

# Privacy Policy

Westland Insurance Group Ltd. is committed to protecting your privacy and the confidentiality of your personal information by complying with the laws and regulations under applicable privacy laws in all Provinces in Canada, including the Personal Information Protection Act and the Personal Information Protection and Electronic Documents Act. Any personally identifiable information about our customers is considered personal information (“Personal Information”) and will be treated in accordance with this Privacy Policy and applicable privacy legislation. We will identify the purposes for which we will be collecting, using, and disclosing your personal information and obtain your consent prior to doing so. You may provide your consent to us either orally or in writing. Upon your written request, we will make available any specific personal information we have collected, utilized, or disclosed, to the extent permitted by law.

## Identified Purposes of the Use of Your Personal Information

Westland Insurance Group Ltd. generally uses personal information to manage and administer our business, including to understand your insurance needs, communicate with you effectively and to provide you with the products and services you request. For example, we may use your personal information to:

- determine your eligibility for, offer and/or provide you with insurance products and services that you request;
- evaluate credit worthiness and monitor, collect premiums and fees;
- verify your identity;
- determine prices, fees and premiums including by evaluating your coverage needs and assessing risk;
- maintain, administer, collect, service and renew your account(s) and assess your ongoing needs for insurance products and services;
- investigate and settle claims;
- determine your eligibility for and offer and provide other products or services that may be of interest to you, such as investment or retirement products or group benefits, unless you ask us not to;
- detect and protect against error or fraud;
- compile statistics and conduct market research;
- maintain business records for reasonable periods;
- meet legal, regulatory, self-regulatory, insurance, security and processing requirements; and
- otherwise with consent or as permitted or required by law.

In some cases, refusing to provide certain Personal Information or withdrawing consent for Westland Insurance Group Ltd. to collect, use or disclose your Personal Information could

mean that we cannot provide you with insurance coverage or other requested products, services or information.

## Limiting Collection, Retention and Disclosure of Personal Information

Westland Insurance Group Ltd. will only collect, use or disclose Personal Information that is necessary for the Identified Purposes or as required 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. Westland Insurance Group Ltd. will only collect Personal Information by fair and lawful means. We will retain Personal Information only as long as necessary for the fulfillment of the Identified Purposes.

**Disclosure to Affiliates.** Personal information may be disclosed to our affiliates (including outside of Canada) for internal audit, management, billing or administrative purposes. We may also disclose personal information to our affiliates so that they may send you information about their products and services. However, if you do not want your personal information disclosed for these marketing purposes, you may contact us at any time as described further below.

**Service Providers.** Westland Insurance Group Ltd may transfer personal information to outside agents or service providers (including affiliates of Westland acting in this capacity) that perform services on our behalf. The services that may be performed by our agents or service providers consist of data processing, data warehousing or administrative services, or otherwise to collect, use, disclose, store or process personal information on our behalf for the purposes described in this Privacy Statement. Some of these service providers or affiliates may be located outside of Canada, including specifically in the United States and the United Kingdom, and your personal information may be collected, used, disclosed, stored and processed in the United States or elsewhere outside of Canada for the purposes described in this Privacy Statement. Reasonable contractual or other measures we may take to protect your personal information while processed or handled by these service providers are subject to legal requirements in Canada, the United States and other foreign countries applicable to our affiliates, agents and service providers, for example lawful requirements to disclose personal information to government authorities in those countries.

**Business Transactions.** Personal information may be used by Westland Insurance Group Ltd and disclosed to parties connected with the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of Westland Insurance Group Ltd or our business or assets, for the purposes of evaluating and/or performing the proposed transaction. These purposes may include, as examples:

- Permitting those parties to determine whether to proceed or continue with the transaction; and fulfilling reporting, inspection or audit requirements or obligations to those parties.

- Assignees or successors of Westland Insurance Group Ltd. or our business or assets may use and disclose your personal information for similar purposes as those described in this Privacy Statement.

### **Limited Sharing of Your Personal Information To:**

- Operators of insurance industry databases for the purpose of verifying the application information you submit;
- Your insurance broker for the purpose of your broker providing services to you,
- Independent insurance adjusters and brokers for the purpose of obtaining assistance in processing and administering your claims;
- Governmental authorities, claims investigation service providers, medical organizations, other vendors, other insurance carriers, re-insurers, and regulatory organizations for the purpose of assisting in the investigation and processing of claims;
- Other persons for whom you have provided your consent, for the purposes, and;
- As otherwise permitted or required by law.

## **Consent**

Your knowledge and consent of Westland Insurance Group Ltd.'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 directly to Westland Insurance Group Ltd. through one of our representatives for the purpose of acquiring an insurance contract or related service or product (including information previously provided to Westland Insurance Group Ltd.);
- Your express consent or acknowledgment contained within a written, verbal or electronic application process;
- Your consent solicited by Westland Insurance Group Ltd. for a specified purpose;
- Your receipt of this Privacy Policy, until you notify Westland Insurance Group Ltd. of a withdrawal of this consent;
- Your consent given through your authorized representative such as a legal guardian, agent or holder of a power of attorney; or
- If you make changes to your policy or when your policy automatically renews, it is inferred that any consent you have previously provided to us relative to your policy remains in effect unless the consent is otherwise withdrawn.

Subject to certain legal or contractual restrictions and reasonable notice, you may withdraw this consent at any time. Westland Insurance Group Ltd. will inform you of the consequences of withdrawing your consent.

## **Accuracy**

Westland Insurance Group Ltd. will maintain your Personal Information as accurate, complete, and up-to-date as is necessary for the Identified Purposes.

## Requesting Data Deletion

You may make a request that we delete certain Personal Information we hold about you. To do so, please send your request to [privacyofficer@westlandinsurance.ca](mailto:privacyofficer@westlandinsurance.ca). We may not be able to assist in all cases. Deletion of your data will also be subject to legal, regulatory and contractual considerations. Deletion of your data may also mean that we cannot provide you with insurance coverage or other requested products, services or information.

## Safeguards

Westland Insurance Group Ltd. will protect your Personal Information by security safeguards appropriate to the sensitivity of the information. We do this by implementing physical, organizational, contractual, and technological security measures to protect your personal information from loss or theft, unauthorized access, disclosure, copying, and use or modification.

## Accountability, Openness and Customer Access

Westland Insurance Group Ltd. is responsible for all Personal Information under its control and has designated a Privacy Officer who is accountable to Senior Management for Westland Insurance Group Ltd.'s compliance with this Privacy Policy.

## Challenging Compliance

If you have any questions, comments, concerns or requests pertaining to our privacy policy, please contact our Privacy Officer at:

Privacy Officer

Westland Insurance Group Ltd.

1500-9850 King George Blvd, Surrey, BC, Canada, V4A 9R3

If you are not satisfied with Westland Insurance Group Ltd.'s response to a privacy related inquiry or complaint you may contact the office of the Privacy Commissioner of Canada during business hours at 1-800-282-1376 or at [www.priv.gc.ca](http://www.priv.gc.ca). Alternatively, you can contact our privacy officer directly [here](#).