

Privacy Notice.

1. Protecting Your Private Information

At Simply Benefits and our affiliated companies, we prioritize safeguarding the personal information you share with us. Our commitment involves regularly reviewing and updating our procedures to ensure they meet stringent privacy and personal information management standards.

2. How we protect you and your personal information

2.1. Guiding Principles for Protecting Your Privacy

- ❖ **Security:** Simply Benefits is built on technology which sets the standard for security in our digital world, employing industry-leading safeguards to stay ahead of the challenge.
- ❖ **Responsibility:** Our team members, partners, and financial advisors are required to adhere to our privacy protocols. The Chief Privacy Officer is responsible for ensuring compliance and keeping our practices current.
- ❖ **Rights:** Canadians have rights related to personal information we collect and hold about you. You may exercise your rights at any time.
- ❖ **Transparency:** We offer comprehensive details regarding our privacy protocols.

2.2. We collect only the essential personal information required

Who do we gather your personal information from?

Your personal information is mainly obtained directly from you. However, in certain situations and depending on the products or services you use, we might also gather information from external sources. For example:

- ❖ Your employer
- ❖ Public bodies
- ❖ Our representatives
- ❖ Personal references
- ❖ Credit bureaus and reporting agencies
- ❖ Other insurers, reinsurers or financial institutions
- ❖ Public and private insurance, fraud and claims databases
- ❖ Partners who distribute our products and services, such as independent brokers, specialized insurance coverage providers, travel agencies or car dealerships

It's also important to note that someone seeking or already using our product or service might share your personal information with us, enabling you to gain from that product or service. For instance, they could include you as an insured individual.

How do we collect your personal information?

- ❖ We may collect your personal information in a number of ways, including:
- ❖ By phone
- ❖ In person
- ❖ Via our paper and online forms
- ❖ Via cookies, when you visit our websites

What personal information do we collect?

We only collect the personal information necessary to fulfill the purposes outlined in this notice. Here are some examples of personal information we may collect.

Categories	Examples
Identification Information	Name, date of birth, postal address, email, phone number, marital status, government identification, citizenship
Employment Information	Employment status, salary, current employer, employee identification number
Financial Information	Income, salary, information on financial products you have with us, EFT information
Health Information	Medical records, medical information related to your claims, paramedical test results, medical history.
Information about your family	Name, age, financial situation and health status of your spouse, children or parents
Insurance Information	Information on insurance policies you have with us or elsewhere, claims history, sex at birth, lifestyle habits, criminal record

We may also create or infer information from the personal information we collect. For example, we may create a client profile or identifier for you. This information is considered personal information. We manage and protect it in accordance with the same practices as the rest of your personal information.

2.3. We collect your personal information for specific purposes

We exclusively gather, utilize, disclose, and keep your personal information for the purposes specified in this notice. You will be notified of these purposes before or at the moment we collect your personal information.

Depending on the products and services you choose, the following purposes could be crucial to our interaction with you:

Categories	Specific Purposes
Underwriting Risk Assessment	To assess the risk associated with providing insurance coverage, we collect detailed information about applicants. This helps us determine eligibility and pricing.
Policy Administration	Personal information is used to manage and administer policies, including issuing policies, processing renewals, and handling billing and payments.
Claims Processing	When a claim is made, we need extensive information to investigate, assess, and settle the claim. This might include medical records, receipts, and other relevant data collected from you, providers or public and private insurance, fraud and claims databases.
Customer Service	Contact information and preferences enable us to provide ongoing service, support, and communication related to policies, benefits, and offers.
Fraud Prevention	We may use personal information to detect and prevent fraudulent activities, such as false claims or identity theft.
Marketing and Product Development	We use customer information to develop, offer, and promote products or services that might be of interest.
Legal and Regulatory Compliance	We are subject to various legal and regulatory requirements to prevent illegal activities such as money laundering and cyber threats, and must collect and retain certain information to comply with those obligations.
Health and Life Insurance Specifics	For life and health insurance, detailed medical information may be collected to assess risk, including pre-existing conditions, lifestyle habits (like smoker status), family medical history, etc.
Financial Planning and Investment	For insurance products related to investment and financial planning, Simply Benefits or its partners may require detailed financial information to provide appropriate advice and products.

Certain purposes are not mandatory for engaging in business with us. You can consent to them to benefit from a distinctive client experience and to obtain offers tailored to your needs.

