

## Privacy Policy

### **OUR COMMITMENT TO PROTECTING YOUR PRIVACY**

Collecting personal information about you is essential to our ability to offer you high-quality insurance and financial products and services and to provide you with on-going services relating to your financial needs throughout your lifetime.

Protecting your privacy has always been paramount among our business principles. CUMIS is committed to protecting the privacy, confidentiality, accuracy and security of your personal information. Wherever we collect, use, retain or disclose your personal information in the course of conducting business, our focus is your privacy.

### **WHAT PERSONAL INFORMATION DO WE COLLECT**

In order to provide you with requested products and services, we require specific personal information. That information we need varies depending on the product or service you request. "Personal information", as defined in federal and provincial privacy laws, is information — whether written, electronic or oral — about an identifiable individual and includes, but is not limited to, the following:

- name, address and telephone number
- age, gender, family and marital status
- driving record
- previous insurance and claims experience
- medical and health information
- employment information (including occupation and income)
- banking information, credit rating, payment records
- driver's license or social insurance number, (where required by law)
- assets and liabilities

As you would expect, we do not collect all of this information every time we deal with you. We only collect what we need, when we need it, in order to provide you with the products or services you have requested.

### **WHY WE COLLECT YOUR PERSONAL INFORMATION**

During the course of our relationship with you, CUMIS may collect, use and disclose your personal information to:

- identify you
- understand your financial services needs
- confirm your application information and assess your eligibility for products and services
- provide you with ongoing services, establish and maintain communication, and respond to your inquiries
- advise credit unions in the administration of your product(s) and/or service(s)
- investigate and settle your claims, and determine your eligibility for benefits
- offer you products and services, and provide information that may be of interest to you
- promote products or services to you from business partners with whom we have formed an association

- meet legal and regulatory requirements
- share and exchange within our group of companies, with your agent, broker, plan administrator, sales representative, other insurers, insurance reporting agencies, credit bureaus and/or any other person or organization, as may be reasonably required for the purposes already stated

In understanding “what?” and “why?” personal information is collected and used, you can take comfort in knowing that our use of your personal information is always in a manner consistent with applicable laws. Should CUMIS need to use your information for purposes other than those already listed, we will explain the purpose to you and obtain your consent - before we use it. Also, please note that:

- we do not collect, use or disclose your personal information without your consent, except where required or permitted by law
- we do not share your health information without your express consent
- we do not sell your personal information

Maintaining the security of your personal information is a top priority at CUMIS. Only authorized personnel have access to your information and our systems and procedures are designed to prevent the loss, misuse, unauthorized access, disclosure, alteration, or destruction of your information. We retain your information only as long as is required for the purposes for which it was collected and for any legal or regulatory requirements.

## **YOUR RIGHTS AND CHOICES ABOUT YOUR PERSONAL INFORMATION**

As a valued customer of CUMIS, you have the right to access your personal information and request changes at any time. It is your legal right to choose not to provide us with some or all of your personal information, or to deny us the use or disclosure of your information for certain purposes. Should you exercise this right, we will not unreasonably withhold requested products or services; however, certain information must be provided in order to supply the requested products or services. By providing your consent for us to collect, use and disclose your personal information, we can better provide you with personalized products and services, information and advice. This may include, but is not limited to, special product offers, contests, community events, discounts, and new products and services.

Also, please take note that CUMIS has entered into service provider and data processing arrangements with companies located in Canada and the United States. As a result, your personal information may be stored or processed in either country, and that under applicable law, governments, courts, law enforcement, or regulatory agencies may, by lawful order, obtain disclosure of your personal information. Regardless of where data is processed, we are committed to maintaining the privacy and security of your personal information.

## **LIMITING THE USE OF YOUR PERSONAL INFORMATION**

If at any time you would prefer not to receive further information about our products and services and, instead, are content to limit the use of your personal information by CUMIS to administering the products or services you currently have with us, please let us know by sending us an e-mail, a letter or by giving us a call at our toll free number.

However, if we do not hear otherwise from you, we will assume that you wish to continue to receive further product and services information. If so, CUMIS will handle your personal information in a manner consistent with applicable laws and this Privacy Policy.

## PRIVACY PRINCIPLES

This Privacy Policy and our privacy practices are guided by the following principles:

- **ACCOUNTABILITY:** We have designated a CUMIS Privacy Officer who is accountable for our compliance with this Privacy Policy, which will be reviewed periodically to ensure compliance with applicable laws and relevance to the businesses of CUMIS. Each employee, office or agent of CUMIS is responsible for personal information under his or her control and each CUMIS business unit shall designate an individual or individuals to be accountable for compliance with this Privacy Policy.
- **IDENTIFYING PURPOSES:** The purposes for which personal information is collected shall be identified before or at the time the information is collected.
- **CONSENT:** The prior knowledge and permission of the individual are required for the collection, use or disclosure of personal information, except for legal or security reasons.
- **LIMITING COLLECTION:** The collection of personal information shall be limited to that which is necessary for the purposes identified. Personal information shall be collected by fair and lawful means.
- **LIMITING USE, DISCLOSURE, AND RETENTION:** Personal information will not be used, disclosed or retained for purposes other than those for which the information was collected, except with the permission of the individual, or as permitted or required by law.
- **ACCURACY:** Personal information shall be as accurate, complete and current as is necessary for the identified purposes for which it is to be used.
- **SAFEGUARDS:** Personal information will be protected by safeguards appropriate to the sensitivity of the information.
- **OPENNESS:** We will make specific, plain-language information readily available to you about our personal information policies and practices.
- **INDIVIDUAL ACCESS:** Upon your written request, we will give you access to the existence, use, and disclosure of your information. You are entitled to question its accuracy and completeness, and you can request changes to ensure accuracy.
- **CHALLENGING COMPLIANCE:** You are entitled to question the CUMIS Privacy Officer on our compliance with these principles.

## RESPONSIBILITIES

Our Chief Privacy Officer and the CUMIS business unit privacy officers are responsible for ensuring compliance with this Privacy Policy and for reporting instances of non-compliance to senior CUMIS management and the CUMIS Board of Directors.

Our Chief Privacy Officer can be reached at [privacy.officer@cumis.com](mailto:privacy.officer@cumis.com) or at 1-800-263-9120.