



Knowing your business matters.

a Northbridge Financial company

Your Privacy is Our Concern

Federated Insurance Company of Canada¹ is committed to protecting your personal information, whether you are a customer of Federated or not, and, no matter how we came to be in possession of your information. Ten privacy principles guide us in how we collect, use, and share your personal information and how we are accountable to you where your personal information is concerned.

The Ten privacy principles and our commitment to them are as follows:

1. **Accountability:** *An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.*

Federated has designated our Chief Privacy Officer as the person who is accountable for ensuring personal information is used only for appropriate and approved purposes. Representatives from our various business units have worked together under the direction of this officer to plan and implement policies and procedures that ensure that we adhere to these ten principles.

2. **Identifying Purposes:** *The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.*

Federated will identify the purposes for collecting personal information at or before the time the information is collected.

3. **Consent:** *The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where inappropriate.*

Subject to specifically listed exceptions, Federated will only collect, use, or disclose personal information with the knowledge and consent of the individual.

4. **Limiting Collection:** *The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.*

¹ The principles and policies stated in this document also apply to information collected, used, and disclosed by our agency company, Contact+ Insurance Network Ltd., through which Federated offers Life and Accident & Sickness products.

Federated will only collect personal information that is necessary to fulfill purposes that are identified at the time the information is collected. When personal information is collected, it will be done in an open and non-deceptive manner that respects the expectations of the individual. Furthermore, any and all collection shall be done in accordance with all applicable legal requirements.

*5. **Limiting Use, Disclosure and Retention:** Personal information shall 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 shall be retained only as long as necessary for the fulfillment of those purposes.*

Federated will not use or disclose personal information for purposes other than those for which it was collected, except with consent or as required by law. Personal information will be retained as long as necessary for the fulfillment of those purposes and to satisfy legal and regulatory requirements. In certain limited circumstances, personal information may be archived and used and shared to fulfill ongoing purposes such as risk assessment and fraud prevention.

*6. **Accuracy of Information:** Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.*

Federated will ensure that personal information will be as accurate, complete and up-to-date as is necessary for use in fulfilling identified purposes. In some cases, archived information may be of use and will remain unaltered and retained indefinitely.

*7. **Safeguards:** Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.*

Personal information is protected by security safeguards appropriate to the sensitivity of the information. A Confidentiality Agreement governs conduct of each employee with respect to personal information, access to personal information is limited to that which is necessary to fulfill the identified purposes, and information systems are protected by industry recognized security safeguards.

*8. **Openness:** An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.*

Our policies and practices relating to the use and management of your personal information are readily available to the public both electronically on our website and in print upon request.

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

Upon receipt by the Chief Privacy Officer of a written request for access, an individual will be informed in writing of the extent of personal information that is in the control of

Federated, how it is used, and to whom it is disclosed. If requested, the individual will also be given access to that information and they can challenge the accuracy and completeness of the information and have it amended where necessary.

*10. **Challenging Compliance:** An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.*

All questions regarding our compliance with these ten principles will be directed to our Chief Compliance Officer who will undertake an investigation, recommend and implement any remedial measures that may be required, and respond to the individual with the results of the investigation.

These principles are developed more fully in our "Fair Information Practices Code of Conduct". Please see the contact information at the end of this document for additional details.

Collecting, Using and Disclosing Information About You

Respecting your personal privacy is as important to Federated as it is to you and therefore we only collect your personal information for purposes of, generally speaking, providing you with insurance and financial products and services. In order to do this, we use and share your personal information to:

- ◆ Establish and maintain communications with you
- ◆ Assess your insurability and underwrite risks on a prudent basis
- ◆ Price products and services to our mutual benefit
- ◆ Administer your insurance coverage
- ◆ Investigate, adjudicate, and settle claims
- ◆ Detect, deter, and prevent fraud
- ◆ Offer and provide products and services to meet your needs
- ◆ Compile statistics
- ◆ Act as otherwise required or authorized by law.

These are our "Identified Purposes". Federated takes a global view of the Identified Purposes in that we are not collecting personal information just for any one of the purposes, we are collecting the personal information for all of the Identified Purposes. For example, while you may expect that we will initially use your information for assessing your insurability and underwriting your policy, we also may use it for claims purposes and visa versa. If we have obtained your social insurance number, it is used and disclosed only for taxation purposes and for client identification as required by the Proceeds of Crime (Money Laundering) and Terrorist Financing Act.

We collect information about you both directly and indirectly. While you supply us with information on your application, we also collect necessary information from various sources such as other financial institutions, health care providers, governmental agencies, current and past employers, industry bodies such as the Insurance Bureau of Canada, and risk management solutions providers. Rest assured that collection of your personal information is limited to that which is required to fulfill our Identified Purposes.

