

IPC'S PERSONAL INFORMATION POLICY

The following Personal Information Policy spells out the responsibility of the IPC Group of Companies ("IPC", "we", "our", "us"), and your rights as our applicant, client, former client or claimant ("you" or "your"), regarding the collection, use and disclosure of your personal information.

WHAT IS "PERSONAL INFORMATION"?

"Personal information" is information about an identifiable individual but does not include the name, title or business address or telephone number of an employee of an organization.

HOW ARE WE ACCOUNTABLE?

IPC is responsible for your personal information in its possession or custody, including personal information that has been transferred to, or received from, a third party in the course of commercial activities for processing or other purposes for which you have consented.

COLLECTING, USING AND DISCLOSING YOUR PERSONAL INFORMATION

WHY DO WE DO IT?

We collect, use and disclose personal information in order to provide you with the products and services that will help you to meet all of your financial goals. Knowing you helps us to understand your wealth management needs, communicate effectively with you, and provide you with suitable services and products. Specifically, we collect, use and disclose your personal information to:

- verify your identity;
- determine your eligibility for IPC products and services, and for products that may be of interest to you from business partners with whom we have formed an association, and offering to you these products and services;
- analyze the suitability of our products or services for you;
- provide you with ongoing services, establish and maintain communications, and to respond to your inquiries;
- determine prices, fees and premiums;
- investigate and settle claims;
- detect and prevent fraud;
- compile statistics, conduct market research and report to regulatory and industry agencies;
- investigate specific transactions or patterns of transactions to detect unauthorized or illegal activities;
- comply with our legal and regulatory requirements

Personal information may be collected, used or disclosed for any of these "Identified Purposes" set out above. If your personal information is not needed for one of the Identified Purposes, we will not use or disclose it without obtaining additional consent from you.

HOW DO WE DO IT?

The collection, use and disclosure of your personal information depends on how you do business with us. We may gather information from the following sources:

- from you, on applications for our insurance, banking and investment products, or on other forms filled out through telephone, email or face-to-face interviews, such as your name, address, telephone number, email address, occupation, financial and banking information, and health information;
- from licensed agents, insurance brokers, intermediaries and financial services representatives with whom you have a relationship, as well as adjusters and inspectors;
- from your interactions with us, such as your transaction history and correspondence;
- from government and other entities, such as your claims history; or
- from consumer reporting agencies, such as your credit history.

If you provide personal information to us or through any of the above sources, you do so with the understanding that your personal information may be disclosed for the Identified Purposes amongst us, the above sources, or third parties and that IPC may verify such information, or obtain additional personal information about you by checking with government agencies, credit bureaus, and other fact collecting and verifying entities to assist us for the Identified Purposes.

CONSENT

Your knowledge and consent are required before we may collect, use or disclose your personal information, except in special circumstances, such as during a fraud investigation, an investigation by the police, or in situations otherwise permitted by the law. If any of the personal information that we collect is sensitive, such as health information, we will obtain additional written or oral consent from you before collecting, using or disclosing the information.

HOW DO YOU PROVIDE US WITH YOUR CONSENT?

We accept any of the following as your consent for IPC's existing use and future collection, use and disclosure of your personal information for the Identified Purposes:

- your receipt of this Personal Information Policy, unless you advise IPC, either orally or in writing, that you do not agree with the terms stated in this policy, and that you wish to opt out of all or portions of it;
- your unrestricted provision of information to IPC, either directly or through licensed agents, insurance brokers, adjusters or financial services representatives;
- your express written or oral consent as obtained through an application process; or
- your consent as provided by your authorized representative, such as a legal guardian or power of attorney.

In some circumstances, your consent may be implied. For instance:

- If you obtain products and/or services for your family or anyone else, you represent that you have obtained consent from them to the collection, use and disclosure of their personal information for the Identified Purposes, even though they might not be present during the application process.

