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# Our Commitment to Protect Your Personal Information



**Assumption Life**

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This document provides an overview of our practices regarding the collection, use, disclosure and protection of your personal information.

“**Personal Information**” means any information that could identify an individual. It can also be a combination of general information that could identify an individual. This may include your name, address, telephone number, financial information, and health- or lifestyle-related information. Personal information does not include information that could not identify you or that has been anonymized.

“**Data**” means any personal information about an individual as well as any confidential information about a legal entity.

## Our Commitment

Protecting of your personal information is at the core of our business at Assumption Life.

Our commitment is guided by our prudent and responsible privacy policy and practices, as well as by applicable laws, regulations and standards in the life insurance industry. At Assumption Life, we foster a culture of compliance focused on protecting our clients’ interests.

Our commitment to you begins as soon as we collect any data about you. For instance, when you purchase our products and services, but also when you visit our websites or our social media accounts.

Our commitment applies to all forms of communication with us, including mail, telephone, email or any other electronic means.

## Collection

If we collect any of your personal information, we will inform you of the purpose for collecting and using said information. We rely on transparency to allow you to fully understand the reason for collecting your personal information so that you may give your informed consent. Our forms include all required notices and consents. Our websites also contain additional useful sections and links so that you may be informed of the relevant terms of use.

## What Kind of Information Do We Collect?

We only collect the data we need about you. The type of personal information we request depends on the type of product or service involved. It can be a life insurance product or service, an application for an annuity contract in accumulation or in payment, a pension plan or a mortgage loan.

Some of the personal information we typically collect includes:

- Basic contact information, such as your name, address, telephone numbers, email, date of birth, marital status, nationality;
- Information about your beneficiaries;
- Name of your employer, your trade or profession;
- Financial information, such as banking information, annual income, contributions, investor profile, retirement goals, sources of income and bank statements;
- Social insurance number (SIN) — (mandatory for tax purposes in the case of income-generating products);
- Credit history;
- Medical information and lifestyle habits, medical history, diagnoses and prognoses (depending on the type of insurance you select).
- Any relevant information in connection with surveys, client service interactions or the filing of a complaint.

When you communicate with us by telephone or when we communicate with you by telephone, we will take all reasonable steps to identify you. The call may be recorded.

When you contact us using any other means, we will take all reasonable steps to confirm that the request comes from you.

## Information About Your Dependents

We may also collect information about your spouse, children or other dependents if you chose a group insurance plan, or a product or service that makes it necessary to collect their personal information. For example, when they have rights or are covered under an insurance or annuity plan, or when they are designated as beneficiaries. Concerning your minor children, we will comply with applicable laws by obtaining their personal information from you or their custodial parent. We will obtain the consent of your dependents when required by applicable laws.

## Digital Data

When you access our websites or when you access your client account on the Assumption Life online platform, or for any online transaction, we may collect the following information about you:

- IP address, as well as the approximate geographic location of your connection;
- How often you visit our websites or whether you are a new visitor;
- Information about your electronic device (operating system, browser version, etc.) and the source of access to our websites;
- Pages, links and videos you view or access on our websites;
- The time you spend on our websites;
- Searches you have done on our websites; and
- Information you have voluntarily provided in surveys and forms on our websites.

The data we collect through cookies is used to improve your digital experience and evaluate the effectiveness of our websites' functionalities.

Cookies are data that a website sends and stores on your computer. On your second visit to our website, we may use the information from the cookie to make your browsing experience more user-friendly.

A cookie will not reveal your identity to us unless you have chosen to provide it to us. Cookies cannot access other information or files on your computer.

We use persistent cookies, which are files that remain in the memory of your computing device when you close your Web browser. A persistent cookie can only be read by the website that created the cookie the next time you visit that same website.

