

The Protectors Group Personal Information Policy

This document is the complete version of the policy and describes how The Protectors Group collects, uses, discloses and protects personal information that you entrust to us.

About this document.

When you become a Protectors Group client and from time to time afterwards, you share important personal information with us. You do this so we can serve you and arrange the financial products that you find beneficial. Your trust is well placed and we honour that trust and respect your rights.

The Protectors Group is committed to offering you superior products and services. We are aware of the importance of privacy and note our methods of collecting, using and disclosing personal information is an important element of service.

This Personal Information Policy spells out 1) the responsibility of The Protectors Group and its associates and 2) your rights as our client, former client, applicant or claimant, regarding the collection, use and disclosure of your personal information.

The Protectors Group is an umbrella for the businesses operated independently by its associates. The associates have agreed to deal with privacy matters in accordance with this notice or notices that may supersede it. You may obtain a list of the associated entities on request.

The Protectors Group is subject to the Personal Information Protection and Electronic Documents Act – PIPEDA. We collect, use, protect and disclose information about you in ways that are reasonable in the context of the services we provide.

We understand the following specific items to be the important matters relating to privacy and in particular to The Personal Information Protection and Electronic Documents Act.

What is "personal information"?

"Personal information" is any information about an identifiable individual, but does not include the name, title or business address or telephone number of an employee of an organization. As you can understand, we hold quite a lot of your personal information.

What is an "identifiable individual?"

An identifiable individual is one that can be known from or whose identity can be inferred from the information available.

What information are we responsible for protecting?

The Protectors Group is responsible for protecting any of your personal information in its possession or custody, including personal information that has been transferred to, or received from a third party. A third party is anyone, or any entity, other than the Protectors Group and you. The Protectors Group routinely transfers information to and receives information from:

- Insurers to whom you have applied for coverage, submitted a claim or applied to amend the coverage or other terms of the contract
- Investment dealers, fund managers and other financial institution where we are acting as your agent to arrange investments.
- Both insurers and investment dealers when we are acting on your behalf to service product in place.
- In the course of planning activity your professional advisors and others that you prescribe

Why do we collect, use, hold and disclose personal information?

We collect, use, hold and disclose personal information to serve you better. As we know more about you, we are better able to assess your needs, recommend appropriate products and integrate financial plans and

The Protectors Group Personal Information Policy

products with your personal resources, goals and time frames. Knowing you better helps us communicate effectively with you and your professional advisors.

There are certain specific “Identified Purposes” for which we collect, use and disclose information.

- to authenticate your identity
- to understand, analyze and assess your financial situation
- to communicate with you and others you designate
- to make recommendations about your financial affairs that are in keeping with your resources, goals and time frames.
- to determine your eligibility for insurance and financial products and services.
- to determine and illustrate premiums, project values, prices and fees
- to service the products we have arranged for you including processing claims
- to comply with the “Money Laundering Act”
- to compile statistics,
- to conduct market research
- to determine the suitability of your investments
- to provide information for legal proceedings whether in progress or anticipated
- to comply with the law
- to comply with tax requirements
- to administer our businesses

From time to time, we survey clients, provide information that may be of interest to clients, and maintain our mailing lists. The purpose is to provide you with information of interest, invitations, newsletters and the like. You may opt out of these uses.

Personal information may be collected, used or disclosed for any of the general or specific "Identified Purposes" set out above.

How do we gather your personal information?

We collect information by fair and lawful means. The collection, use and disclosure of your personal information depend on how you do business with us. Collection methods include:

- from you during the “discovery” phase of our relationship
- from you, on applications for insurance and investment products,
- from your professional advisors
- from financial institutions.
- from your interactions with us (for example through your questions and concerns, underwriting and claims)

What you are committing to when you share personal information with us?

If you provide personal information to us, you do so with the understanding that your personal information may be used or disclosed for the Identified Purposes. Some third parties may verify information and/or collect more, but those activities will be disclosed, by them, in the course of applying for their products.

Your 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.

We rely on express consent from you to collect, use and disclose information.

The Protectors Group Personal Information Policy

How do you provide us with your consent?