- If you have existing products and services with us and you request amendments to them, it is assumed that the consent which you gave to us when buying the original products and services remains in effect.

HOW CAN YOU WITHDRAW YOUR CONSENT?

You may withdraw your consent at any time upon reasonable notice, subject to legal or contractual restrictions. Please note, however, that withdrawing your consent may affect our ability to continue to provide you with the products and services that you have or would like to receive.

To withdraw your consent, you should contact our Privacy Officer at the address or telephone number listed below. Unless we hear otherwise from you, you are giving to us your consent for the collection, use and disclosure of personal information as provided in this Policy for the Identified Purposes.

KEEPING AND PROTECTING YOUR PERSONAL INFORMATION

HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

Your personal information is retained only so long as we need it to effectively provide products and services to you, and for a reasonable length of time thereafter in case we need to meet any potential obligations or legal or government requirements. IPC shall use care when storing or destroying your personal information in order to prevent unauthorized access.

HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

Whether in electronic or paper-based format, IPC maintains strict security systems to safeguard your personal information from unauthorized access, disclosure or misuse. As well, when we no longer need your personal information, we take as much care to destroy it as we do when storing it.

In the event that we transfer your personal information to a third party for processing (for example, when printing cheques, managing claims and client statements, or for data processing), we require any person or organization providing products or services on our behalf to protect our customers' confidentiality in a manner consistent with our own internal measures, or as required by law.

YOUR RIGHT TO ACCESS YOUR PERSONAL INFORMATION

You have a right to access your personal information that we have in our possession or control. You also have a right to know which third parties have received your information from IPC.

In order to access your personal information, please make your request in writing to IPC's Privacy Officer, stating as specifically as possible which personal information you are requesting. We try to respond to such requests as soon as possible, and will advise you if for some reason we cannot respond right away. IPC may charge you a reasonable fee for providing access to your personal information, but only after first advising you of the approximate cost.

In providing you with a list of the organizations to whom we have disclosed any of your information, we will try to be as precise as possible. When it is not possible to provide an exact list of such organizations to which we have actually disclosed your personal information, IPC shall provide a list of organizations to which we may have disclosed the information.

IPC has the right to refuse your request for access to personal information if:

- the information is protected by solicitor-client privilege;
- granting access would reveal confidential commercial information;
- doing so would reasonably be expected to threaten the life or security of another individual;
- the information was collected for purposes related to the detection and prevention of fraud;
- the information was generated in the course of a formal dispute resolution process; or
- the information would likely reveal personal information about another individual.

KEEPING YOUR INFORMATION ACCURATE

IPC strives to ensure that the personal information we have on file for you is as accurate and up-to-date as necessary for the Identified Purposes for which it is to be used. If any information needs to be updated or amended to reflect a change in your situation, we make every effort to update our records. IPC shall amend personal information that is materially inaccurate or incomplete and, where appropriate, shall endeavour to advise other parties having access to the information in question.

HOW TO CONTACT US

Updated versions of this Personal Information Policy are posted on IPC's website at www.ipcc.ca, or you can direct any queries about the policy to IPC's Privacy Officer at the telephone, e-mail address, or mailing address listed below.

If you have a complaint related to the Personal Information Policy or any of our procedures, contact our Privacy Officer. If your complaint is justified, we will take the steps necessary to resolve the issue, including amending our policy and practices, if necessary.

If we are not able to resolve your concern, or if you have any other concerns about IPC's Personal Information Policy and procedures, you may contact the Office of the Privacy Commissioner of Canada or, if applicable, the provincial privacy commissioner. IPC's Privacy Officer will provide you with this contact information upon request.

For more information, to file a complaint, to make enquiries, or to opt out of all or parts of this Policy, please contact IPC's Privacy Officer:

IPC Privacy Officer
2680 Skymark Avenue, 7th Floor
Mississauga, Ontario L4W 5L6
Telephone 1-877-212-9799
Fax: (905) 212-7109

- > [Email](#)
- > [Website](#)