



Assumption Life

Investing in Your Future

PRIVACY POLICY

Privacy Policy
TABLE OF CONTENTS

1. INTRODUCTION	3
2. APPLICATION	3
3. POLICY	4
3.1 Accountability	4
3.2 Identifying purposes for the collection of information	5
3.3 Consent	5
3.4 Limiting Collection	6
3.5 Limiting Use, Disclosure and Retention	6
3.6 Accuracy	6
3.7 Safeguards	6
3.8 Openness	7
3.9 Individual Access	7
3.10 Challenging Compliance	8
4. DEFINITIONS	9
4.1 Director	9
4.2 Client	9
4.3 Collection	9
4.4 Consent	9
4.5 Disclosure	9
4.6 Employee	10
4.7 Complaint	10
4.8 Personal Information	10
4.9 Third Party	10
4.10 Use	10

Privacy Policy

1. INTRODUCTION

- 1.1 Assumption Mutual Life Insurance Company operates in the Atlantic Provinces, Québec, Ontario, Alberta and British Columbia, offering a full range of insurance and financial products and services including individual life insurance, group insurance, pension plans, investments and mortgage loans. **Personal information** consists of essential information the Company uses in providing products and professional services to its clients.
- 1.2 Assumption Life takes all appropriate measures to protect the personal information of its clients, employees and directors. The purpose of this policy is to reinforce the relationship of trust the company has established with its clients, employees and directors.
- 1.3 Assumption Life's commitment is in accordance with the requirements set out in the *Personal Information Protection and Electronic Documents Act* (Canada), the Model Code for the Protection of Personal Information of the Canadian Standards Association, Assumption Life's code of ethics, and provincial laws governing privacy.

2. APPLICATION

- 2.1 The Company's commitment to the protection of personal information extends to the collection, retention, use, disclosure, protection and accuracy of the personal information collected and managed by Assumption Life.
- 2.2 The policy applies to the management of personal information in all its forms, whether oral, written or electronic.
- 2.3 The Company's officers, directors and employees are required to comply with the privacy policy.
- 2.4 Compliance with the policy is mandatory. Non-compliance with the policy can result in disciplinary measures up to and including termination or dismissal.
- 2.5 Any person who becomes aware of any infringement of the privacy policy is required to inform the Company's Compliance Officer immediately.

3. POLICY

Assumption Life's privacy policy is based on 10 principles. These are interrelated, and Assumption Life complies with them as a whole.

1. Accountability
2. Identifying purposes
3. Consent
4. Limiting collection
5. Limiting use, disclosure and retention
6. Accuracy
7. Safeguards
8. Openness
9. Individual access
10. Challenging compliance

3.1 Accountability

- 3.1.1 At Assumption Life, Management is accountable for compliance with the privacy policy and, to this end, has designated a **Compliance Officer** (see the contact information at the end of the policy). The Compliance Officer ensures compliance with the principles of the policy, although other employees may be responsible for the daily collection and handling of personal information. **Managers** are responsible for ensuring compliance with the principles of this policy in their respective departments. It is incumbent upon all employees, consultants and directors to comply with the policy.
- 3.1.2 Assumption Life has established a policy and related procedures designed to give effect to the 10 principles, including:
 - a. The implementation of procedures for the protection of personal information.
 - b. The introduction of a training program to increase staff awareness of the policies and procedures pertaining to the protection of personal information.
 - c. the preparation of documents for clients, employees, directors and the general public outlining Assumption Life's commitment to the protection of personal information;
 - d. periodic reviews of the policy and procedures to ensure their ongoing effectiveness.
- 3.1.3 Assumption Life is responsible for all personal information in its possession or under its control, including personal information disclosed to a third party.
- 3.1.4 When Assumption Life enters into a service agreement with a third party for the delivery of customer services, it uses contracts or other means to ensure that the practices of the third party with regard to privacy protection are compatible with those of Assumption Life.

Privacy Policy

3.2 Identifying Purposes

- 3.2.1 Assumption Life may gather personal information on its clients directly from the client, from brokers or general agents, from health specialists, hospitals, clinics or other facilities of a medical or paramedical nature, from other insurance companies, from the Medical Information Bureau, or from any other organization or person who maintains files or personal information on the client.
- 3.2.2 This information is required for specific purposes, such as:
- a. Establishing eligibility for products
 - b. Underwriting and rating risks
 - c. Processing claims
 - d. Communicating with reinsurers
 - e. Communicating with the Medical Information Bureau to identify cases of fraud, and
 - f. Building client files
- 3.2.3 Assumption Life ensures that consent or application forms specify in writing the purposes for collecting personal information.
- 3.2.4 Before making use of personal information for any purpose not previously specified, Assumption Life identifies and documents the new purposes for the use or disclosure of personal information and obtains the client's consent, unless these new purposes are required by law.
- 3.2.5 Employees of Assumption Life who collect personal information in the course of their duties are able to explain the purpose for which the information is collected.

