

# PROTECTING YOUR PRIVACY

**Marsh Canada Limited** and its subsidiaries (“Marsh”) provide insurance brokerage, risk management and related services to its corporate, association and individual clients (“Clients”).

## PRIVACY POLICY

**Marsh believes strongly in** protecting your privacy and the confidentiality of your Personal Information. We acknowledge that you may have privacy and security concerns with respect to the information we collect, use and disclose to third parties for the purpose of allowing us to provide and offer our products and services to you. In order to comply with privacy legislation, we have developed this Privacy Policy. Any personally identifiable information about a customer or prospective customer is considered Personal Information (“Personal Information”) and will be treated in accordance with this Privacy Policy.

## COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

Marsh Canada collects, uses and discloses your Personal Information (including individuals associated with you, all of whom are referred to as “you” in this Privacy Policy) only for the following purposes:

- Establishing and maintaining communications with you;
- Assisting you in the completion of your insurance application, the assessment of your eligibility for coverage, the processing and maintenance of your insurance coverage as well as the renewal of such coverage;
- Assisting you in connection with the analysis, assessment and underwriting of risks by actual and potential insurers;
- Responding to your inquiries about applications, accounts and other services;
- Making proposals for future insurance needs;
- Allowing our affiliated companies to notify you of certain products or services offered by our affiliated companies;
- Evaluating credit worthiness, monitoring, servicing and collecting your premium and fee payments;
- Processing transactions through data processing service providers;
- Receiving your credit card number to process credit card payments through third party payment processing, clearing and settlement systems in association with various banks;
- Sharing with associations for those clients/participants obtaining insurance coverage by being a member of the association;
- Sharing with financial institutions where we have joint marketing agreements;

- Updating information with credit bureaus;
- Meeting legal, security, processing and regulatory requirements;
- Assisting you in connection with investigations, the settlement and payment of claims, legal, valuation services and in the determination of your eligibility for benefits;
- Detecting (including surveillance) and preventing fraud, suspicious claims or other illegal activities; and
- Compiling statistics for analysis of our business.

## WHAT INFORMATION WE COLLECT

- Information you provide on applications or other forms, which may include your name, address, email address, age, personal identification numbers, credit card numbers, credit records, banking information, payment records, medical and health information, employment and income information;
- Information we acquire from and/or transfer to other persons (such as government agencies, industry associations, auditors, claims adjusters, your insurer and your employer, e.g., data from AUTOPLUS, data from the Insurance Bureau of Canada's Investigative Service's Division and police reports) to verify your identity and the accuracy of the information you have provided;
- Information about you received from Marsh affiliates, insurers, other intermediaries, third party providers and others for underwriting or claims purposes (such as previous insurance and claims history) about our Clients and Participants;
- Information we receive from consumer reporting agencies; and
- We may use various types of Web-based tools to collect personal information that may not be readily apparent to individuals and may include use of automatic tracking software, clickstream data, cookies and clear GIF files.

## DISCLOSURE OF INFORMATION TO OTHERS

We do not disclose any Personal Information about you to any third parties except as stated in this Privacy Policy and as otherwise permitted by law or authorized by you. We may share this information outside the company in order to process or complete the transaction for which the information was provided or as otherwise authorized by you.

Third parties to whom we disclose information are required by law and/or pursuant to contractual undertakings to keep your Personal Information confidential and secure and to use and disclose it only for purposes that a reasonable person would consider appropriate in the circumstances, in compliance with all applicable federal and provincial legislation, which purposes are as follows:

- To assess eligibility for coverage, process and maintain insurance coverage, renewal of coverage or related products and services—we disclose to the insurance companies, reinsurers, intermediaries or other brokers that make available the coverage;
- To associations for those Clients/Participants obtaining insurance coverage by being a member of the association;
- To notify you or allow our affiliated companies to notify you of certain products or services offered by our affiliated companies;
- For legal, claims settlement and valuation services;
- To update information with credit bureaus and insurance reporting agencies;
- To process transactions through data processing service providers;
- If the information is a credit card number, to process credit card payments—through third party payment processing, clearing and settlement systems in association with various banks; and
- To other financial institutions with whom we have joint marketing agreements.

If required or permitted to do so by law, we will disclose your Personal Information to third parties without obtaining your prior approval or providing you with notice thereof. In that connection, because a number of the service providers we use are located outside Canada, including certain Marsh affiliates, your Personal Information may be processed and stored outside Canada, and foreign governments, courts or law enforcement or regulatory agencies may be able to obtain disclosure of your Personal Information under foreign laws.

