

American
Health & Life Insurance Company
And
Triton Insurance Company

**Privacy of Personal Information
Statement**
(Current April 2017)

INTRODUCTION

Triton Insurance Company and American Health and Life Insurance Company (collectively referred to as the “**Insurers**” or, depending on the context, as “**we**”, “**our**”, or “**us**”, in this Privacy of Personal Information Statement) are affiliates of each other. The Insurers provide group creditor insurance products and services to individual customers of Fairstone Financial Inc. throughout Canada. “**Fairstone Financial**” means Fairstone Financial Canada, Inc., and “**you**” and “**your**” means an individual customer of the Insurers and/or Fairstone Financial.

OUR PRIVACY NOTICE: Our goal is to maintain your trust and confidence when handling personal information about you.

You Have Choices: As a customer of the Insurers, you have the opportunity to make choices about how personal information about you may be shared. As you consider this, we encourage you to make choices that enable us to provide you with quality products and services that help you meet your financial needs and objectives.

Security of Personal Information: The security of personal information about you is our priority. We protect this information by maintaining physical, electronic, and procedural safeguards that meet applicable law. We train our employees in the proper handling of personal information. When we use other companies to provide services for us, we require them to limit their use to their contracted services with us and that they protect the confidentiality and security of personal information they receive.

GENERAL: As you read this Privacy of Personal Information Statement (“**Privacy Statement**”), please remember that this Privacy Statement applies only to Triton Insurance Company and American Health and Life Insurance Company.

We have designated a Privacy Officer for the Insurers to ensure our compliance with applicable law, to receive and respond to customers’ questions and complaints, and to deal with requests for access to and rectification of personal information files.

CHANGES TO THIS PRIVACY STATEMENT: Any changes to this Privacy Statement and our information handling practices will be acknowledged in this Privacy Statement in a timely manner. We may add, modify or remove portions of this Privacy Statement when we feel that it is appropriate to do so. You may determine when this Privacy Statement was last updated by referring to the “Current” date displayed on the title page of this Privacy Statement. We will seek your consent as and when we change or expand the purposes for which we collect, use or disclose your personal information.

Categories of Personal Information We Collect and Hold: The nature of personal information we collect and hold about you may include:

- information we receive from you on applications for insurance, insurance claim forms and other forms such as name, gender, date of birth, address, telephone number, email address, occupation, employer and particulars of employment;
- information we receive from you on a volunteer basis when we are conducting a survey of your preferences, needs or interests;
- information we receive from Fairstone Financial with respect to credit that you have obtained from Fairstone Financial;

- information about your transactions with us and with Fairstone Financial, such as account numbers, account balances, the Fairstone Financial branch servicing the credit you have obtained from Fairstone Financial, payment history, and account activity;
- information we receive from your employer;
- information we receive from you or third parties (including hospitals, clinics and other medical facilities, physicians and other health care providers) about your health, including particulars of medical conditions, diagnosis and treatment; physician’s contact information and records of visits;
- information relevant to your credit, insurance, and any other products or services you request from time to time; and
- information from your employer, physician and Fairstone Financial as required to process your application or claim.

From time to time, we also collect additional personal information about you regarding the current status of your account and/or insurance from Fairstone Financial and generally for administering the insurance on your account. Where Fairstone Financial provides us with your social insurance number and indicates that you have consented, we may use your social insurance number for identification purposes, namely to ensure an accurate match of your application with our existing records. If required we may share your social insurance number with your present employer or with Service Canada for verification of employment information.

For purposes of evaluating, assessing, investigating and processing any insurance claims you submit, we may also collect additional information about you from the following sources:

- physicians and other medical and health care practitioners and providers;
- hospitals, clinics and other medical facilities;
- provincial and territorial Worker’s Compensation Boards;
- Employment and Social Development Canada;
- employers;
- Fairstone Financial;
- adjusters, investigators, inspectors, and police; and
- our affiliates.

Except as noted above in the case of medical information, we are not collecting any sensitive information from our affiliates or third parties, such as detailed information regarding specific purchases of goods or services, or information concerning customer preferences, needs or interests where a reasonable person would expect the subject matter to cause offence or embarrassment.

We have established policies and procedures pertaining to the retention and destruction of the personal information that we hold about you.