You may provide several consents and forms of consent in the course of dealing with us. We accept any of the following as your consent for our existing use and future collection, use and disclosure of your personal information for the Identified Purposes:

- ❑ Your signed express consent as evidenced herein.
- ❑ Your consent as supplied to third party insurers or investment dealers or others during the application or planning process
- ❑ 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 insurance for your family, or anyone else, you represent that, even though they might not be present during the application process, you have obtained consent from them, to the collection, use and disclosure of their personal information for the Identified Purposes.
 - If you have an existing insurance policy that we arranged and you request or require service of it, we will assume that the original consent that you gave to us remains in effect.
 - For purposes of sending information, invitations and other items of potential interest unless you have indicated that you do not wish to receive them.

You may say “no” or you can withdraw your consent.

You may withdraw your consent at any time upon reasonable notice, subject to legal or contractual restrictions. After withdrawal we will be unable to collect, use or disclose information about you. Saying no or withdrawing your consent will affect our ability to provide, or continue to provide, you with products and services.

To withdraw your consent, you should contact our Privacy Officer at the address or telephone number shown below.

How long do we keep your personal information?

We retain your personal information only as long as we need it to provide products and advisory services to you and for a reasonable length of time thereafter.

How do we protect your personal information?

The Protectors Group uses appropriate care to prevent unauthorized access, copying, change or loss when collecting, storing, communicating or destroying your personal information.

Whether in electronic, paper-based or other format, The Protectors Group maintains appropriate security systems to safeguard your personal information from unauthorized access, disclosure, alteration, copying or misuse. When appropriate we will, use secure fax protocols, encrypted email and other secure methods to communicate with you and with third parties who act on your behalf. As well, when we no longer need your personal information, we will take as much care to destroy it as we do when storing it.

In the event that we transfer your personal information to third parties for processing (for example, when applying for insurance or investment products, managing claims and client statements), or to professionals for advice or services, we require such persons or organizations providing products or services on our behalf to protect your confidentiality in a manner consistent with our own internal measures, or as required by law.

Your right to access your personal information.

You are entitled to know about the existence of and, subject only to exceptions required by or permitted by law, the specific personal information that we have about you in our possession or under our control. You also have a right to know which third parties have received your information from The Protectors Group.

The Protectors Group Personal Information Policy

How do you access your personal information?

Please make your request in writing to The Protectors Group's Privacy Officer, stating as specifically as possible which personal information you are requesting. We provide a form for this and will assist you in completing it if that is necessary.

We will respond to requests in less than 30 days. The Protectors Group may charge you a reasonable fee for providing access to your personal information, but only where the cost to do so is more than nominal and after first advising you of the approximate cost to do so.

In providing you with a list of the organizations to which we have disclosed any of your information, we will be as precise as possible but reserve the right to provide you with generic lists.

The Protectors Group 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
- the information would likely reveal personal information about another individual
- The information was received from or disclosed to a government entity and they have refused our request to permit the disclosure

Keeping your information accurate.

The Protectors Group strives to ensure that the personal information we have on file about you is as accurate and up-to-date as necessary for the Identified Purposes for which we use and/or disclose it. The Protectors Group shall amend personal information that is materially inaccurate or incomplete and, where appropriate, we shall make reasonable efforts to advise other parties having access to the information in question.

If you have a complaint, we want to know about it.

If you have a complaint related your information, or any of our procedures and policies, contact our Privacy Officer.

If your complaint is justified, we will take the steps necessary to resolve the issue, including amending information, and /or our policy and practices.

If we are not able to resolve your concern, you may contact the Office of the Privacy Commissioner of Canada or, if applicable, the provincial Privacy Commissioner. The Protectors Group's Privacy Officer will provide you with this contact information.

How to contact us.

Updated versions of this Personal Information Policy are posted on The Protectors Group website at www.protectorsgroup.com. You may direct any queries about this policy to The Protectors Group's Privacy Officer.

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

Privacy Officer, The Protectors Group

885 Clonsilla Avenue, Suite A

Peterborough, Ontario, K9J 5Y2

Telephone : 705-748-5181

Fax : 705-748-4831

E-mail: privacy@protectorsgroup.com,

Internet: www.protectorsgroup.com