

## **Protecting Your Privacy**

### ***Your privacy***

At Canadian Direct Insurance, we respect your privacy and are committed to keeping personal information about you strictly between us. For the security of all of our customers, we have adopted our own Privacy Code which lists the principles of privacy we observe, and is available through our Call Centre at 1-888-225-5234 or our website at [www.canadiandirect.com](http://www.canadiandirect.com).

### ***Your consent***

We will not collect, use or disclose your personal information without your consent, except where required or permitted by law.

### ***What personal information do we need?***

Depending on the specific circumstances, Canadian Direct Insurance may collect personal information for administration of its insurance business including:

- Provision of insurance services, including underwriting, administering or servicing an insurance policy or dealing with a claim;
- Identification, checking, selection and management of intermediaries, including agents, brokers and adjusters;
- Recording and processing payments to customers, third parties or intermediaries;
- Analysis for management purposes; and
- Statutory reports.

In addition to the purposes outlined above, Canadian Direct Insurance may collect personal information for one or more of the following purposes:

- to meet legal and regulatory requirements;
- to compile statistics; or
- to assist in the prevention of crime, money laundering or terrorism and the detection, apprehension and prosecution of offenders.

As well, Canadian Direct Insurance may identify products or services of value to current, past and prospective customers and promote or sell such products and services, including by means of direct marketing. If you would prefer that we not use your personal information to inform you of other insurance products offered by Canadian Direct Insurance that may be of interest, please let us know.

Although Canadian Direct Insurance will collect personal information primarily from the individuals concerned, we may also, with the individual's consent, collect information from external sources such as credit reporting agencies, or insurers, brokers or agents, and underwriting and claims information networks identified to Canadian Direct Insurance for this purpose.

### ***To whom is personal information disclosed?***

There are situations specific to the insurance business where insurers will disclose personal information as dictated by prudent insurance practices:

#### **Risk-Sharing**

- As part of the underwriting and claims handling process, Canadian Direct Insurance transfers personal information to other insurance companies including reinsurance companies, which share or underwrite the risk.

#### **Information Services**

- Canadian Direct Insurance discloses personal information to government or industry databases for underwriting, claims, classification and rating purposes.

#### **Insurance Services**

- Canadian Direct Insurance discloses personal information to businesses that provide goods and services to us and our customers, such as loss control managers and claims adjusters.

#### **Insurance Intermediaries**

- Canadian Direct Insurance may disclose personal information to their insurance intermediaries, such as brokers and agents.

Only information necessary for these services will be provided by Canadian Direct Insurance to these service providers.

There are however, some exceptions. For example, we sometimes require services from suppliers and agents, such as reporting for legal or regulatory compliance; reporting for statistical compilation; market research and computer data-processing companies. Our customer lists are for Canadian Direct Insurance use only and we never sell or give lists to other companies.

For your information, all telephone calls to and from our Call Centres are recorded for quality assurance and as a record of the information exchanged.

In addition, the law permits us to disclose personal information to the authorities without an individual's consent to protect the public interest (e.g. to combat fraud or money laundering and terrorism) and to the courts to protect our business interests.

You may withdraw your consent to collection, use or disclosure at any time, subject to legal or contractual restrictions and reasonable notice. Canadian Direct

Insurance will inform the individual of the implications of such withdrawal of consent for the continued provision of insurance services.

### ***The 10 principles of our Privacy Code***

Canadian Direct Insurance has created a detailed Privacy Code, which lists the following 10 principles to ensure we respect the confidentiality of your personal information. A copy of this code is available by simply calling us at 1-888-225-5234 or through our website.

### ***Summary of Canadian Direct Insurance Ten Privacy Principles:***

#### **Principle 1 – Accountability**

Canadian Direct Insurance is responsible for all personal information under its control and its Privacy Officer is accountable for Canadian Direct Insurance compliance with the principles described in this Privacy Code.

#### **Principle 2 – Identifying the Purposes for Collecting Personal Information**

Canadian Direct Insurance will identify and document the purposes for which personal information is collected at or before the time the information is collected.

#### **Principle 3 – Consent**

Canadian Direct Insurance requires an individual's knowledge and consent (express or implied) for the collection, use or disclosure of personal information, except as otherwise required or permitted by law.

#### **Principle 4 – Limits to the Collection of Personal Information**

Canadian Direct Insurance will limit the amount and type of personal information collected to that which is appropriate and required for its purposes. It will collect personal information by fair and lawful means.

#### **Principle 5 – Limits to the Use, Disclosure and Retention of Personal Information**

Canadian Direct Insurance will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as required or permitted by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes, except as otherwise permitted or required by law.

#### **Principle 6 – Accuracy**

Canadian Direct Insurance will keep personal information as accurate, complete, and up-to-date as necessary for its purposes.

#### **Principle 7 – Safety and Security**

Canadian Direct Insurance will protect personal information with safeguards appropriate to the sensitivity of the information.

#### **Principle 8 – Openness**

Canadian Direct Insurance will be open about its policies and procedures regarding management of personal information.

Canadian Direct Insurance will ensure that individuals are reasonably able to acquire information about Canadian Direct Insurance policies and procedures and will make this information available in a form that is generally understandable.

#### **Principle 9 – Individual Access**

Upon request in writing, Canadian Direct Insurance will inform an individual of the existence, use, and disclosure of his or her personal information and will provide access to that information, except where the law requires or permits Canadian Direct Insurance to deny access.

#### **Principle 10 – Handling Inquiries and Challenges**

An individual will be able to direct a challenge concerning compliance with the above principles to Canadian Direct Insurance Privacy Officer.

#### ***What do I do if I have questions, concerns or complaints relating to privacy?***

If you have any questions, concerns or complaints about the way in which personal information is collected or used by Canadian Direct Insurance, please call our Call Centre at 1-888-225-5234. Alternatively, you can also write:

The Office of the Privacy Officer  
Canadian Direct Insurance  
Suite 600  
750 Cambie Street  
Vancouver, British Columbia, V6B 0A2  
Phone: 1-888-225-5234 (toll free)  
Facsimile: (604) 699-3851  
E-mail: [insurancegeneral@canadiandirect.com](mailto:insurancegeneral@canadiandirect.com)

#### ***What to do if you have a complaint or concern about privacy with Canadian Direct Insurance?***

We are committed to setting the highest customer service standards in the insurance services industry. We hope you will give us the opportunity to correct any situation that does not meet your expectations.

If you have any concerns about privacy and confidentiality, we want to know about them. All inquiries or concerns relating to personal information will receive prompt attention and be acknowledged within 5 business days.

#### ***Protecting Your Privacy***

At Canadian Direct Insurance, we respect your privacy and are committed to keeping personal information about you strictly between us. Write or call. Keep in touch and let us know what's on your mind. We're always ready to help you.