Persistent cookies have a predetermined duration and are automatically deleted from your device when they expire. You can also delete any stored cookies by changing your Web browser preferences. However, unless your system can block cookies, a new cookie will be created the next time you visit our website. You can set your Web browser to notify you when your computer receives cookies, thereby allowing you to accept or decline them. You must enable this feature in the Internet options of your computing device. Please note that blocking cookies may cause problems accessing some pages or prevent the website from loading in an optimal way.

We may share website visit data obtained through cookies and other similar technologies with Google Analytics or other analytics agents to have them analyze, on our behalf, the activity of our websites so as to ensure continuous improvement of their content and of the online tools we have developed for our clients and the general public.

If you click on links on our websites that direct you to third-party websites, please be aware that we cannot guarantee that these meet our privacy standards and commitments. Therefore, we assume no liability for non-compliance with applicable laws by third parties.

### **From Whom Can We Obtain Your Personal Information?**

In some cases, such as when reviewing your insurance application or a claim, we may, with your consent, need to ask other independent sources to provide, verify or complete the personal information we require. These sources may be:

- Our service providers;
- Insurance representatives, agents, brokers;
- Other insurance companies or financial institutions;
- Your employer if you are part of a group insurance or annuity plan;
- Credit reporting agencies;
- Police force during investigations or to obtain a copy of your criminal record when required;
- Your doctor or other healthcare professional;
- Health center, hospital or other health facilities;
- A public or private organization that provides healthcare management, payment or reimbursement services;
- The Medical Information Bureau.

### **Why Do We Collect Your Personal Information?**

In general, we collect, use and disclose your personal information for the following purposes:

- Confirm your identity and create a client file;
- Assess your needs, and determine your eligibility and insurability for the insurance or annuity products and services you have applied for;
- Assess your application for a mortgage loan;

- Assess your claim file;
- Improve your client experience and provide you with personalized services that cater to your expectations;
- Define your current and future needs; for example, by conducting client surveys and other forms of market analyses;
- Offer the products and services that suit you best, as well as when we receive a service request;
- Protect you and the company from error, fraud or misrepresentation;
- Keep your information up to date;
- Send you annual statements and contact you on a timely basis;
- Investigate complaints or evaluate claims, and respond to your inquiries; and
- Take any action for tax purposes, etc.

In a continuing effort to upgrade our products and services, we may use your de-identified data to improve our business processes, update our products and services, and assess our clients' behavior when using our websites and digital systems.

When we use your information for analytical purposes, we do so in a manner that respects your rights and interests. If it is not possible to de-identify or anonymize your data as part of our internal research and analysis process, we will take steps to ensure that our use of your data is fair and minimally intrusive, depending on the sensitivity of the information used. The more sensitive the nature of the information used, the more rigorous the measures put in place will be to ensure that the information has been de-identified and protected.

### **To Whom Do We Disclose Your Personal Information?**

We are responsible for protecting the confidentiality of your data. Our employees whose duties and functions allow them access to your personal information receive mandatory security and privacy training and must also agree to protect the confidentiality of your personal information.

Our commitment also extends to our service providers to which we delegate certain administrative tasks because of their expertise. We enter into administrative agreements with them to make sure they can uphold comparable standards of prudence in terms of privacy protection and computer security.

We also have similar agreements in place with our reinsurers as well as with insurance representatives and companies to require them to comply with applicable laws and standards.

We only share your personal information with our representatives, reinsurers and service providers, when they need it for the delivery of their services. These services may include:

- Management of computer, digital or cloud-based systems, as well as data storage, retention and destruction services;
- Information technology support services;
- Computer security services;
- Administrative services for ratings, underwriting and product issuance;
- Claims review services;
- Reinsurance services;
- Medical, dental, travel assistance services;
- Regulatory compliance file review or fraud prevention services;
- Promotion, marketing, survey, market research services; and
- Actuarial consulting, actuarial valuation, risk analysis, litigation management and legal services.

