



Specialists in
Health Insurance

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David Cummings Insurance Services Ltd.

Personal Information Protection Policy

(Updated April 27, 2023)

I. Introduction

David Cummings Insurance Services Ltd. recognizes and respects every individual's right to privacy. We are committed to providing our clients with exceptional service before, during, and after an insurance purchase is transacted. As providing this service involves the collection, use and disclosure of personal information about clients and potential clients, protecting personal information is one of our highest priorities.

As a private corporation operating in multiple Canadian provinces, our privacy obligations fall under Canada's federal privacy law, the *Personal Information Protection and Electronic Documents Act* (PIPEDA). Moreover, the priority we place on responsible handling of personal information aligns ethically with our vision statement.

OUR VISION

As a health and life insurance brokerage of choice,
engaged to help clients manage risk and have
better value solutions and services;

As an employer and team,
and

As a business partner:

We will flourish and be recognized in the marketplace
for **relentlessly championing duty of care, good faith,
and the dignity of each person**—in everything we do,
and across all relationships.

This personal information protection policy (hereafter referred to as the Privacy Policy) exists independent of but complimentary to the privacy policy and obligations of any associate advisors, and insurance companies involved in supplying the quotations and contract(s) under which you are - or are a potential - policy holder and/or plan member through our brokerage.

Please read this document in its entirety and retain a copy for your files. This Privacy Policy is subject to amendment. Our Privacy Officer will review and revise the Privacy Policy from time to time as required by changes in the prescribed applicable laws and regulations.

Your trust and confidence in our services is essential. For questions or concerns regarding the collection, accuracy, use, disclosure or storage of your personal information, please contact our Privacy Officer at the contacts provided below.

II. Definitions used in this document

You and your - mean the individual who is a client or potential client of David Cummings Insurance Services Ltd.

We, us and our - mean David Cummings Insurance Services Ltd.

Client – means an individual that does business with us either directly or through an authorized third party. This includes but is not limited to insurance policyholders, plan members, plan sponsors, and individuals for whom we provide an insurance quotation, proposal, or consulting service.

Personal information – means information about an identifiable individual. Depending on the type of product or service sought or applied for, examples of personal information we collect can include, but are not limited to: legal name, date of birth, biological sex, marital status, mailing and/or residential address, phone number, email address, country(ies) of citizenship, country of residence, travel itinerary, medical information, financial information, occupation and/or employment information, school affiliation and/or student registration number. Personal information does not include Public Contact Information (as defined below).

Public contact information – means information that would enable an individual to be contacted at a place of business and includes name, position name or title, business telephone number, business address, business email or business fax number. Public Contact information is not covered by this Privacy Policy.

Privacy officer – means the individual designated responsibility for ensuring that David Cummings Insurance Services Ltd. complies with this Privacy Policy and PIPEDA.

III. Overview

Scope

This Privacy Policy is applicable to all employees, consultants, and external contractors of David Cummings Insurance Services Ltd.

How we collect, use, and disclose your personal information:

We collect personal information to be able to analyze your insurance needs, provide informed proposals, and otherwise fulfill our duties as the licensed insurance agent between you and/or your policyholder or plan sponsor, and the insurance company insuring you, and to provide ongoing service to you as our client, including support for the successful use of your insurance. We assume your consent for us to use your personal information in an appropriate manner.

Some of the ways we may use and disclose personal information will be in order to:

1. Communicate with you in a timely and efficient manner
2. Obtain and provide premium quotations and/or consulting advice relating to the services and products you (or authorized third party) seek from us
3. Verify your identity
4. Determine your eligibility for products and services
5. Administer your enrolment for products and services
6. Participate in support services for claims and/or underwriting risks when required
7. Detect and prevent fraud
8. Conduct financial reconciliations or audit of insurance records
9. Act as required or authorized by law.
10. We may occasionally use your personal information to advise you of products or services we believe fit your personal circumstances and may be of interest to you. If you would rather not receive this type of communication, please advise our Privacy Officer.

Disclosure to third parties that require your personal information to fulfill their duties toward the purpose for which your personal information is collected:

Multiple parties are necessarily involved in the underwriting, enrolment, contract fulfillment, claims administration, and support services relating to insurance and assistance programs. The lawful, fair, and reasonable exchange of your personal information, with your express and implied consent in keeping with the purpose for its collection, is integral to exercising our professional role with duty of care and good faith.

We, your health services provider, your policyholder or plan sponsor, and your insurance administrators and insurers may exchange personal information when needed to administer your insurance or assistance benefits. As required your express consent will be obtained.

Your rights as they pertain to your personal information:

1. You have the right to know why an organization collects, uses or discloses your personal information.
2. You have the right to expect an organization to handle your information reasonably and to not use it for any other purpose other than the one to which you consented.
3. You have the right to know who in an organization is responsible for protecting your information.
4. You have the right to expect an organization to protect your information from unauthorized disclosure.
5. You have the right to inspect the information an organization holds about you and make sure it is accurate, complete and current.
6. You have the right to expect an organization to destroy your information when requested or when no longer required for the intended original purpose, subject to the legal and/or contractual obligations an organization may have to retain certain personal information.
7. You have the right to confidentially complain to an organization about how it handles your information and to the Privacy Commissions of Canada, if need be.

