



Privacy Policy

Our Privacy Pledge to You Combined Insurance Company of America

Your Privacy is Important to Us

Canada's national privacy legislation, the Personal Information Protection and Electronic Documents Act came into force on January 1, 2001. Since 2004, this privacy legislation applies to all businesses that collect, use or disclose Personal Information. Personal Information means information about you that can be used to identify you. Depending on the province you live in, you may have rights under similar provincial laws.

At Combined Insurance Company of America ("Combined Insurance"), we pledge to protect your privacy and safeguard your personal information. We have established ten Privacy Principles to govern our actions in collecting, using and disclosing our customers' Personal Information.

The ten Privacy Principles build upon earlier work by the Canadian Standards Association's Model Code for the Protection of Personal Information and the national privacy law.

Combined Insurance Company of America's 10 Privacy Principles

Principle 1 - Accountability

Combined Insurance accepts responsibility for maintaining and protecting Personal Information under its control. To meet this responsibility, Combined Insurance has appointed a Privacy Officer accountable to ensure we meet the ten Privacy Principles.

Principle 2 - Identifying Purposes

We will identify the purposes for which we collect Personal Information from customers before or as we collect the information.

Principle 3 - Consent

We ask for your consent to collect, use or disclose Personal Information except where required or permitted by law.

Principle 4 - Limiting Collection

We do not collect Personal Information from customers other than the information necessary for the purposes we identified.

Principle 5 - Limiting Use, Disclosure and Retention

We will only use or disclose your Personal Information for the purpose for which it was collected, unless you otherwise consent, or if it is required or permitted by law. We keep your Personal Information only for as long as we need to fulfill the purposes for which it was collected.

Principle 6 – Accuracy

We keep your Personal Information in as accurate, complete and up-to-date form as is needed to fulfill the purposes for which we use it.

Principle 7 - Safeguarding Information

We protect your Personal Information against loss or theft, and safeguard it from unauthorized access.

Principle 8 - Openness

Combined Insurance will make information on the management and handling of customers' Personal Information available to customers. This Policy is part of that commitment.

Principle 9 – Customer Access

If you ask us, we will tell you whether we have your Personal Information, and how we use it. We will also give you reasonable access to the information. If you can show it is inaccurate or incomplete, you will have the opportunity to correct or amend your Personal Information.

Principle 10 - Customer Complaints and Suggestions

Customers may direct any questions or inquiries about our privacy practices to Combined Insurance's Privacy Officer.

The following describes our Personal Information privacy practices and explains how we collect, use and disclose your Personal Information.

Types of Personal Information We Collect

At Combined Insurance, we collect and maintain information that refers specifically to you. The types of Personal Information we collect and maintain may include your:

- Name
- Mailing Address
- E-mail Address
- Personal and Business Telephone Numbers
- Social Insurance Number
- Date of Birth
- Names and Ages of Spouse and Children
- Beneficiary Information
- Occupation
- Employer

- Annual Income
- Other General Financial Information
- Health Information
- Other Insurance Coverage

How We Use Your Personal Information

You can trust that your Personal Information is collected and shared only as is necessary to provide you with the very best support, service and product options. We will only collect and use information about you for the following purposes:

- To understand your product and service needs
- To ensure that our products and services meet your needs
- To determine eligibility for our products or services
- To meet your ongoing service and product needs
- To administer products and services (investigate and adjudicate claims, generate billing statements, change coverages, etc.)
- For internal, external and regulatory audit purposes
- To fulfill our legal and regulatory responsibilities

We will obtain your consent before using your Personal Information for any other purpose.

Where We Get Your Personal Information

We get most of our information directly from you. Usually, the insurance application and other standard industry forms give us the information we need. We may also get information about you from telephone calls with you, or from letters, e-mail and other correspondence we have with you.

But sometimes, more information is necessary. For example, we may ask your doctor for more details about your medical history. We may also verify or obtain more information about you from a credit bureau.

Who Has Access to Your Information

We employ physical, electronic and procedural safeguards to protect your Personal Information. In addition, we restrict access to your Personal Information to those employees and agents who use your Personal Information to deal with the purposes to which you consented. For example, an Underwriter would need access to your Personal Information to evaluate your application; a Claims Adjuster to settle your claim; or a Representative to answer your questions, and offer you other types of coverage that may interest you.

Generally, Combined Insurance will not collect or disclose your Personal Information without your consent, unless required or permitted by law. Sometimes, we must disclose information about you to an insurance regulatory authority, a government agency, a law enforcement agency or, if a court orders us to, to another third party.

In the normal course of business, we may share some of your Personal information within our corporate family and with other service providers acting on our behalf to provide products or services to you. In these circumstances, we only disclose information that is necessary for such service providers to perform their services. Our service providers are required to protect any information given to them in a manner that is consistent with our privacy policies and security practices.

Some of these operations may result in Personal Information collected by Combined Insurance being stored or processed outside of Canada. In the event that our service provider is located in a foreign jurisdiction, they are bound by the laws of the jurisdiction in which they are located and may disclose Personal Information in accordance with those laws.

Various industry and professional organizations may also ask us for aggregated customer information in order to conduct research studies. These studies assess conditions or trends in the market and never identify individuals.

We will not obtain additional consent before providing your Personal Information in any of these circumstances. But, if we do provide your information to any party outside of Combined Insurance, we will record each time that a disclosure is made, including the relevant facts disclosed. As far as possible, we will require anyone who receives your Personal Information to meet the same privacy standards we do.

Accuracy of Your Personal Information

We will try to keep your Personal Information accurate, up-to-date and complete. However, circumstances may require a change to your information. If you need to update or correct your Personal Information that we have on file, simply contact us at the telephone number provided below.

Access to Your Personal Information

To access and verify any of your Personal Information, simply call us at 1-888-234-4466. In most cases, your Personal Information will be provided promptly upon request and free of charge. We will provide in-depth Personal Information, which requires work for us to assemble, within 30 days of your request. We may charge you for the cost of providing such information.

Withdrawal of Consent

To withdraw your consent at any time, simply call us at 1-888-234-4466. You can refuse to consent to our collection, use or disclosure of your Personal Information. You can withdraw your consent to our continued collection, use or disclosure. We may require you to complete a form documenting your request.

Refusing or withdrawing consent is subject to applicable legal and contractual requirements. Withdrawing consent does not apply to Personal Information used in policy issuance or renewal, insurance underwriting or claims administration of your current policies. It may also affect our ability to provide services to you. Federal and

provincial laws may require us to collect and report Personal Information to government agencies and we will continue to do so.

If You Have Questions or Concerns

We hope that our Privacy Policy reassures you that Combined Insurance is committed to protecting your privacy and safeguarding your Personal Information. If you have any questions about these principles or would like to obtain further information about our privacy policies and practices, please call us toll free at:

1-888-234-4466

If you prefer to contact us in writing or do not wish to be made aware of new Combined Insurance programs and services, please write to us at:

Combined Insurance Company of America

Attention: Privacy Officer

300-7300 Warden Avenue

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