## How Do We Protect Your Personal Information?

At Assumption Life, protecting your data is one of our core values. For this reason, we have implemented a series of measures to protect your data contained in physical spaces, but also those contained on our digital systems. We follow insurance industry standards, and constantly update our security program and tools to protect your data. These measures are essential to protect your data from the risk of loss, theft, unauthorized access, communication or improper use.

We are committed to notifying you of any computer security incident or unauthorized access to your personal information, as required by applicable laws.

You can consult our Terms of Use section accessible on our websites for more details about the rules applicable to the use of our websites for the protection of your data.

## Your Consent

We collect, use and disclose your personal information for the identified purposes only, based on the products and services we offer and only with your consent or as required by law. You may give your express consent in writing, verbally, electronically or through your authorized representative such as an agent, a mandatary or a trustee. Your consent may also be implied. For instance, when you or your dependents present a health insurance card to a healthcare provider (e.g., pharmacist), you are deemed to consent to the collection, use and disclosure of your personal information for the specific purposes of processing a medical claim.

Subject to applicable legal or contractual restrictions, you may withdraw your consent at any time. However, depending on the circumstances, refusing to provide certain personal information or withdrawing consent may prevent us from providing you with the requested product or service, or may prevent us from assessing your claim.

## Additional Information for Marketing Purposes

We may request additional personal information about you to better advise you and inform you about other products and services that may be of interest to you. If you do not wish to receive additional offers or information, you may withdraw your consent at any time by contacting us using the contact information listed at the bottom of this document.

## Retention of Your Personal Information

We keep your data in compliance with the deadlines prescribed by applicable laws and according to the duration required for us to serve you well. We may retain your data after the end of our relationship with you to meet regulatory requirements. These requirements relate to limitation periods, taxation, employment and other applicable laws in Canada. We will destroy your data when the retention period expires.

## How to Access or Correct Your Personal Information?

You have the right to consult your personal information, verify its accuracy and notify us of any necessary changes. To access your file, you must submit a written request to Assumption Life.

If you are denied access to your personal information for any reason, please let us know by contacting the Chief Compliance Officer using the information on the last page of this document.

To make any changes to your personal information, please contact Assumption Life's client service department. You can do so by accessing your client account on our website (<https://www.assumption.ca>) or by dialing the following toll-free number: 1-800-455-7337.

## Use of Social Media

The use of social media by consumers is becoming increasingly common. Assumption Life is present on some social media platforms to promote its products, services as well as its activities and events of public interest. Members of the public, including our clients, can comment and disseminate messages of common interest. You can thus freely express opinions and comments. Your messages are appreciated.

However, we cannot guarantee the confidentiality of any messages you post about yourself on social media. For this reason, we strongly advise you to refrain from posting personal information about yourself on these platforms. For example, you should not disclose your Assumption Life client number, policy number, any health or claim details, or your email address, telephone number, date of birth or mailing address.

Even if some social media platforms allow the publication of private messages, we cannot guarantee their confidentiality since we do not control the settings or security controls of these platforms or in which country your disseminated data on these platforms will be stored. For this reason, your private message should not contain sensitive personal information about you. If you need to communicate with us regarding sensitive subjects or your client file, we invite you to do so using traditional, more secure and confidential means of communication.

By posting a public comment, you acknowledge that the information contained therein is not confidential. Therefore, you give us the right to reuse or share it in any way with the public.

When you post a message or comment on our social media accounts, we expect you to comply with the following requirements:

- Not to disclose or publicly refer to information about other individuals, including our employees, representatives and service providers, if such information has not been voluntarily made public by the individuals concerned;
- Comply with copyright laws;
- Refrain from making racist, sexist or offensive comments;
- Refrain from making abusive, hateful or defamatory comments;
- Refrain from spreading false information or encouraging people to commit acts that are reprehensible or prohibited by law; and
- Refrain from posting links that direct people to a website that contains content that encourages people to act against the principles listed above or that contains a virus.

Assumption Life is not responsible for any damage or loss that third parties may suffer because of the messages you post on social media.