3.3 Consent

- 3.3.1 Assumption Life makes every reasonable effort to ensure that each person understands the intended use of his or her personal information. The Company explains to its clients, employees, directors, consultants and others how the personal information will be used. This information is provided through printed documents, application forms, the Company's Web site, customer service or the Compliance Officer.
- 3.3.2 Assumption Life obtains the consent of the individual concerned for the acquisition, use or disclosure of personal information. The Company takes into account the sensitivity of the information in determining the type of consent required. When the information is classified as sensitive, consent must be explicit. Consent can be obtained in person, by telephone, by mail or through the Internet.
- 3.3.3 The Company obtains the consent of the individual concerned to disclose information to or obtain information from a third party.

Privacy Policy

3.3.4 Under certain circumstances, the Company may collect, use or disclose information without the consent of the individual concerned. For example:

- a) For legal purposes, in medical emergencies, or for security reasons;
- b) For controlling the application of the law or for detecting or preventing fraud.

3.3.5 A person may revoke or cancel his or her consent at any time. When a person withdraws his or her consent, Assumption Life informs that person of the consequences of doing so.

3.4 Limiting Collection

3.4.1 Assumption Life collects only the personal information that is required for the specified purpose.

3.4.2 Assumption Life shall not deceive or mislead the individual concerned with regard to the reason for collecting personal information. Assumption Life's employees are able to explain the purposes for which the personal information is collected.

3.5 Limiting Use, Disclosure and Retention

3.5.1 The Company obtains the consent of the individual concerned before using that person's personal information for any purpose other than that for which the information was collected.

3.5.2 Assumption Life does not disclose client lists nor any other type of personal information to any other party without the written consent of the person concerned.

3.5.3 Assumption Life retains personal information according to its document retention policy. The Company ensures that personal information is destroyed, erased or depersonalized after it is no longer required for its intended purpose, according to its document destruction policy.

3.6 Accuracy

3.6.1 The degree of accuracy, timeliness and completeness of the personal information depends on its intended use, taking into account the interests of the individual concerned.

3.6.2 Assumption Life updates the personal information in its possession as and when required for the purpose for which the information was collected or as requested by the individual concerned.

3.7 Safeguards

3.7.1 Assumption Life protects personal information from loss and theft as well as from unauthorized consultation, disclosure, copying (electronic or paper), use or modification.

Privacy Policy

3.7.2 The nature of the safeguards will vary according to the sensitivity of the personal information collected, according to the amount, distribution and format of the personal information, and according to the means of storage. Safeguards may include:

Physical Measures	<ul style="list-style-type: none">• Access cards, locked filing cabinets, “clean” workstations
Technological Measures	<ul style="list-style-type: none">• Passwords, firewalls, network configuration, encryption, voice mailboxes
Organizational Measures	<ul style="list-style-type: none">• Well-defined levels of authorization (restricted access); contracts, confidentiality agreements; continuous training

3.7.3 Awareness and training sessions on security measures are provided for employees on a regular basis.

3.7.4 Assumption Life also prevents unauthorized persons from gaining access to personal information during its disposal or destruction.

3.8 Openness

3.8.1 Assumption Life has an open approach to privacy policies and practices.

3.8.2 Assumption Life informs any individuals concerned of its privacy policies and practices, upon request.

3.8.3 The information provided must be easily understood and shall include the following:

- a. The name, title and address of the person responsible for applying the policy (the Compliance Officer).
- b. Instructions for gaining access to any personal information held by Assumption Life.
- c. A description of the type of information held by the Company and a general explanation of the purpose for which it will be used.
- d. A copy of any materials outlining the privacy policy, and
- e. The nature of any personal information disclosed to a third party.

3.9 Individual Access

3.9.1 Upon presentation of a written request by an individual, Assumption Life offers that person an opportunity to view any personal information that the Company holds on him or her. The Company provides the information requested in a comprehensible format, within a reasonable time and at a reasonable cost. Assumption Life may, however, request that sensitive medical information be provided to the individual concerned through a medical practitioner.

3.9.2 Assumption Life informs the person making the request of any use that the Company is making or has made of the information or of any disclosure of the information. If possible, the Company also identifies the source of the information and any third parties to whom the information has been disclosed. When it is not

Privacy Policy

possible to provide a list of such persons, the Company provides a list of all organizations to which it may have disclosed the information.

