



Access Insurance Privacy Policy

Introduction

Access Insurance Group ("Access Insurance") is obligated to protect the personal information provided by its employees, clients and other third parties in accordance with the Alberta *Personal Information Protection Act* ("PIPA") and other applicable provincial, federal, and international privacy laws. Access Insurance collects, uses, and discloses personal information for the purposes of enabling us to assist our clients with the acquisition, renewal and management of insurance policies.

Definitions

Client means an individual who engages an employee, representative, or officer of Access Insurance to acquire, renew, or manage an existing or new policy of insurance.

Personal information means the information about an identifiable individual. Examples of personal information include names, phone numbers, health, financial, and employment information. Contact information of an employee of an organization is usually not considered to be personal information if those details are publically available or used primarily for the purposes of business communications.

Personal Employee Information is personal information of an individual reasonably required by an organization to establish, manage, or terminate an employment or volunteer-work relationship. Personal Employee Information also includes personal information of an individual reasonably required by an organization to manage a post-employment or post-volunteer-work relationship.

Privacy Officer is the person(s) appointed by Access Insurance to be responsible for compliance with this Privacy Policy and any other privacy policies, procedures and legislation applicable to Access Insurance.

1. Accountability

1.1 Access Insurance will appoint a suitable person to act in the role of Privacy Officer to ensure the organization's compliance to privacy policies, procedures and legislation. The following is the contact information of our Privacy Officer:

Nora Reead
Access Insurance
4435 99 Street NW
Edmonton, AB T6E 5B6
Phone : 780.989.7327
Fax : 780.989.7337
Email : nora@accessinsurancegroup.com

1.2 Access Insurance is committed to :

- Protecting personal information within its custody or under its control by making reasonable security arrangements;
- Allowing individuals to seek access and corrections to their personal information as permitted by law;
- Train and educate its staff on proper personal information handling practices; and
- Develop information which clarifies those practices to the public.

1.3 In the event that Access Insurance engages the services of third party service provider, we will be responsible for the service provider's compliance with PIPA. We will also take reasonable contractual steps to ensure that third party service providers to whom we may disclose personal information will provide a level of personal information protection comparable to ours.

2. Identifying Purposes

2.1 Access Insurance is responsible for identifying the purposes for which personal information is being collected. Notification will be provided before or at the time of collection in writing or orally, and reference may be made to this Privacy Policy or other information posted on our website at www.accessinsurancegroup.com.

2.2 Personal information may be collected in a variety of ways, including in writing, in person, through telephone, or other electronic means.

2.3 Access Insurance will collect personal information for a variety of reasons, including but not limited to the following reasons:

- To assist a Client with the acquisition, renewal, or management of an insurance policy;
- To assess a Client's ongoing needs for insurance;
- To assess a Client's need and interest for other services and products; and
- To ensure that Client information is accurate and updated.

3. Consent

3.1 Access Insurance will obtain consent from individuals for the collection, use, or disclosure of their personal information, except where an exception or exemption is provided by law.

3.2 Consent for the collection, disclosure, or use of personal information may be provided explicitly in writing or orally. In certain circumstances as permitted by law, consent may also be deemed or implied.

3.3 When written consent is provided, the Client may be provided with a paper copy consent form or an electronic form to complete. Oral consent may be obtained over the telephone or in person. In such circumstances, the individual obtaining consent on behalf of Access Insurance will usually document the consent in written form once it is obtained.

3.4 Consent can be withdrawn or varied by a Client upon the provision of reasonable notice to us, and we encourage this to be done in writing. Failure to provide consent or the withdrawal of consent may result in our inability to assist the client with the acquisition, renewal, cancellation or management of a policy.

3.5 When we intend to use or disclose personal information for a different purpose than when the personal information was first collected, we will generally seek new consent from the individual to whom the information belongs to.

3.6 Access Insurance may collect, use, or disclose Personal Employee Information of its employees or potential employees, without consent, where permissible by law. Personal Employee Information of the employees of Access Insurance are primarily used for internal use. There may be times where Access Insurance will need to disclose Personal Employee Information to a third party, like a payroll administrator or benefit supplier for the administration of payroll and benefits.

4. Limiting Collection

4.1 Access Insurance will only collect personal information to the extent necessary for meeting the purposes for which the information is collected. We will make reasonable efforts to avoid the collection of information that is not needed to fulfill a specified purpose.

4.2 Access Insurance will strive to collect personal information directly from the person to whom the information belongs to unless permitted otherwise by law.

5. Limiting the Use, Disclosure, and Retention

- 5.1 Access Insurance will not use or disclose personal information for any other purpose except those identified when the information was initially collected, or where permitted by law. There may be some circumstances where consent is not required, for example, to respond to an emergency or where the use or disclosure is required by a statute of Alberta or Canada.
- 5.2 Access Insurance may disclose personal information to other third parties in certain circumstances to properly handle a Client matter. At times we may also be required to transfer or store personal information to international locations in the course of business. For example, Access Insurance may rely on third party service providers located outside of Canada to provide data storage services. While Access Insurance makes efforts to protect personal information, the personal information may be accessed by the courts, law enforcement and other national security authorities based out of those foreign jurisdictions.
- 5.3 Access Insurance will retain personal information for a period of time reasonably required to fulfill its business and legal obligations. Industry standards will be considered to determine the length of retention. Once the retention period has elapsed, Access Insurance shall destroy, erase, or deidentify the personal information that is not required to fulfill its business or legal obligations.

