



## **Privacy and Data Protection Policy**

# Privacy and Data Protection Policy

## TABLE OF CONTENTS

1	INTRODUCTION .....	3
2	APPLICATION .....	3
3	POLICY .....	4
3.1	Accountability .....	4
3.2	Identifying Purposes.....	5
3.3	Consent .....	6
3.4	Limiting Collection.....	7
3.5	Limiting Use, Disclosure and Retention .....	7
3.6	Accuracy .....	7
3.7	Safeguards.....	7
3.8	Transparency.....	8
3.9	Access .....	8
3.10	Complaint Process.....	8
3.11	Service Providers.....	9
3.12	Breach .....	9
3.13	Report.....	10
4	RESPONSIBILITIES .....	10
4.1	Management Team.....	10
4.2	Chief Compliance Officer .....	10
4.3	Department Manager .....	10
4.4	Employees and Administrators .....	10

# Privacy and Data Protection Policy

## 1 INTRODUCTION

- 1.1. Developing and maintaining the relationship of trust the company has established with its clients, employees, representatives and directors is an important corporate value for Assumption Life.
- 1.2. Protecting personal information is an integral part of maintaining and developing this relationship of trust.
- 1.3. This policy complies 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, provincial laws governing privacy and Assumption Life's code of ethics.

## 2 APPLICATION

- 2.1. The policy applies to the management of personal information in all its forms, whether oral, written or electronic. Personal information corresponds, among others, to the following information when associated with an identifiable individual.
  - 2.1.1. Financial information
  - 2.1.2. Medical information
  - 2.1.3. Professional information:
    - Employee identification number
    - Level of education
    - Professional history
    - Performance appraisal
  - 2.1.4. Other personal information:
    - Marital status
    - Religion
    - Age
    - Race, ethnic origin or colour
    - Criminal record
    - Personal address
    - Documents containing opinions about the person
    - Any correspondence of a private or confidential nature
- 2.2. The Company's officers, directors and employees are required to comply with the privacy policy. Compliance with the policy is mandatory. Non-compliance with the policy can result in disciplinary measures up to and including termination, for employees, or dismissal, for officers.

## Privacy and Data Protection Policy

- 2.3. In this policy, *employee* indicates: An individual hired by Assumption Life and working full time, part time, on a temporary basis or under an employment or service contract, whether that individual is included on the Company's payroll or is paid by the Company either directly or through a third party. Interns hired for a fixed period, whether paid or not, are also considered employees of Assumption Life for the purposes of this policy.
- 2.4. In this policy, *representative* signifies any individual who has requested an agent code or has received an agent code to sell Assumption Life products.

### 3 POLICY

The Assumption Life Privacy and Data Protection Policy rests on 10 principles:

- Accountability
- Identifying the purposes for the collection of information
- Consent
- Limiting collection
- Limiting use, disclosure and retention
- Accuracy
- Safeguards
- Transparency
- Access to personal information
- Complaint process

#### 3.1 Accountability

- 3.1.1. Assumption Life is responsible for protecting the personal information of its employees, representatives and clients in its possession or under its control and is the user and protector of this information. This responsibility extends to protecting personal information of the general public.
- 3.1.2. Management has designated a Chief Compliance Officer to ensure compliance with this policy's principles by managing:
- Implementation and regular review of this policy.
  - Development and delivery of a training program to inform employees of the policy and associated procedures.
  - Preparation of materials for clients, employees, directors and the general public outlining Assumption Life's commitment to the protection of personal information.
  - His/her role as resource person to answer all questions on the subject.
  - Adoption of suitable departmental measures to comply with this policy.
  - Periodic reviews of the policy and procedures regarding this policy's principles. Reviews can be carried out by the internal audit department or the compliance department.
  - Communication of any significant non-compliance to the risk management officer (RMO) and the CEO.

## Privacy and Data Protection Policy

- 3.1.3. The name of the individual responsible for compliance and his/her contact information are freely available to the public.
- 3.1.4. This policy represents Assumption Life’s principles. Managers are responsible for ensuring compliance with the principles of this policy in their respective departments.
- 3.1.5. The compliance department uses the LCMS system to verify compliance with the different elements of this policy.

### 3.2 Identifying Purposes

- 3.2.1. When personal information is collected, the purpose of the collection must be set out in detail to the individual involved.
- 3.2.2. If information is to be used for any purpose not previously specified, a new consent must be obtained.
- 3.2.3. Assumption Life gathers specific information on certain groups of people; the table below summarizes the sources of information that may be gathered for different types of people.