## Questions or concerns?

If you have any questions or concerns, please contact the person responsible for the protection of personal information at Assumption Life at the following address:

### Chief Compliance Officer

Assumption Life  
P.O. Box 160 / 770 Main Street  
Moncton, N.B. E1C 8L1  
Tel.: 1-800-455-7337  
Email: [compliance@assumption.ca](mailto:compliance@assumption.ca)

To file a complaint with our Ombudsman, please use the contact information below:

### Ombudsman

Assumption Life  
P.O. Box 160 / 770 Main Street  
Moncton, N.B. E1C 8L1  
Tel.: 1-506-853-6040  
Toll-free: 1-800-455-7337  
Email: [complaints@assumption.ca](mailto:complaints@assumption.ca)

The Ombudsman will review your privacy complaint. They will explain the steps involved in the process and his or her complaint handling practices. If you are not satisfied with the Ombudsman's decision at the end of the investigation, they will present you with other options available to you.

## Complaint to the Privacy Commissioner

If you are not satisfied with Assumption Life's response to a privacy request or complaint, you may contact the Privacy Commissioner depending on your province of residence Canada (except Alberta, British Columbia and Québec).

If you live in a Canadian province or territory (except Alberta, British Columbia and Québec), you may contact the Privacy Commissioner of Canada at:

### Privacy Commissioner of Canada

30 Victoria Street  
Gatineau, Québec K1A 1H3  
Toll-free: 1-800-282-1376  
Tel.: 819-994-5444  
TDD: 819-994-6591

To file a complaint: <https://priv.gc.ca/en/report-a-concern/file-a-formal-privacy-complaint/file-a-complaint-about-a-business/>

## Alberta

For Alberta residents, you may contact the Information and Privacy Commissioner at:

### **Office of the Information and Privacy Commissioner (Edmonton)**

#410, 9925 - 109 Street NW  
Edmonton, AB T5K 2J8  
Tel.: 780-422-6860  
Fax: 780-422-5682

### **Office of the Information and Privacy Commissioner (Calgary)**

Suite 2460, 801 6 Avenue SW  
Calgary, AB T2P 3W2  
Tel.: 403-297-2728  
Fax: 403-297-2711

Toll-free: 1-888-878-4044

Email address: [generalinfo@oipc.ab.ca](mailto:generalinfo@oipc.ab.ca)

To file a complaint: <https://oipc.ab.ca/request-a-review-file-a-complaint/>

## British Columbia

For British Columbia residents, you may contact the Information and Privacy Commissioner at:

### **Office of the Information and Privacy Commissioner (British Columbia)**

P.O. Box 9038 Stn. Prov. Govt.  
Victoria, B.C. V8W 9A4  
4th Floor, 947 Fort Street, Victoria B.C. V8V 3K3

Email: [info@oipc.bc.ca](mailto:info@oipc.bc.ca)

Tel.:

Victoria: 250-387-5629

Vancouver: 604-660-2421

Elsewhere in B.C.: 800-663-7867

Fax: 250-387-1696

To file a complaint: <https://www.oipc.bc.ca/for-the-public/how-do-i-make-a-complaint/>

## Québec

For Québec residents, you may contact the Access to Information Commissioner using the following information:

### **Access to Information Commissioner (Québec)**

Suite 2.36  
525 René-Lévesque Boulevard East  
Québec, Québec G1R 5S9  
Tel.: 418-528-7741  
Fax: 418-529-3102

### **Access to Information Commissioner (Montréal)**

Suite 900  
2045 Stanley Street  
Montréal, Québec H3A 2V4  
Tel.: 514-873-4196  
Fax: 514-844-6170

Toll-free: 1-888-528-7741

Email: [cai.communications@cai.gouv.qc.ca](mailto:cai.communications@cai.gouv.qc.ca)

To file a complaint: <https://www.cai.gouv.qc.ca/citoyens/recours-devant-la-commission/pour-denoncer-une-pratique-ou-un-comportement-suspect/>