We acknowledge that we must obtain your consent to collect, use, disclose and retain your personal information for the following purposes:

Categories	Specific Purposes
<p>Improve our products and services and provide a distinctive client experience</p>	<ul style="list-style-type: none"> ❖ Acknowledge your differences and similarities with respect to our other clients ❖ Understand how our digital tools and websites are used in order to improve them ❖ Consult with you to gain more insight into your experience, reactions and interactions with us ❖ Keep up with the various stages of your life to make our products and services even more useful and effective over the course of our relationship with you ❖ Allow all our clients to benefit from the lessons gleaned from you as we work to improve our client experience ❖ Make it easier for you to enter your information when requesting a product or service (ex: automatically fill in certain fields)
<p>Keep you informed of our promotions, products, services, contests and events that may be of interest to you</p>	<ul style="list-style-type: none"> ❖ Understand the product and services portfolio you have with Simply Benefits in order to offer you relevant products and services that are adapted to your reality ❖ Contact you at the right time, in the right way ❖ Offer you benefits or advantageous pricing based on the products or services you have with Simply Benefits ❖ Keep you informed of contests or other promotional events that may be of interest to you

2.4. We may share your personal information with other individuals or organizations

Who might we share your personal information with?

In order to fulfill the purposes outlined in this notice, we may sometimes need to share your personal information with other individuals or organizations.

For example, we may share it with:

- ❖ Your financial services advisor
- ❖ A person who has a product or service with us from which you are benefitting
- ❖ Credit bureaus and reporting agencies, such as Equifax or TransUnion
- ❖ Public and private insurance, fraud and claims databases
- ❖ Public bodies such as health care institutions
- ❖ Other insurers, reinsurers and financial institutions
- ❖ Your employer, union or association
- ❖ Partners who distribute our products and services, such as independent brokers, general agents, specialized insurance coverage providers
- ❖ Suppliers, for example of document printing, delivery or data storage services
- ❖ Courts, regulatory authorities or self-regulatory organizations
- ❖ Fraud prevention and management organizations, for example, law enforcement agencies

We may disclose your personal information outside of Canada

Your personal information is mainly stored within Canada, yet there are instances where we might share it with entities in other countries, such as when engaging with an international supplier. In these situations, we make sure through contractual agreements that these suppliers adhere to our standards for handling and safeguarding your personal information. We always ensure your information receives adequate protection before transferring it outside of Canada. Additionally, your personal information may be shared with entities within other Canadian provinces or territories.

2.5. We obtain your consent, except in certain cases prescribed by law

When do we obtain your consent?

We obtain your consent before we collect, use or disclose your personal information. We may obtain consent directly from you. It may also be obtained from another person, such as your financial services advisor, employer, car dealer, etc.

We will request your consent again if we wish to use or disclose your personal information for a purpose to which you have not consented.

When do we not request your consent?

In some cases, the law permits us to collect, use or disclose your personal information without your consent. Here are a few examples:

- ❖ Disclosing your personal information to suppliers for a purpose outlined in this notice, to provide you with the requested product or service
- ❖ Conduct statistical studies using de-identified personal information, where permitted by law
- ❖ Take appropriate action if we detect potential fraud
- ❖ In Quebec only: Using your personal information if it is clearly for your benefit or for purposes related to those to which you have already agreed
- ❖ Outside of Quebec: Using or disclosing your personal information if it is clearly for your benefit and we are unable to obtain your consent

We may also be required by law to disclose personal information. For example, if ordered by a court or requested by a regulatory authority or a self-regulatory organization.

2.6. We are doing everything we can to protect your personal information

Our team members, representatives, and stakeholders are dedicated to safeguarding your personal information. Our internal policies explicitly outline the duties and responsibilities of employees, representatives, and stakeholders in handling personal information. We begin educating our employees about this responsibility on their very first day and maintain a constant program to facilitate attention and respect to these policies.

We limit access to and use of your personal information

We keep access to your personal information to a minimum. Access to your personal information is restricted to those who need it to perform their duties.

Here are some of the measures in place to control access to and use of your personal information:

- ❖ We train our employees, representatives and consultants to handle your personal information with care and in accordance with best management practices. Our suppliers are obligated to do likewise.
- ❖ Our employees, representatives and suppliers may access and use personal information we collect only if we obtained consent for this purpose or if permitted by law.
- ❖ We regularly review the access rights of employees, representatives and suppliers, according to their roles and responsibilities.

