



## **TOKIO MARINE CANADA LTD.**

### **PRIVACY POLICY**

Tokio Marine Canada Ltd. is committed to protecting the confidentiality and security of personal information we collect in accordance with applicable privacy laws. In this Privacy Policy we refer to Tokio Marine Canada Ltd. as “us,” “we,” or “our”. We refer to any person whose personal information we collect in connection with a product or service we provide, or an application for such product or service, as “you” or “your”. This Privacy Policy applies to the personal information (“**personal information**”) that we collect, use or disclose in the course of our insurance business.

Personal information means information about an identifiable individual.

This Privacy Policy does not apply to information about our employees or to information that is not personal information.

We may update this Privacy Policy from time to time. The most current version will be posted on our website at [www.tokiomarinecanada.com](http://www.tokiomarinecanada.com). You should periodically check our website for any changes to the Privacy Policy.

#### **HOW AND WHY WE COLLECT PERSONAL INFORMATION**

The type of personal information that we collect, and use depends upon the nature of your relationship with us, and may include the following types of information about you if that information is relevant to your relationship with us:

- name, address, e-mail address, and telephone number;
- date of birth, sex, family and marital status;
- education and lifestyle information;
- banking, credit, and financial information about you and about organizations in which you have an ownership interest;
- social insurance number and drivers' license number;
- previous insurance and claims experience;
- medical and health information; and
- employment and income information.

We collect and use personal information for insurance purposes, including to:

- review applications for insurance submitted to us for underwriting consideration;
- verify information provided to us;
- assess and underwrite risks;
- rate, bind, issue and administer insurance policies;
- investigate, adjust, process and pay insurance claims;
- communicate with you;
- analyze business results and compile statistics;
- meet legal and regulatory requirements;
- prevent and detect fraud or illegal activities; and
- as may be required or permitted by law.

We may also collect your personal information even if we do not have a commercial relationship with you in the context of claims made against our insureds.



We identify the purposes for which personal information is collected before or at the time of collection, and we only collect personal information that is necessary for the purposes identified. We will also restrict access to personal claims data (claimant or perpetrator) to a select group of senior individuals supporting the claims function. Any hard copy documents with details of personal claims data will be scanned electronically and destroyed or stored in a locked storage cabinet with access limited to the aforementioned senior individuals.

Most of the personal information we collect is provided to us by an insured or its insurance broker or agent. We obtain personal information from applications or as otherwise submitted to us by an applicant, an insured, or their insurance broker or authorized representatives. We may also obtain personal information from other sources such as consumer reporting agencies; other institutions or information services providers; employers; other insurers or insurance industry sources and databases; and insurance adjusters and private investigators in connection with claims.

### **PERSONAL INFORMATION WE SHARE**

We may exchange personal information with:

- our affiliates, reinsurers, other insurers and the insurance broker of the insured to whom the personal information relates;
- third parties to detect and prevent fraud or illegal activities;
- parties to whom you have provided consent to us sharing your personal information; and
- parties with whom we are legally permitted to share such information.

We may exchange personal information with third party service providers who perform services on our behalf. For example, we may use service providers to perform services including adjusting claims, printing, mail and email distribution, information technology, data storage, administration, marketing, and claims processing and investigation. Our contracts with our service providers require that our service providers keep all personal information confidential and secure and have privacy policies and security standards with respect to personal information that are comparable to ours. Our service providers are only given the information they need to perform their designated functions, and they are not authorized to use or disclose personal information for their own purposes.

### **CONSENT**

Personal information is collected, used and disclosed with the consent of the individual to whom the information relates, or as otherwise permitted by law.

You may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice. You will be advised of the implications of such withdrawal, which may include the termination of a policy or the inability to process or defend you in a claim.

### **SECURITY**

Personal information recorded in paper documents is securely stored in our offices in Canada or in secure off-site storage facilities. Electronically recorded information is stored on computer systems maintained by us, our affiliates and our service providers. Your personal information may be processed and stored in countries other than Canada, and may be accessible to the governments, courts or law enforcement or regulatory agencies of such countries.

We have adopted physical, organizational and technological security safeguards to protect personal information against unauthorized access, loss or theft that are appropriate to the sensitivity of the information. Our computer systems and the information stored in them are protected by electronic security systems. We restrict access to personal information to our employees, reinsurers, administrators and consultants who need to know the information to provide insurance products and related services. Our



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employees receive training on how to protect personal information and they are required to comply with this Privacy Policy and all applicable privacy laws.

We retain personal information only for as long as necessary to fulfill the purposes for which it was collected and to comply with our regulatory obligations and obligations under Applicable Law. When personal information is no longer necessary, we destroy, erase or anonymize such information. In view of the ongoing exposure to potential claims, where necessary, some of the personal information collected for insurance purposes may be kept indefinitely.

### **ACCURACY**

We try to ensure and maintain the accuracy of the personal information we collect and use. However, we rely on individuals who provide personal information to us to disclose material information to us and advise us of any changes. You may request the rectification of your personal information. Where individuals provide evidence that personal information we hold is incorrect, we will correct such information.