In this Privacy Policy, the purposes identified above and in "Collection, Use and Disclosure of Personal Information" will be referred to as the "Identified Purposes."

## CONSENT

Your knowledge of and consent to Marsh's collection, use and disclosure of your Personal Information is critical. We rely on the following actions by you as indications of your consent to our existing and future Personal Information practices:

- Your voluntary provision of Personal Information to us directly or through another insurance broker or representative or your employer for the purpose of acquiring an insurance contract or related service or product (including information previously provided to Marsh);
- Your express consent or acknowledgement contained within a written, verbal or electronic application or claims process; and
- Your verbal consent solicited by Marsh (or our agent) for a specified purpose.

Your consent may be given through your authorized representative such as a legal guardian, agent or holder of a power of attorney.

Subject to certain legal or contractual restrictions and reasonable notice, you may withdraw this consent at any time. Marsh will inform you of the consequences of withdrawing your consent. **In some cases, refusing to provide certain Personal Information or withdrawing consent for Marsh to collect, use or disclose your Personal Information could mean that we cannot obtain insurance coverage or other requested products, services or information for you.**

**If you wish to withdraw your consent please refer to the Questions or to Withdraw Consent section below.**

## LIMITING COLLECTION AND RETENTION OF PERSONAL INFORMATION

**Marsh** will only collect, use or disclose Personal Information that is necessary for the Identified Purposes or as permitted by law. If we require Personal Information for any other purpose, you will be notified of the new purpose, and subject to your consent, that new purpose will become an Identified Purpose.

Marsh will collect Personal Information only by fair and lawful means. We will retain Personal Information only as long as necessary for the fulfilment of the Identified Purposes.

## SAFEGUARDS

We restrict access within our organization to Personal Information about Clients and Participants to those employees of ours and our affiliates who need to know that information in order to provide products or services to our Clients and Participants. We have in place physical, electronic and procedural safeguards appropriate to the sensitivity of the information we maintain regarding Clients and Participants. Safeguards will vary depending on the sensitivity, format, location, amount, distribution and storage of the Personal Information. Marsh uses 128-bit secure socket layer ("SSL") encryption to provide its customers with confidence in transmitting Personal Information to Marsh.

## ACCURACY, ACCOUNTABILITY, OPENNESS AND CUSTOMER ACCESS

Our knowing about changes to some of your Personal Information (e.g. insured location address) may be key to providing continued coverage of insurance. **Please keep us informed of changes to your Personal Information.**

A copy of this Privacy Policy (and any significant changes) can be obtained from our Web site at [www.marsh.ca](http://www.marsh.ca). Marsh is responsible for all Personal Information under its control and has designated a Chief Privacy Officer who is accountable to Senior Management for Marsh's compliance with this Privacy Policy.

## QUESTIONS OR TO WITHDRAW CONSENT

To secure your Personal Information, Marsh does not provide online access to its customers to view or amend Personal Information in its database. You have the right to access your Personal Information and request rectification of any Personal Information in the file that may be obsolete, incomplete or incorrect.

If you have any questions about this Privacy Policy or want to access your Personal Information, you can obtain our *Personal Information Question/Request* form by writing or calling our Chief Privacy Officer at the following address or visiting the [www.marsh.ca](http://www.marsh.ca) Web site:

**Chief Privacy Officer  
Marsh Canada Limited  
120 BREMNER BOULEVARD, Suite 800,  
Toronto, Ontario M5J 0A8  
Phone: 1 888 468 0428 Fax: 416 815 3409  
Email: [Chiefprivacyofficer.canada@marsh.com](mailto:Chiefprivacyofficer.canada@marsh.com)**

Your Personal Information will be stored and can also be accessed at the Marsh office with which you do business. For a complete list of our offices, please visit our website at [www.marsh.ca](http://www.marsh.ca).

You may also withdraw your consent to any use or disclosure of your Personal Information (which may limit or terminate the products and services that Marsh provides to you) by writing or sending an email to us at the above address. We will need to validate the identity of anyone making such a request to ensure that we do not provide your information to anyone who does not have the right to such information.

Normally we will respond to access requests within 30 days.

## CHANGES TO THIS PRIVACY POLICY

If there is any significant change to this Privacy Policy, Marsh will post a notice of the change on its Web site.

## FILING A COMPLAINT

Please write to us at the address above or through our Web site to file a privacy complaint. Should we fail to resolve a complaint to your satisfaction or within a reasonable delay, you may contact the **Office of the Privacy Commissioner of Canada** during business hours at **1 800 282 1376** or at [www.privcom.gc.ca](http://www.privcom.gc.ca).