



## **PRIVACY POLICY**

Release Date: July 25, 2011

Simmlands is committed to protecting the privacy and the confidentiality of our brokers and their Insureds' personal information. In order to comply with privacy legislation, we have developed this Privacy Policy. Any personally identifiable information about an Insured is considered personal information and will be treated in accordance with this Privacy Policy.

### **IDENTIFIED PURPOSES**

Simmlands collects, uses, and discloses Personal Information for the following purposes:

- Offering and providing insurance and related products and services;
- Verifying the identity and the accuracy of personal information with government agencies, industry associations, or other Insurers;
- Analyzing, assessing and underwriting risks on a prudent basis;
- Investigating and paying claims;
- Detecting and preventing fraud or other illegal activities;
- Compiling statistics;
- Complying with the laws or the requests of law enforcement agencies or regulators.

*In this Privacy Policy, the above list of Identified Purposes will be referred to as the 'Identified Purposes'.*

### **THIRD PARTY DISCLOSURE**

Simmlands may share information about you with third party companies, as permitted by law. Such disclosures may include those that Simmlands feels are required to provide customer service, prevent fraud, perform research or comply with the law. Recipients may include Simmlands' family of insurance service companies, claims representatives, service providers, consumer reporting agencies, insurance agents and brokers, law enforcement, courts and government agencies. These parties may disclose the information to others as permitted by law.

### **PRIVILEGE & CONFIDENTIALITY NOTICE - Electronic Messages**

Electronic mail or faxes and any files transmitted with them are confidential and may be privileged and are intended solely for the use of the individual or entity to whom they are addressed. If you have received this e-mail in error, please notify the sender immediately.

### **CONSENT**

Simmlands relies on the following actions by our Brokers and Companies as indication of their consent from an Insured to our existing and future Personal Information practices:

- The Broker has voluntarily requested personal information from an Insured for the purpose of acquiring an insurance contract or related service or product;
- The Broker has the Insured's express consent or acknowledgement contained within a written, verbal or electronic application process;

- The Insured's consent solicited by our Companies or our Brokers is for a specified purpose;
- The Broker must provide the Insured with a copy of their privacy policy and must inform Simmlands of any withdrawal of this consent by an Insured;
- The Broker may obtain the Insured's consent through the Insured's authorized representative such as a legal guardian, agent or holder of a power of attorney.

If an Insured refuses to provide the Broker with certain Personal Information or withdraws their consent Simmlands may be unable to provide insurance coverage.

## **LIMITING COLLECTION AND RETENTION OF PERSONAL INFORMATION**

Simmlands will only collect, use or disclose personal information that is necessary for the Identified Purposes or as required by law. We will retain personal information only as long as necessary for the fulfillment of the Identified Purposes.

Regarding the storage of information, Simmlands may use third party sites in jurisdictions outside of Canada.

## **ACCURACY**

Simmlands requests our brokers to maintain the Insured's Personal Information as accurate, complete, and up-to-date as is necessary for the Identified Purposes.

## **SAFEGUARDS**

Simmlands will protect the Insured's Personal Information by security safeguards appropriate to the sensitivity of the information. Safeguards will vary depending on the sensitivity, format, location and storage of the Personal Information.

## **ACCOUNTABILITY, OPENNESS AND ACCESS**

Simmlands is responsible for all Personal Information under its control and has designated a Privacy Officer who is accountable to Senior Management for Simmlands' compliance with the Privacy Policy.

You may contact our Privacy Officer at [PrivacyOfficer@simmlands.com](mailto:PrivacyOfficer@simmlands.com)

## **CHALLENGING COMPLIANCE**

If any Broker is not satisfied with our response to a privacy related inquiry or complaint, they may contact the **Office of the Privacy Commissioner of Canada** during business hours at **1-800-282-1376** or at [www.privcom.gc.ca](http://www.privcom.gc.ca).