PBL Insurance Limited (PBL) Privacy Policy

PBL is a brokerage guided by principals of providing excellent service, fostering mutually profitable working relationships and achieving operational excellence. To achieve these goals, PBL respects your right to privacy and takes seriously the responsibility to safeguard your personal information.

Defining ‘Personal Information’:
Under the Personal Information Protection and Electronic Documents Act (PIPEDA), personal information is defined as any recorded information “about an identifiable individual”.

Fair Information Principles:
PIPEDA sets out 10 principles of fair information practices, which set up the basic privacy obligations under the law. Applicable to PBL, these principals are:

1. Accountability – PBL should appoint someone to be responsible for privacy issues. PBL should make information about its privacy policies and procedures available to clients and employees.

To enquire further about PBL’s Privacy Policy, requests should be sent in writing to the PBL Privacy Officer:

Bert Weerts, Vice President
bweerts@pblinsurance.com

2. Openness - PBL’s privacy policies and practices must be understandable and easily available.

PBL will make this Privacy Policy accessible by:

- www.pblinsurance.com
- Email upon request to the Privacy Officer (in compliance with AODA, it will be PDF screen reader capable)
- In writing, in each PBL branch
- PBL Privacy Brochure

PBL reserves the right at its sole discretion to update, change, modify, add or remove its Privacy Policy from time to time, as reasonable and appropriate. Such changes will be published in a timely fashion.

Related document references:

- PBL PIPEDA 1 – Personal Information Property/Casualty and Other Consent Form
- PBL PIPEDA 4 – Personal Information Oral Consent Acknowledgement Form
- PBL PIPEDA 5 – Personal Information Commercial Client Agreement Consent Form
- PBL Privacy Brochure

3. Identifying purposes - PBL must identify the reasons for collecting your personal information before or at the time of collection.

PBL would collect your personal information for such purposes as to:

- Provide you and/or your dependents with the requested insurance coverages;
- Establish your identity;
- Protect you and PBL from error and fraud;
- Provide you with ongoing services.

4. Consent - PBL should clearly inform you of the purposes for the collection, use or disclosure of personal information.

Your knowledge and consent are required before PBL may collect, use or disclose your personal information, except in special circumstances. Your consent is a voluntary agreement you provide to PBL to support what you are proposing PBL to do for you regarding its products or services.

- Express Consent: Express consent is given explicitly, either orally or in writing. Written consents are requested through the applicable PBL Consent form each and every time PBL sets up a file for you.
- Implied Consent: Implied consent arises where the consent may reasonably be inferred from the action or inaction of the individual. If you have an existing policy with PBL and you request amendments to the policy, it is assumed that the express consent which you gave to PBL upon purchasing the original policy remains in effect.
- Refusing or Withdrawing Consent: If you refuse or withdrawal your consent at any time, upon reasonable notice, subject to legal or contractual restrictions, you must be aware, however, that withdrawing your consent may affect PBL’s ability to continue to provide you with the products or services that you have or would have liked to receive.
Where Express Consent is not required: Users of the PBL website, or users of insurer sites which may be affiliated with the PBL product or service you are requesting or you are using, do so by signifying their consent to PBL’s Privacy Policy. If you do not agree with PBL’s Privacy Policy, please do not use the PBL website or affiliated websites.

5. Limiting collection - PBL should limit the amount and type of the information gathered to what is necessary.

PBL limits the collection of personal information to information which is Reasonable, Relevant and Really Needed. The purposes for which PBL needs to collect your personal information will dictate the specific types of information to be collected, which could include:

- Name, address, telephone or fax number, email address
- Gender, date of birth and marital status
- Prior insurance history including claims history
- Credit or banking information and past payment records
- Driver license(s) (photocopies or scanned images are not allowed)
- Details about your property (ie value, contents)
- Employment information or Social Insurance Number
- Medical information (ie conditions affecting your operation of a vehicle)
- Video or audio security tapes (image of insured item or recordings of phone calls)

PBL may obtain the information above from:

- You or your legal dependent (written, electronic or oral through recorded phone calls)
- Other insurance companies, brokers or agents
- Financial institutions or credit organizations
- Motor vehicle and driver licensing authorities
- Medical professionals or your employer

Private internet communications:

As the explicit privacy of any internet user cannot be guaranteed, PBL does not assume any responsibility for any harm, loss, or damage that might occur by the sending of personal information via the internet.