Purposes of Collecting Your Personal Information: We may use the personal information we collect about you for the following purposes:

1. to establish your identity;
2. in the case of a social insurance number, to establish your identity or verify your employment (only);

3. to determine your eligibility and processing your applications for insurance or other services we offer;
4. to evaluate, assess, and investigate your application, our insurance risks, and any claims you submit to us;
5. to administer and service the insurance products we provide to you;
6. to respond to your inquiries about applications, insurance products and other services;
7. to meet legal, security, processing and regulatory requirements, including Canadian federal and provincial requirements and foreign requirements applicable to us or any of our affiliates or service providers;
8. to understand your needs and to offer products and services to meet those needs;
9. to allow our affiliates and selected companies to promote their products and services to you; and
10. such other purposes as we disclose in this Privacy Statement or that we identify to you from time to time or as permitted by law.

You may refuse or withdraw your consent to 9. above, as explained in this Privacy Statement. We may also use or disclose personal information for other purposes with your consent, or as otherwise permitted or required by law (see *Consent* section, below).

Disclosures of Your Personal Information: In common with many organizations, we keep our costs down by obtaining some routine services from service providers, and your personal information may be provided to them. These service providers must sign a confidentiality agreement and may only use the information disclosed to them for the specific purposes mentioned in the agreement, after which they must return this information to the Insurers or destroy it, without keeping a copy. These disclosures to service providers may be for:

- statement preparation, printing and other administrative services;
- data processing and market research services;
- insurance underwriting and related functions or services;
- legal, regulatory and compliance purposes, including Canadian federal and provincial requirements and foreign requirements applicable to us or any of our affiliates or service providers;
- distributing information and/or promotional offers to you related to the products and services you have with us;
- managing your insurance benefits and claims administration services;
- debt collection activities in connection with amounts you owe to us;
- assistance to third parties or investigative bodies to help prevent fraud, money laundering or other criminal activity; and
- any other activities relating to the servicing or administration of the products and services you have with us, or as otherwise permitted or required by law.

Some of our service providers (including our affiliates acting in that capacity) that process or handle personal information on our behalf are located outside of Canada. As a result, your personal information may be transferred, stored and/or processed outside Canada in connection with the purposes described in this Privacy Statement. The contractual or other measures we use to protect your personal information are subject to the legal requirements of the foreign jurisdictions where your personal information may be transferred, stored or processed (for example, a legal requirement to disclose personal information to government authorities in those foreign jurisdictions).

Your personal information may be disclosed to the entities and persons identified in the *Purposes of Collecting Your Personal Information* above for the purposes of obtaining the information required, and may otherwise be disclosed to our affiliates and your advisor of record.

Affiliates With Whom We May Share Personal Information:

The Insurers and its affiliates share with each other “marketing lists” - lists of customers who meet certain general, non-sensitive criteria. This information may include your name, address, category of income, gender, preferred language of communication, preferences, needs or interests. The sharing of such information is done in order to assist our affiliates to offer products and services that may be of interest to you. We are not sharing specific financial information or medical or other sensitive information with our affiliates, except when our affiliates are acting for us as service providers, when we are authorized by law or if we have your consent. If you prefer that we not share our marketing lists containing your name and information about you with our affiliates, you may contact us at the appropriate address or telephone number mentioned in the *Contacting the Insurers About a Privacy Complaint or to Make a Request*, allowing for a reasonable time for the withdrawal of your name and that information.

Some of our affiliates described above may be located outside of Canada, and personal information disclosed to those affiliates will be subject to the laws of the foreign jurisdictions where those affiliates are located.

Third Parties With Whom We May Share Personal Information:

From time to time, we may disclose personal information, through marketing lists, to selected companies or organizations to allow them to offer you directly goods and services that may be of interest to you. These marketing lists contain very general and non-sensitive information such as names, addresses and telephone numbers, and categories of goods and services reflecting your preferences and interests. In no case will sensitive information about you, including specific financial data or credit ratings, be disclosed without your express positive consent. These selected companies and organizations will also be formally prohibited from disclosing the information to third parties or using it for another purpose without obtaining appropriate consent in advance.

If you prefer to be removed from the marketing lists we may share with third parties, you are free to opt-out at any time by contacting us at the appropriate address or telephone number mentioned in the *Contacting the Insurers About a Privacy Complaint or to Make a Request*, below. Please allow a reasonable time for your withdrawal request to become effective.

