

## **PRIVACY STATEMENT FOR CUSTOMERS**

We are committed to maintaining the security, confidentiality and accuracy of all personal information under our control. As part of this commitment, we have established the following **TEN PRIVACY PRINCIPLES** that govern our information handling practices:

### **Principle 1 – Accountability**

*We are responsible for personal information under our control and we have designated one or more persons who are accountable for our compliance with the Privacy Principles.*

### **Principle 2 – Identifying Purposes for Collection of Personal Information**

*We identify the purposes for which personal information is collected at or before the time the information is collected.*

### **Principle 3 – Obtaining Consent for Collection, Use, or Disclosure of Personal Information**

*We obtain the customer's consent to the collection, use or disclosure of personal information unless consent is not required by law.*

### **Principle 4 – Limiting Collection of Personal Information**

*We limit the collection of personal information to that which is necessary for the purposes identified. We only collect personal information by fair and lawful means.*

### **Principle 5 – Limiting Use, Disclosure and Retention of Personal Information**

*We do not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual or as permitted by law. We retain personal information only as long as is necessary and in accordance with statutory requirements.*

### **Principle 6 – Accuracy of Personal Information**

*Personal information is maintained in as accurate and up to date a form as is necessary to fulfill the purposes for which it is to be used. If material errors in accuracy or completeness exist, the information may be amended, if appropriate, upon request.*

### **Principle 7 – Safeguarding Personal Information**

*We protect personal information with appropriate security safeguards in accordance with legislated requirements.*

### **Principle 8 – Openness Concerning Protocol and Practices**

*We make information available to our individual customers and employees concerning the policies and practices that apply to the management of their personal information.*

### **Principle 9 – Customer and Employee Access to Personal Information**

*Upon request, individual customers and employees will be informed of the existence, use and disclosure of their personal information, and be given access to it. Individual customers and employees may verify the accuracy and completeness of their information, and may request that the information be amended where appropriate.*

### **Principle 10 – Handling Customer Complaints and Suggestions**

*Individual customers or employees may direct any questions or inquiries about these Privacy Principles or our personal information practices to our Corporate Privacy Officer.*

## PERSONAL INFORMATION PRACTICES

**What personal information is collected:** The personal information we ask for depends on the nature of the service or product requested and is limited to the information needed to process that request or to provide better service. This refers to personal information contained in applications for insurance protection and information required to process claims made by policyholders, each of which can include personal medical and financial information. We seek to balance the company's need to use such information for reasonable business purposes and individuals' right to privacy in respect of their personal information.

**How personal information is collected:** The information we collect comes directly from the customer or indirectly from a third party. If a third party requires consent to disclose information, a signed Information Release form is obtained from the customer. If information is being collected by telephone, the call may be recorded and/or monitored. Telephone call recordings are used for quality assurance, training, and to establish a record of the information you provide. If you are not comfortable with having your telephone calls recorded, you have the option of communicating with us in writing and requesting that we respond to you in writing.

**How personal information is used:** We use personal information to communicate, to deliver products and services you have requested, and to provide information about additional products and services that we believe might be of benefit and interest to you.

**Disclosing personal information to outside parties:** Other than that which is necessary to deliver our services and products, we are required to keep all personal information confidential at all times, except under the following circumstances:

- When authorized by the party in question; or
- When required or otherwise authorized by law. This occurs when medical or security reasons may make it impossible or impractical to seek consent, such as during an investigation of a potential breach of contract, detection of fraud, and/or law enforcement purposes, where seeking consent may be inappropriate when the individual is a minor, seriously ill or otherwise incapacitated.
- If we need to share information with your employer, it will be strictly limited to information related to function and your ability to perform your job duties. No details of diagnosis, treatment, medication or medication will be disclosed to your employer.

**Safeguarding information:** We maintain security standards to ensure that all personal information is protected against unauthorized access, unauthorized disclosure, misuse, or inappropriate alteration.

**Accessing and amending information:** All individual customers have the right to access, verify and correct the personal information held by us. To submit a request for access to personal information, customers are asked to contact our Corporate Privacy Officer.

**Questions, concerns and complaints:** If there are any questions about our Privacy Protocol or concerns or complaints about privacy, confidentiality, or our information handling practices, our customers are advised to please contact our Corporate Privacy Officer. If you are not satisfied with the response you receive, you may contact the Information & Privacy Commissioner of Alberta.

**Contact information:**

Privacy Officer  
 First Canadian Insurance Corporation / Millennium Insurance Corporation  
 320 Sioux Road  
 Sherwood Park, AB T8A 3X6  
 Tel: 780-467-9575 Fax: 780-467-4016  
 Email: Pivacy@firstcanadian.ca

Information & Privacy Commissioner of Alberta:

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| <p>Office of the Information and Privacy Commissioner (Edmonton)<br/>         Suite 410, 9925 109 Street NW<br/>         Edmonton, AB T5K 2J8<br/>         Phone: (780) 422-6860<br/>         Fax: (780) 422-5682<br/>         Toll-Free: (888) 878-4044<br/>         Email: generalinfo@oipc.ab.ca</p> | <p>Office of the Information and Privacy Commissioner (Calgary)<br/>         Suite 2460, 801 6 Avenue SW<br/>         Calgary, AB, T2P 3W2<br/>         Phone: (403) 297-2728<br/>         Fax: (403) 297-2711<br/>         Toll-Free: (888) 878-4044<br/>         Email: generalinfo@oipc.ab.ca</p> |
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