When you visit the PBL website, information about you may also be collected through PBL’s use of Google Analytics for the purposes of search engine optimization and ad customization. Cookies may temporarily record:

- Your IP address, the type of operating system and browser you use and your computers location
- Which pages you visit on the PBL website and which links you click on
- Other sites you have visited recently

None of this data is considered personal information. Cookies do not in any way identify you.

6. Limiting use, disclosure and retention - In general, PBL should use or disclose your personal information only for the purpose for which it was collected. PBL will keep your personal information only as long as necessary.

The main reasons PBL collects personal information from you is to:

- Complete application forms for insurance as may be legislatively required;
- Verify your credit information;
- Administer a claim;
- Manage the client relationship;
- Complete a sale or transaction;
- Comply with an employment contract.

If it is a necessary part of any of these transactions, PBL may disclose your information to another company. For example, when you apply for third party payment, PBL may pass on your personal information to a credit reporting agency to complete that transaction. PBL may also pass on your name and address to a courier company to complete a delivery.

For our existing groups and benefit plan participants, PBL will continue to use and disclose your personal information previously collected in accordance with our current privacy code, unless you inform us otherwise. PBL will infer that consent has been obtained for the continued use or disclosure of your personal information by the processing of any existing or future benefit claims that you submit for reimbursement.
7. **Safeguards** - *PBL needs to protect your personal information against loss or theft by using appropriate security safeguards.*

PBL takes every reasonable measure possible to protect client and employee personal information, such as:

- System and computer passwords, including regular and mandatory updates
- Firewalls
- Encrypted data files
- Encrypted personal information when it is sent over the internet
- Regular education and training of staff and third party vendors on PBL’s Privacy Policy

PBL operates in a paperless environment and only retains your personal information so long as it is needed to effectively provide you with insurance coverage or for a reasonable length of time thereafter in order to meet any potential obligations or legal or government requirements. PBL will use the utmost of care in the proper disposal or destruction of your personal information.

8. **Individual access** - *Generally speaking, you have a right to access the personal information that PBL holds about you.*

To review the personal information which PBL has about you, simply contact your broker. Basic personal information can be verified on the spot, at no charge.

To access your full personal information file:

A written request may be made to PBL’s Privacy Officer, stating as specifically as possible which personal information you are requesting. You will be required to provide proof of your identity prior to PBL providing access to any personal information.

PBL has thirty (30) days to respond to such requests, and may charge a reasonable fee for providing such access to your personal information, but only after advising you first of the approximate fee cost.

PBL may refuse your request for access to your personal information if the information is:

- Protected by solicitor – client or litigation privilege
- Likely to reveal personal information about another individual and PBL is unable to separate the personal information
- Used for the detection and prevention of a criminal activity or the dealings in the proceeds of a crime or fraud
- Generated in the course of a formal dispute resolution process

9. **Accuracy** – *PBL should keep your personal information as accurate, complete and up to date as necessary.*

To ensure that the personal information PBL has about you is accurate, complete and up-to-date, it is your obligation to inform PBL promptly of all changes.

10. **Recourse** (Challenging compliance) - *PBL must develop simple and easily accessible complaint procedures. When you contact PBL about a privacy concern, you should be informed about avenues of recourse.*

If your concern with PBL’s maintenance of your personal information remains unresolved, please contact:

- The Office of the Privacy Commissioner of Canada
  - 30 Victoria Street
  - Gatineau, Quebec K1A 1H3
  - Email: notification@priv.gc.ca or Website: www.priv.gc.ca
  - Phone: 819.994.5444
  - TTY: 819.994.6591
  - Toll Free: 1.800.282.1376
  - Fax: 819.994.5424