office of the Superintendent of Financial Institutions, the Ombudsman for Banking Services and Investments or the Federal Privacy Commissioner.