		Client	Employee	Insurance Rep	Officer (Member of Assumption Life Board of Directors)
<b>Information Sources</b>	Insurance representatives	✓			
	Health professionals	✓	✓		
	Hospitals/clinics and other medical or paramedical facilities	✓			
	Other insurance companies	✓		✓	
	Financial institutions	✓	✓	✓	✓
	MIB, Inc.	✓			
	Credit bureaus	✓	✓	✓	✓
	Police forces	✓	✓		✓
	Current or former employers or others authorized to provide a reference on an individual (including the group plan administrator)	✓	✓	✓	✓
	Educational institutions		✓		
	Different government offices	✓			
	Private investigators	✓			

## Privacy and Data Protection Policy

- 3.2.4. Assumption Life also collects certain electronic information from members of the public and clients when they visit its Website. Although this information does not normally identify the person, Assumption Life wishes, for transparency's sake, to let clients and the general public know about the collection and use of this type of information.
- 3.2.5. In general, this information is required for specific purposes, such as:
- Establishing eligibility for products
  - Underwriting and risk rating
  - Processing claims
  - Communicating with reinsurers
  - Communicating with MIB, Inc. (Medical Information Bureau)
  - Confirming identification and building client files
  - Hiring employees, officers or insurance representatives
  - Delivering services to employees
  - For purposes prescribed by law
  - For tax purposes

### 3.3 Consent

- 3.3.1. Every individual must understand and consent to the collection, intended use or communication of his or her personal information.
- 3.3.2. Consent must be obtained from the individual concerned before acquiring his or her personal information and before using or communicating that information to a third party.
- 3.3.3. For this consent to be valid, the individual must be made aware of the purpose of acquiring this information, pursuant to the preceding clause.
- 3.3.4. A person may revoke or cancel his or her consent at any time. Assumption Life will inform that person of the consequences of so doing.
- 3.3.5. Written consent is required when the information is deemed sensitive. Verbal consent is sufficient for less sensitive information. A note must be added to the file when verbal consent is given.
- 3.3.6. Assumption Life does not use personal information it possesses without the consent of the individual concerned except for legal or security reasons or in case of a medical emergency.

## **Privacy and Data Protection Policy**

### **3.4 Limiting Collection**

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

### **3.5 Limiting Use, Disclosure and Retention**

- 3.5.1. Personal information will not be used or disclosed for any purpose other than that for which the information was collected without consent from the individual concerned or unless required by law.
- 3.5.2. Assumption Life retains personal information for only as long as necessary for the specified purpose or as required by law.
- 3.5.3. Document retention and destruction procedures are in place to determine the length of time personal information is kept.
- 3.5.4. Electronic or physical methods of disclosing personal information must offer adequate protection against breaches, according to the nature of the information being communicated.
- 3.5.5. Some provinces require that we notify our clients when their personal information could travel beyond Canadian borders. If the company wants to use a service provider and send our clients' or employees' information out of the country, the Chief Compliance Officer must be notified to determine appropriate measures.

### **3.6 Accuracy**

- 3.6.1. The degree of accuracy, timeliness and completeness of the personal information depends on its intended use.
- 3.6.2. Those concerned can request that their information be updated.

### **3.7 Safeguards**

- 3.7.1. The level of protection for personal information stored electronically or on paper must reflect the sensitivity of the information.
- 3.7.2. Personal information is protected against loss and theft as well as from unauthorized examination, disclosure, copying (electronic or paper), use or modification.
- 3.7.3. Assumption Life's Chief Information Officer (CIO) ensures that adequate controls are in place to guarantee the integrity, security and protection against unauthorized use of information contained in our computer systems.

## Privacy and Data Protection Policy

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

### 3.8 Transparency

3.8.1. Assumption Life informs all concerned individuals of its privacy policies and practices upon request and by posting them on its Website.

3.8.2. The information provided must be clear and include the following:

- Name, title and address of the person responsible for this Assumption Life policy (the Chief Compliance Officer).
- Instructions for gaining access to any personal information held by Assumption Life.
- Description of the type of information collected by the Company and a general explanation of the purpose for which it will be used.
- A copy of any materials outlining the privacy policy.
- Nature of any personal information disclosed to a third party.