6. Accuracy

- 6.1 Access Insurance will aim to ensure any personal information that is collected, used or disclosed will be as accurate and complete to the extent that is reasonable for the purposes of the collection, use and disclosure. Individuals are encouraged to provide us with their personal information in an accurate and complete manner, and to provide updates on changes to this information as soon as reasonably possible. Accuracy and completeness of personal information is required for us to continue to provide reliable services to our Clients.
- 6.2 We aim at reducing the likelihood that incorrect personal information is collected, used or disclosed by:
- Collecting personal information from the individual directly wherever possible;
 - Processing updates and corrections to personal information without unreasonable delay; and
 - Verifying accuracy of personal information through third parties where permitted by law (e.g., motor vehicle and driver licensing authorities, etc.).

7. Safeguard

- 7.1 Access Insurance will protect the security of personal information under our control against unauthorized access, collection, use, disclosure, copying, modification, disposal or destruction, in a manner that is appropriate to the sensitivity of the information.
- 7.2 Access Insurance will employ the following methods to safeguard personal information:
- Physical methods, including locking filing cabinets and limiting physical access personal information stored as paper copies;
 - Organizational approaches, including security authorizations and limited access on a basis of “need-to-know”; and
 - Technological approaches, including the use of secure website transactions, encryption, and passwords.
- 7.3 We will make sure that our policies and procedures relating to the protection of personal information are plainly explained and available to all our staffs.
- 7.4 We will be cautious when disposing or destroying personal information to avoid unauthorized parties from getting access to the information after being disposed of. Such processes include shredding papers before the recycling process; and deleting electronically saved information once record retention periods have elapsed.
- 7.5 In the event that there has been an incident involving the loss of, unauthorized access to, or disclosure of personal information (the “breach”), Access Insurance will assess the risk of harm to the individual to whom the information belongs to. Where there is a real risk of significant harm, Access Insurance may be obligated to notify the appropriate Information and Privacy Commissioner. We will also notify the individuals directly affected by the breach, as appropriate in the circumstances.

8. Openness

8.1 Access Insurance will make it possible for individuals to access our policies and procedures in relation to our information handling practices. Our Privacy Officer will be in a position to answer questions about our policies and procedures.

8.2 We may choose to make information about our policies and procedures accessible in various ways, including:

- Making this Privacy Policy available on our website;
- Sending out additional information through paper or electronic correspondence; and
- Uploading other policies, procedures, and information on our website at www.accessinsurancegroup.com.

9. Individual Access

9.1 Individuals are able to make a request in writing to Access Insurance to:

- Provide the individual with access to personal information about the individual under the custody or under the control of Access Insurance.
- Provide the individual with information about how their personal information is being used and disclosed by Access Insurance.

9.2 All access requests should be made in writing using the *Request/Complaint Form* and sent to Nora Reead by email: nora@accessinsurancegroup.com, fax: (780) 989-7337, or regular mail:

Access Insurance
4435 99 Street NW
Edmonton, AB T6E 5B6

9.3 Upon receipt of the written request Access Insurance will make every reasonable effort to assist the individual seeking access to information.

9.4 An access request may be denied for a number of reasons, including:

- The information is protected by legal privilege;
- The information would reveal confidential information that is of a commercial nature and is not unreasonable to withhold that information; and
- The information was collected for an investigation or legal proceeding.

9.5 In relation to access requests for personal information, Access Insurance will notify the individual as to whether Access Insurance has custody or control of their personal information, and whether the individual will be provided access to the personal information. If access is refused, reasons for the refusal will be provided. If access is granted, Access Insurance will notify the individual of how access will be granted. Access may be provided electronically, by paper copy or through another means as permitted by law. Reasonable fees may also be charged to the individual in accordance with PIPA or other applicable legislation and regulations.

9.6 In relation to an access request about how personal information is being used or disclosed by Access Insurance, Access Insurance will provide the individual with information about the purposes for which the personal information is being used and the names of the persons to whom, and the circumstances in which personal information is being disclosed. If Access Insurance is refusing to provide this information, Access Insurance will provide the name of an individual who can answer questions about the refusal on their behalf.

10. Challenging Compliance

10.1 Our Privacy Officer will be available to respond to any concerns an individual may have concerning Access Insurance's compliance with this Privacy Policy. We will make efforts to resolve any concerns informally to the satisfaction of all parties.

10.2 In the event that we are unable to resolve a complaint, the Complainant may be referred to the Alberta Office of the Information and Privacy Commissioner (the "OIPC"). The OIPC oversees the administration and enforcement of Alberta's privacy legislation, including PIPA. For more information, please visit www.oipc.ab.ca.