We protect our facilities and IT systems

We've implemented robust security protocols to safeguard our IT platforms, facilities, and systems to ensure your personal information is protected around the clock. Below are examples of the security measures we employ:

Technological measures	<ul style="list-style-type: none">❖ Data encryption in-transit and at rest❖ Digital certificates❖ Firewalls and other network protection measures
Physical or administrative measures	<ul style="list-style-type: none">❖ Authorization required to access our resources and buildings where your personal information is stored❖ Constant monitoring of our facilities

Physical and Administrative measures

- ❖ Authorization required to access our resources and buildings where your personal information is stored
- ❖ Constant monitoring of our facilities

We communicate with you in a secure manner

We have measures in place to ensure the security of our communications with you, including when we collect your personal information. For example:

- ❖ We always verify your identity, whether online, by phone or in person. Other than to authenticate you, we avoid collecting certain personal information over the phone, such as your date of birth.
- ❖ We never ask you for your password or PIN code for any account.
- ❖ We will not contact you for the sole purpose of obtaining your personal information.

2.7. We retain your personal information for a limited time

We destroy personal information we collect once there is no longer a purpose for it. We retain your personal information only as long as necessary to:

- ❖ Fulfill the purposes for which we collected it, and
- ❖ Meet our legal obligations

2.8. We respect your privacy rights

Manage your consent preferences

You may review and change your consent preferences for the collection, use and disclosure of your personal information at any time. Please be aware, however, that we will no longer be able to offer you our products and services if you withdraw your consent for a purpose that is essential to our relationship with you (See the section we collect your personal information for specific purposes for further details).

For optional purposes, you may withdraw your consent at any time without adversely affecting our relationship with you.

You can contact us to withdraw your consent for the following purposes:

- ❖ Improve our products and services and provide a distinctive client experience
- ❖ Keep you informed of our promotions, products, services, contests and events that may be of interest to you

Withdrawing your consent may take up to 30 days to be processed and applied.

Accessing, rectifying or deleting your personal information

You have several rights regarding the personal information we hold about you. You may exercise them at any time.

Rights	
Know whether we hold personal information about you	You can ask us: <ul style="list-style-type: none">❖ If we hold personal information about you❖ How your personal information was collected, used and disclosed❖ If another person or organization holds your personal information for us
Access your personal information	You may ask to access the personal information we hold about you. You can also obtain a copy, but you may have to pay a reasonable fee for it. In some cases, we are unable to provide you with the requested information. For example: <ul style="list-style-type: none">❖ We share certain medical information with your health care professional. This person can then explain it to you correctly.❖ We cannot give you information that would reveal information about another person.
Rectify your personal information	You can request that we rectify your personal information if it is incomplete or inaccurate. You can also update it if it has changed.
Delete your personal information	You can request that we delete your personal information. Our response will depend on the situation.

	<p>If we have fulfilled the purposes for which the personal information was collected, we will delete it. However, we may retain it in order to meet our legal and regulatory obligations and protect our rights in the event of legal recourse.</p> <p>If we have not yet fulfilled the purposes for which the personal information was collected, we will delete the information that is out of date, inaccurate, incomplete or no longer required. If you request that we delete the rest of your personal information, we will no longer be able to offer you our products and services.</p> <p>You may submit a written request to exercise any of your rights in relation to your personal information. You will receive our written response within 30 days. If we deny your request in whole or in part, we will provide you with several pieces of information:</p> <ul style="list-style-type: none">❖ Reasons for the denial❖ The references of the laws and regulations that justify this denial❖ Your right to challenge this denial before the privacy regulatory authority of your province or territory❖ Timeframe for appealing the denial
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Requesting information about a decision based solely on the automated processing of your personal information

In certain circumstances, we may render a decision based solely on the automated processing of your personal information, without human intervention. For example, in the case of group insurance, this allows us to determine without delay, during your visit to the pharmacy, the portion of the cost of your medication paid by us and the portion you are responsible for paying.

You may, at any time, request an explanation of a decision based on the automated processing of your personal information and make corrections to the personal information that has been used. You may also share your comments with us.

Filing a complaint

You may file a complaint if you feel that we have mishandled your personal information.

We invite you to contact us first if you wish to file a complaint. We will take the time to analyze your complaint and work with you to resolve the situation.

You can also file a complaint with the privacy regulatory authority of your province or territory.

3. How to contact us regarding your privacy

You can contact us in writing at the addresses below to:

- ❖ Submit a request to access, rectify or delete your personal information
- ❖ File a complaint about the handling of your personal information
- ❖ Request assistance, send us a comment or ask any question related to your privacy

Make sure you provide us with all the information we need to follow up on your request.

By email: privacy@simplybenefits.ca

By mail: Office of Simply Benefits Chief Privacy Officer
200-45 Stanley Street
Ayr, Ontario N0B 1E0

4. If we update this notice

We regularly update our practices to bolster them and ensure that they reflect changing privacy laws, regulations and standards. We will notify you on our website (<https://www.simplybenefits.ca/>) of any material changes to this notice.