

## **Privacy Statement**

In the group insurance and retirement plan business, we collect highly-sensitive personal information concerning our clients' health, lifestyles and finances. As the success of our business depends upon obtaining and maintaining the trust of our clients, they must be assured that the personal information they provide to us will be maintained in the strictest confidence.

This document therefore sets out the policy of PWI Insurance Services (Agency) Ltd. in respect of the protection of the personal privacy of our clients, and their employees.

Personal information is defined as information concerning an identifiable individual. This includes, but is not limited to, all information concerning lives insured, beneficiaries, and employees, particularly information concerning their health, finances and lifestyle. The information may be in any form, including correspondence, memoranda, electronic communications, video or audio recordings, photographs or any other documentary material, regardless of its physical form or characteristics.

Personal information does not include the name, title or business address, telephone number or email address of employees.

### **1. Accountability**

PWI Insurance Services is responsible for personal information in its possession or control, including information that has been transferred to a third party for processing.

All employees are obligated to protect the personal privacy of lives insured, beneficiaries, and their fellow employees with regard to any and all personal information obtained by PWI Insurance Services. They are required to follow the letter and spirit of this policy, as well as any specific procedures set out for the area in which they work.

Staff will be adequately trained and provided with information about the privacy laws which affect the company, and the company's policies and procedures.

### **2. Identifying Purposes**

The purposes for which the personal information is collected will be identified at or before the time the information is collected. This will generally be done through application or claim forms.

PWI Insurance Services will not collect, use, or disclose information beyond that required to fulfill the specified purposes.

When personal information that has been collected is to be used for a purpose not previously identified, the new purpose will be identified prior to use. Unless the new purpose is required in order to investigate a potential breach of contract, the prevention or detection of fraud, or for law enforcement purposes, the consent of

the individual is required before information can be used for that purpose.

Persons collecting personal information must be able to explain to individuals the purposes for which the information is being collected.

### **3. Consent**

The knowledge and consent of the individual is required for the collection of personal information and the subsequent use or disclosure of this information. Typically, PWI Insurance Services will seek consent for the use or disclosure of the information at the time of collecting through the use of application or claim forms. In certain circumstances, consent with respect to use or disclosure may be sought after the information has been collected but before use (for example, when PWI Insurance Services wants to use information for a purpose not previously identified).

The way in which PWI Insurance Services seeks consent may vary, depending on the circumstances and the type of information collected. PWI Insurance Services should generally seek express consent when the information is likely to be considered sensitive. Implied consent would generally be appropriate when the information is less sensitive. Consent can also be given by an authorized representative (such as a legal guardian or a person having power of attorney), although the authority of such a representative may be restricted by law.

In certain circumstances, personal information can be collected, used, or disclosed without the knowledge and consent of the individual. For example, legal, medical, or security reasons may make it impossible or impractical to seek consent. When information is being collected for the investigation of a potential breach of contract, the prevention or detection of fraud, or for law enforcement purposes, seeking the consent of the individual might defeat the purpose of collecting the information. Similarly, seeking consent may be impossible or inappropriate when the individual is a minor, seriously ill, or otherwise incapacitated.

An individual may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. PWI Insurance Services will inform the individual of the implications of such withdrawal, which may include the termination of the group policy, or the inability to process a claim.

### **4. Limiting Collection**

The collection of personal information will be limited to that which is reasonably necessary for the purposes identified by PWI Insurance Services. Information shall be collected only by fair and lawful means.

PWI Insurance Services shall not collect personal information indiscriminately. Both the amount and the type of information collected shall be limited to that which is necessary to fulfill the purposes identified.

## **5. Limiting Use, Disclosure, and Retention**

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes, and shall be destroyed in accordance with PWI Insurance Services' Record Retention Policy.

It should be noted that PWI Insurance Services will not sell any client lists under any circumstances.

## **6. Accuracy**

Personal information will be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used and to minimize the possibility that inappropriate information may be used to make a decision about the individual.

PWI Insurance Services will not routinely update personal information, unless such a process is necessary to fulfill the purposes for which the information was collected.

## **7. Safeguards**

Personal information will be protected by security safeguards appropriate to the sensitivity of the information. As PWI Insurance Services deals with highly-sensitive information concerning the health and finances of our clients, this is of paramount importance.

The security safeguards will protect personal information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification.

The methods of protection will include:

1. physical measures (e.g. building access cards for employees, off-site back-ups, archiving);
2. organizational measures (e.g. security clearances and limiting access on a "need-to-know" basis); and
3. technological measures (e.g. the use of passwords).

## **8. Openness**

PWI Insurance Services will make readily available to individuals specific information about its policies and practices relating to the management of personal information.

The information made available shall include:

1. the name or title, and the address, of those accountable for PWI Insurance Services' policies and practices and to whom complaints or inquiries can be forwarded;
2. the means of gaining access to personal information held by PWI Insurance Services;

3. a description of the type of personal information held by PWI Insurance Services, including a general account of its use;
4. a copy of this policy; and
5. what personal information is made available to related organizations.

## **9. Individual Access**

Upon request, an individual will be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual will be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

In certain situations, PWI Insurance Services may not be able to provide access to all the personal information it holds about an individual. Exceptions to the access requirement will be limited and specific, and the reasons for denying access will be provided to the individual upon request. Exceptions may include information that is prohibitively costly to provide, information that contains references to other individuals, information that cannot be disclosed for legal, security, or commercial proprietary reasons, information that has been obtained in the course of an investigation of a potential breach of a contract or fraud, and information that is subject to solicitor-client or litigation privilege.

The requested information will be provided or made available in a form that is generally understandable. For example, when abbreviations or codes are used, an explanation will be provided upon request.

When an individual successfully demonstrates the inaccuracy or incompleteness of personal information, PWI Insurance Services will amend the information as required.

When a challenge is not resolved to the satisfaction of the individual, the individual will be entitled to place in PWI Insurance Services' file a statement as to their position and documentation to support that position.

## **10. Challenging Compliance**

An individual may address a challenge concerning compliance with this policy to PWI Insurance Services' Compliance Officer.

If a complaint is found to be justified, PWI Insurance Services will take appropriate measures, including, if necessary, amending its policies and procedures.