- 3.9.3 To protect personal information, Assumption Life verifies the identity of the person making the request and may require that the person provide official identification prior to informing him or her of the existence, use or disclosure of personal information or providing access to this information. Data collected for purposes of identification is used solely for that purpose.
- 3.9.4 Assumption Life corrects and completes, in a timely manner, any personal information that is found to be inaccurate or incomplete. A note is added to the client's file concerning any unresolved issues regarding the accuracy or completeness of any information. Where applicable, Assumption Life informs all third parties who have access to the personal information of any changes made to the information and of any unresolved issues.
- 3.9.5 A person may obtain information or gain access to his or her personal information by contacting the customer service representative of the department in question.
- 3.9.6 In certain cases, it may be impossible for Assumption Life to disclose all the personal information it holds on a person. Possible reasons for this include legal or security issues, medical reasons, or the fact that the information is subject to solicitor-client or litigation privilege or may contain information on other persons. Upon request, Assumption Life informs the person of the reasons for denying access.

3.10 Challenging Compliance

- 3.10.1 Assumption Life has set up procedures for receiving and handling complaints regarding any alleged violation of its privacy policy.
- 3.10.2 Assumption Life informs its clients, employees and directors of the existence of its complaints process.
- 3.10.3 Assumption Life investigates all complaints and responds within twenty (20) working days from the moment the file is complete. If the complaint is found to be justified, Assumption Life takes the necessary steps to resolve the problem, including the modification of its policies and procedures.
- 3.10.4 If a person is not satisfied and wants to file a complaint with regard to the protection of personal information, he or she may contact the following:

Compliance Officer

Assumption Life
P.O. Box 160 / 770 Main Street
Moncton, NB E1C 8L1
Tel.: 1-800-455-7337 or (506) 853-5422
Fax: (506) 853-5421
E-mail: customer.inquiries@assumption.ca

Privacy Policy

- 3.10.5 A person who feels that their personal information has not been protected in compliance with applicable laws or Assumption Life's policy may also contact the Office of the Privacy Commissioner of Canada:

Office of the Privacy Commissioner of Canada

112 Kent Street
Place de Ville
Tower B, 3rd Floor
Ottawa, Ontario K1A 1H3

- 3.10.6 For any other type of complaint, consult the "Resolving a Complaint" section on Assumption Life's Web site. ([Click here](#))

4. DEFINITIONS

4.1 Director or Member of the Board of Directors

A person who sits on the Board of Directors of Assumption Life.

4.2 Client

A person, firm, or organization that purchases or applies to purchase products or services from Assumption Life.

4.3 Collection

The action of collecting, acquiring, recording or otherwise obtaining personal information from any source, including third parties, by any means whatsoever.

4.4 Consent

Authorization freely given for the collection, use or disclosure of personal information for specific purposes. Consent may be **explicit** and may be given verbally, electronically or in writing, but it is always unequivocal and does not require the intervention of Assumption Life. **Implicit** consent refers to consent that can be reasonably implied from the action or inaction of a person.

4.5 Disclosure

The act of making personal information accessible outside of the Company.

Privacy Policy

4.6 Employee

A person hired by Assumption Life and working full time, part time, on a temporary basis or under an employment or service contract, whether that person is included on the Company's payroll or is paid by the Company either directly or through a third party. The term "employee" also includes any **career agent or exclusive agent** selling Assumption Life products. Interns hired for a fixed period are also considered employees of Assumption Life for the purposes of this policy.

4.7 Complaint

A complaint is the expression of dissatisfaction by, or on behalf of, a client or employee with respect to the practices or decisions of Assumption Life or one of its employees, representatives or intermediaries concerning the fulfilment or nonfulfilment of an obligation pursuant to a law, regulation or agreement, which persists subsequent to consideration and processing by an employee normally qualified to make decisions in this regard.

4.8 Personal Information

Any information pertaining to an identifiable person, such as:

- race
- ethnic origin
- colour
- religion
- age
- marital status
- education
- medical file
- criminal record
- professional history
- records of participation in financial transactions
- any unique identifying number or symbol
- address, fingerprints or blood group
- personal opinions or ideas
- any correspondence of a private or confidential nature
- ideas or opinions expressed by others regarding the person in question
- ideas or opinions expressed by others in relation to a proposal for a grant or an award to the person by an institution
- the person's name when mentioned in connection with other personal information or when the mere disclosure of a person's name might reveal personal information about that person.

However, an employee's, client's or director's name, title or business address, telephone number, e-mail address or fax number are not considered personal information.

4.9 Third Party

A person, firm or organization other than Assumption Life.

4.10 Use

The act of using personal information within the Company.