How to contact our Privacy Officer: Email

privacyofficer@david-cummings.com

Mail to: Privacy Officer
David Cummings Insurance Services Ltd.
Suite 350 – 2083 Alma Street
Vancouver, BC V6R 4N6 CANADA

Phone (604)-228-8816 Fax (604) 228-8816

IV. Our commitment to PIPEDA's ten "Fair Information Principles"

The ten principles of PIPEDA form the basis of this Personal Information Protection Policy.

Principle 1: Accountability. We are responsible for your personal information and we take steps to safeguard it from unauthorized disclosure. We have an appointed Privacy Officer. All our employees and external contractors are required to sign a confidentiality agreement binding them to maintain the confidentiality of all personal information to which they have access to.

Principle 2: Identifying Purposes. We need to obtain accurate personal information from you in order to establish your identity, determine your eligibility for particular products or services, and to help ensure that the advice and products or services offered to you are appropriate for you, to enroll you for coverage, and otherwise fulfill our duties as licensed insurance brokerage.

Principle 3: Consent. By providing your consent, you agree to allow us to communicate with you in a timely and efficient manner and to collect, use, and disclose your personal information to certain third parties, when required, to meet the legal, regulatory, and contractual requirements related to the services and products you seek. Your consent also allows us to retain your personal information in our paper and/or electronic files for as long as we are your insurance broker and/or enrolment administrator, and while we remain required to retain your personal information for contractual or regulatory reasons. Express consent will be obtained if, or when, a new use is identified. Consent may be expressed in writing or it may be given verbally, electronically, or through an authorized representative, such as your financial services advisor or plan sponsor. For certain types of disclosures your express written consent may be required.

Withdrawing your consent: Subject to legal, business, or contractual restrictions, you can withdraw your consent at any time upon giving us reasonable notice in writing. Please note that withdrawing your consent may limit or prevent us from communicating with you or providing you with specific products or services. In certain circumstances your consent cannot be withdrawn. For example, you may not withdraw your consent when we must have correct information about you to ensure a contract remains valid, or to comply with legal or contractual requirements.

Principle 4: Limiting collection. We will collect your personal information only for the purposes we have identified to you (and/or to your authorized representative or plan sponsor) and you have consented to, or for which the purpose is communicated by or self-evident according to the purpose for which we collect and/or you voluntarily provide it.

Principle 5: Limiting Use, Disclosure, and Retention of Information.

We limit access to your personal information to our authorized employees and external contractors who require it to perform their duties, to persons to whom you have granted access, and to persons authorized by law.

Third party use and disclosure: To provide you with certain services or products, we may need to disclose your information to some third parties. These may include but are not limited to, an insurance company (or companies), a Managing General Agency (MGA) contracted with an insurer (or insurers) to provide certain services. **These third parties are also required, by law, to protect your personal information.**

Licensed insurance agents have statutory and regulatory obligations which may require us to disclose client information on occasion to provincial regulators and self-regulatory agencies. Examples could include provincial insurance regulators, government entities responsible for detecting and preventing fraud, money laundering or other criminal activity, or when otherwise required by law. **Regulatory agencies are also required to protect your personal information.**

Your personal information will be retained for as long as it is necessary in relation to the purpose for which it was collected and to fulfill our legal, regulatory, or contractual obligations. We will destroy your personal information in a secure way when it is no longer needed.

Principle 6: Accuracy and Access. We take care to keep your personal information in our records as accurate, complete, and up to date, as necessary. However, we also rely on you to notify us when your information changes. Keeping your information updated allows us to offer you the best possible services and to make recommendations that are appropriate for you. You have the right to inspect your personal information to ensure it is accurate and request it be amended.

Principle 7: Safeguards. We take steps to protect your personal information against theft, loss, or unauthorized use. This protection applies to paper and electronic files. We use physical, organizational, and technological measures to safeguard personal information. We will promptly inform you if a breach occurs that puts your personal information at risk of being used in an unauthorized way. Personal information recorded on paper files that is no longer required is shredded prior to disposal to prevent inadvertent disclosure to unauthorized persons.

Principle 8: Openness. We will make readily available to our clients and potential clients specific information about our policies and procedures relating to the management of their personal information. If you require any further information about our policies or procedures, please contact our Privacy Officer.

Principle 9: Individual Access. Upon request, and upon verification of the individual's identity, a client shall be informed of the existence, use, and disclosure of his or her personal information, they shall be given access to that information and shall be able to challenge the accuracy and completeness of the information and have it amended, as appropriate.

Principle 10: Challenging Compliance. We take your privacy seriously. If you have a complaint, you have the right to challenge our compliance with this Privacy Policy and these "Fair Information Principles" and should do so in writing addressed to our Privacy Officer. Upon verification of your identity, the Privacy Officer will act promptly to investigate your complaint and provide a report of the findings to you within 30 days. We will work to help resolve any complaints you may have with us, or any of the third parties we work with, regarding the use of your personal information.

If you remain unsatisfied, you can file a complaint with Canada's Privacy Commissioner. More information on your privacy rights and complaint handling is available on Canada's Privacy Commissioner's website, www.priv.gc.ca.