### 3.9 Access

3.9.1. Generally, anyone can access his or her personal information held by Assumption Life to the extent permitted by law. Individuals must make a written request to have access to their information. Assumption Life has set up adequate procedures to deal with all requests in a timely manner.

Assumption Life is not required to disclose to the concerned party personal information if:

- Granting access to the information in all probability discloses information on a third party.
- The information is subject to professional privilege.
- The information comprises a possible or actual breach of an insurance contract or offence under a law.
- The information was collected as part of an official conflict resolution process.

### 3.10 Complaint Process

3.10.1 Assumption Life informs the public, its clients, employees and directors about its complaint process.

3.10.2 Assumption Life investigates all complaints and responds within twenty (30) working days, starting when the file is complete. If the complaint is found to be justified, Assumption Life will take the necessary steps to resolve the problem, including, if required, modifying its policies and procedures. All written complaints regarding the protection of personal information must be sent to the Chief Compliance Officer.

## Privacy and Data Protection Policy

- 3.10.3 All individuals who are not satisfied and want to file a complaint concerning the protection of personal information may contact:

**Chief Compliance Officer**

Assumption Life  
P.O. Box 160 / 770 Main Street  
Moncton NB E1C 8L1  
Telephone: 1-800-455-7337 or 506-853-5444  
Fax: 506-853-5421  
Email: [complaints@assumption.ca](mailto:complaints@assumption.ca)

- 3.10.4 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**

30 Victoria Street  
Gatineau, Quebec K1A 1H3

Email: [notification@priv.gc.ca](mailto:notification@priv.gc.ca)  
Telephone: 1-819-994-5444  
Toll-free: 1-800-282-1376

### 3.11 Service Providers

- 3.11.1. Assumption Life uses third-party service providers and subcontractors to carry out its activities effectively. When Assumption Life grants these suppliers access to its clients' or employees' personal information, it must have adequate notice and consent mechanisms in place. Notice and consent must be adapted when service providers are located outside Canada. Assumption Life must also be satisfied that service providers have adequate controls in place to protect personal information. Contracts with service providers must contain clauses adapted to the risks involved.

### 3.12 Breach

- 3.12.1. In case of a system breach, Assumption Life must quickly inform concerned individuals of the breakdown according to the relevant regulations. When security has been breached and there is a potential danger that our clients', representatives' or employees' identities could be stolen, Assumption Life must take the necessary steps to mitigate this risk and, if the breach is significant, alert the Privacy Commissioner.
- 3.12.2. If someone has reason to believe that personal information has been lost, they must advise the Chief Compliance Officer immediately so that the appropriate measures can be taken. Employees are responsible for notifying their supervisors, who will inform the Chief Compliance Officer right away.

## **Privacy and Data Protection Policy**

### **3.13 Report**

- 3.13.1. The Chief Compliance Officer investigates when he or she receives a complaint or becomes aware of a security breach. The SCO reports to the vice president of the line of business involved and to the CEO and board of directors' audit committee.

## **4 RESPONSIBILITIES**

### **4.1 Management Team**

- 4.1.1. Adopts this policy.
- 4.1.2. Ensures compliance with the privacy protection policy.
- 4.1.3. Regularly reinforces the importance of having appropriate controls in place to apply the existing policy and procedures.
- 4.1.4. Designates a person who will be responsible for the privacy protection policy (Chief Compliance Officer).

### **4.2 Chief Compliance Officer**

- 4.2.1. Ensures compliance with the policy principles and procedures.
- 4.2.2. Takes care of any of Assumption Life's issues regarding personal information protection.
- 4.2.3. Receives complaints, studies them, conducts an investigation, makes desired recommendations, prepares a report and submits it to those concerned.
- 4.2.4. In the case of a security breach, investigates, ensures necessary follow-up and makes desired recommendations. Prepares a report and submits it to those concerned.
- 4.2.5. Keeps track of recommendations and submits progress reports to the vice president of the line of business involved, the CEO and the board of directors' audit committee.
- 4.2.6. Ensures that this policy is updated periodically.

### **4.3 Department Manager**

- 4.3.1. Ensures his or her department's compliance with policy principles.
- 4.3.2. Ensure that employees receive the training required to comply with this policy and resulting procedures.
- 4.3.3. Approves his or her department's procedures to comply with the principles of this policy.

### **4.4 Employees and Administrators**

- 4.4.1. Comply with this policy.
- 4.4.2. Inform managers of non-compliance with the privacy policy and procedures.