The types of your personal information that we collect, use, and share will depend upon the nature of your relationship with us but may include:

- ◆ name, address, and telephone number
- ◆ e-mail address and fax number
- ◆ date and place of birth
- ◆ gender
- ◆ citizenship
- ◆ family and marital status
- ◆ lifestyle information
- ◆ occupation, place of employment, and Social Insurance Number (SIN)
- ◆ education
- ◆ medical and health records and information
- ◆ Financial information such as assets, liabilities, and income
- ◆ Credit information
- ◆ previous insurance experience including prior applications and claims history
- ◆ policy type and number
- ◆ driver's licence number and your driving record
- ◆ motor vehicle details including the vehicle identification number (VIN)
- ◆ Loss payees including mortgagees and lien holders
- ◆ Persons other than yourself who would be covered by your policy as Additional Named Insured and your relationship to them
- ◆ Credit card and banking information
- ◆ Membership affiliations

By providing Federated with these types of personal information, we consider that you do so with the knowledge and understanding that it is collected, used, and shared only for the Identified Purposes. We may also, in the course of assessing your application and providing you with products and services, share your information among with our subsidiaries, agents, affiliates, approved partners, reinsurers, rating agencies, and authorized administrators. Please also note that Personal information collected by Federated may be used or shared even if coverage is declined or ceases to be in force.

Your Approval

Given the nature of the insurance industry, consent to the collection, use, and sharing of your personal information may be implied in some circumstances but where possible we will obtain your written consent prior to dealing with your personal information. For example, we sometimes provide insurance or amendments to existing policies over the telephone, on short notice, or with little written documentation. In these circumstances it is impossible to obtain express written consent from you. Another example is that consent can also be given by one individual on behalf of another individual. For example, where an individual applies for auto insurance for themselves and their family, the applicant is giving consent for the collection, use, and disclosure of personal information both for themselves and their family members even though the family members are not present during the application process. By dealing with us on insurance related matters, we infer that we have your consent for the collection, use, and disclosure of all personal information necessary for the Identified Purposes.

You may withdraw your consent, subject to legal or contractual obligations and on reasonable notice, but this may limit our ability to provide you a product or service. In the event that you wish to withdraw your consent to the collection, use, or sharing of your personal information for any of the Identified Purposes, you should first contact our Privacy Office for information regarding the implications of such withdrawal, and then, if you choose to proceed, give the requisite notice.

Protecting Your Privacy

Your personal information is kept in strict confidence and we maintain physical, electronic and procedural safeguards to protect your information from unauthorized access. This includes reviewing our policies and practices, monitoring our computer networks, testing the strength of our security measures, and monitoring our compliance with relevant laws in order to help us ensure that your personal information is safe and secure. We restrict access to your personal information to those employees whom we have determined need to know that information to provide products or services to you. In addition, all our employees are bound by a Confidentiality Policy.

There are situations specific to the insurance industry where we will disclose personal information as dictated by prudent insurance practices. For example, as part of the risk assessment process, we may transfer personal information to other insurance companies including reinsurance companies which share in the risk. Additionally, personal information may be disclosed to industry accepted information services providers for the purposes of underwriting, claims management, classification, and rating. We may also disclose personal information to businesses that provide goods and services to insurance companies and their customers, such as claims adjusters, appraisers, and repair shops and we may disclose personal information to regulatory agencies as dictated by law. Only the information necessary for these services will be provided by us to these service providers, and it is done on the basis that they will maintain the confidentiality of the information. These organizations are also bound by the same legal requirements as Federated where your personal information is concerned.

Accessing Your Personal Information

You have the right to know what kind of information we keep about you, how we have dealt with that information, to receive copies of that information, and the additional right to have any errors corrected. To exercise these rights, contact our Privacy Office and we will respond to your request within 30 days of receipt of your request or advise you if additional time may be required. Please note, however, that there may be situations in which we are legally prohibited from responding to your request or may refuse your request because the nature of the information is commercially sensitive or involves Personal Information of another person. If this is the case, we will advise you why your request has been refused, subject to any legal restrictions. We may also charge you for providing access to personal information if the costs of providing access are otherwise prohibitive but we will only do so after first advising you of the approximate cost and you confirm that you nevertheless require access.

We will also amend personal information that is demonstrated to be inaccurate or incomplete and will make reasonable efforts to advise other parties to whom we have supplied your personal information of corrections that are needed. There is no charge for verifying or correcting information.

Further Information and Contact

You can obtain further information about our fair information practices from our Privacy Office (1 800 665 1934) or from our web site www.Federated.ca. You may also contact us at:

Privacy Office
Federated Insurance Company of Canada
Box 5800
Winnipeg, Manitoba
R3C 3C9

While we will make every effort to answer your questions and resolve any issues to your satisfaction, if you are not satisfied with the resolution of your inquiry or complaint you may challenge our decision by contacting the Privacy Commissioner of Canada at:

The Privacy Commissioner of Canada
112 Kent Street
Ottawa, Ontario
K1A 1H3

Toll-free 1-800-282-1376
Fax (613) 947-6850
info@privcom.gc.ca