Business Transactions: From time to time, we may contemplate or participate in various business transactions that might involve access to your personal information by other participants in those

business transactions. Personal information may be used by us and disclosed to parties connected with certain business transactions and their professional advisors under an obligation of confidentiality, including the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of our business or assets, for the purposes of evaluating and/or performing those proposed business transactions. These purposes may include:

- permitting those parties to determine whether to proceed or continue with a proposed business transaction;
- fulfilling inspection, reporting or audit requirements or obligations to those parties; and
- permitting those parties to use and disclose your personal information for substantially the same purposes as described in this Privacy Statement.

Consent: Depending on the nature and sensitivity of your personal information, your consent to the collection, use or disclosure of such information can be express and positive (express and positive consent may be oral, in writing or electronic) or implied (such as by using or maintaining one of our products or services or by not responding to our offer to remove your personal information from our marketing list, in which case we assume that you consent). You may withdraw your consent at any time as long as you give reasonable notice of withdrawal. To withdraw your consent, please contact us at the address or telephone number mentioned in the *Contacting the Insurers About a Privacy Complaint or to Make a Request* section, below.

Withdrawal or refusal of consent is subject to legal and contractual restrictions. We can collect, use or disclose your personal information without your consent for legal, security, or certain processing reasons when authorized by law. For example, your consent is not required when disclosing your personal information to investigative bodies or government institutions to report any incidents of suspected fraud, money laundering or other criminal activity in relation to this information, and upon approval of your application, consent may not be withdrawn as it relates to processing, collecting or reporting your account information as necessary for the operation of your account. Where permitted or required by law, we may collect, use or disclose your personal information without your consent, for example to collect a debt. Please note that if you withdraw your consent, we may not be able to provide some products or services to you.

Please remember that your telephone conversations with our representatives may be monitored and/or recorded for quality control, internal training and recordkeeping purposes. As well, please remember that we and our affiliates and third parties with whom we share your personal information in accordance with this Privacy Statement may contact you by telephone, using the telephone number you have provided to us.

Accessing Your File: We will establish and maintain a file of personal information for each applicant and customer. In doing so, it is your responsibility to inform us of any changes whatsoever that could affect the status of your accounts or services with us. Your file will be kept by us and will be accessible at the Insurers. Only our employees, agents and mandataries who need to access your file in the course of their duties will have access to your file. You have the right to access your file and request rectification of any personal information in the file that may be obsolete, incomplete or incorrect. We want to make this as simple as possible for you. You can obtain the *Customer Access to Personal Information Request* form from us by contacting us at the address or telephone number mentioned in the *Contacting the Insurers About a*

Privacy Complaint or to Make a Request section, below. We will need to validate the identity of anyone making such a request to ensure that we do not provide your personal information to anyone who does not have the right to that information. We may charge you an administration fee for providing access to your file in accordance with your request. We will respond to access or rectification requests within 30 days of receipt of your request, unless we require a longer period as permitted by law.

Please note that, in certain circumstances, we may not be able to provide you with access to specific portions of file information about you. For example, we will not provide you with access to the following information:

- information containing references to other persons;
- information containing our confidential or proprietary information;
- information that has been destroyed; or
- information that is too costly to retrieve, such as information that is dated and archived.

Protecting Your Personal Information: Personal information in our possession may be kept in electronic or paper format in our offices or in third party provider facilities. Personal information may also be kept in secure offsite storage facilities.

We have policies, procedures, guidelines, and safeguards in place at the Insurers to ensure that your personal information is protected. Security measures such as passwords, restricted access to our offices and records, physical access security, and file encryption have been put in place to protect your personal information against unauthorized access, theft or misuse. Each employee of the Insurers is responsible for ensuring the confidentiality of all personal information accessed. As a condition of employment, every employee must sign a Code of Conduct, which includes comprehensive provisions ensuring the protection of your personal information.

Any personal information collected from you will be used for the purposes identified at the time of collection and will be retained for as long as is necessary to fulfill the service, or as required by law.

Contacting the Insurers About a Privacy Complaint or to Make a Request: To file a privacy complaint or an opt-out request, request access to your personal information, report incorrect personal information, or to obtain information about our policies and practices including our use of third parties and affiliates with whom we share your personal information, please contact us at:

Triton Insurance Company
American Health and Life Insurance Company
380-1420 Wellington Street
London, Ontario N6A 3N7
Attention: Privacy Officer
Telephone: 1-800-285-8623

We will investigate all complaints and will generally respond within 30 days of receipt of your complaint. If we find a complaint to be justified, we will take all appropriate measures, including, if necessary, amending our policies and practices.