### **INDIVIDUAL ACCESS**

You may request to be informed of the existence, use and disclosure of personal information pertaining to you. Subject to satisfactory proof of identity, appropriate access will be provided to such information. In certain situations, we may not be legally permitted to provide access to all personal information held with respect to you. For example, we cannot provide access to personal information relating to other people or personal information protected by legal privilege. Exceptions to the access requirement will be limited and specific, and we will provide you with the reason for denying access.

### **ERASURE**

You have the right to request the erasure of your personal information, under certain circumstances. Your information can only be erased if your personal information is no longer necessary for the purpose for which it was collected, and we have no other legal ground for using your personal information.

### **OPTIONAL MARKETING PURPOSES**

We may use the personal information you provide to offer you, or organizations in which you have an ownership interest, additional products and services that we provide. The collection, use and disclosure of personal information for such marketing purposes is entirely optional and is not required as a condition of doing business with us. You may withdraw your consent to the use of personal information for optional marketing purposes at any time by contacting us at [TMC\\_info@tokiomarinecanada.com](mailto:TMC_info@tokiomarinecanada.com). We do not sell, trade or disclose our customer lists for marketing purposes.

### **CONTACT US**

If you have any questions about this Privacy Policy or our privacy practices, or if you wish to request access, verification, rectification or erasure of your personal information or to remove your consent to the collection of your personal information or to make a complaint, please contact our Privacy Officer at: [dsinger@tokiomarinecanada.com](mailto:dsinger@tokiomarinecanada.com)

### **WEBSITE AND PRIVACY**

#### **COOKIES**

When an individual visitor accesses our website, we may use a browser feature called a “cookie” to collect information on the visitor’s browsing actions and patterns. A cookie is a small text file containing a unique identification number that identifies the visitor’s browser. The cookies we use include:



**Analytical cookies:** They allow us to recognize and count the number of visitors and to see how visitors move around the website. This helps us to improve the way our website works.

**Strictly necessary cookies:** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.

**Functionality cookies:** These are used to recognize you when you return to our website. This allows us to personalize our content for you and remember your preferences (for example, your choice of language).

**Targeting cookies:** These cookies record your visit to our website, the pages you have visited and the links you have followed. We will use this information to make our website more relevant to your interests. Unless a visitor specifically informs us (for example, by sending us correspondence from the website), we will not know who the individual visitors are.

We do not sell the information collected by cookies, nor do we disclose the information to unrelated third parties, except where required by law (for example to government bodies and law enforcement agencies).

Our website also uses web beacons – sometimes called single-pixel gifs – that work in conjunction with cookies and allow us to count users who have visited certain pages and to compile statistical information about how our website is used.

In addition to the identified purposes described in this Privacy Policy, we may use this website information and share it with other organizations with whom we have a commercial relationship to measure the use of our website, to improve the functionality and content of the website and to facilitate usage by a visitor. Visitors can reset their browsers either to notify them when they have received a cookie or refuse to accept cookies. However, if a visitor refuses to accept cookies, he or she may not be able to use some of the features available on our website.

## **GOOGLE ANALYTICS**

We use Google Analytics to collect information about how you use the website in order to improve the website experience. Google Analytics does not collect or store information that will identify you. Your IP address is anonymized prior to being stored on Google's servers in order to help safeguard your privacy. For more information on Google Analytics go here – <https://www.google.com/policies/privacy/partners/>. You may block the use of Google Analytics by installing the opt-out tool found here – <https://tools.google.com/dlpage/gaoptout>.

## **USE OF YOUR PERSONAL INFORMATION OBTAINED ON THE WEBSITE**

In order to provide our website visitors with a service or information, visitors may voluntarily submit personal information to us for purposes such as asking a question. We may combine and store personal information about your use of our website and the online information you have provided with certain other online and offline information we may have collected about you.

## **SECURITY**

We have adopted security measures to protect the personal information provided through this website. We use multiple layers of security controls to ensure that all recorded information in our files and computer systems is protected from unauthorized access and dissemination. Our systems are secured with combinations that may include layers of encryption, firewalls, and filtering routers monitoring outside access to our systems. Internal/remote user access is strictly controlled and monitored, and we use multiple level password verification to ensure user authorization to our information systems. Any third-party service



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providers we use who have access to personal information provided through the website are required to adopt a comparable level of security measures.

Although we take every effort to ensure that no one else will see or obtain your personal information, complete confidentiality and security is not possible over the Internet.

### **LINKS**

Our website may contain links to other websites which are provided as a convenience only. While we try to link only to sites and services that share our high standards and respect for privacy, we are not responsible for the content of, or the privacy practices employed by, other companies or websites. Once you link to another site, you are subject to the privacy and security policies of the new site, and you should review its privacy policy, especially if you share any personal information.

### **RIGHTS SPECIFIC TO RESIDENTS OF THE EUROPEAN UNION**

We are subject to Canada's *Personal Information Protection and Electronic Documents Act* ("**PIPEDA**") and applicable provincial privacy laws. In the course of our activities insuring risks in Canada, we may collect personal information about our insureds' EU resident directors, officers and employees and about other EU residents. Subject to PIPEDA, the laws of Canada and applicable provincial privacy laws, if you are an EU resident you may have the following additional rights, as provided by the General Data Protection Regulation ("**GDPR**").

### **RESTRICTED PROCESSING**

You may ask us to suspend the processing of your personal information in the following scenarios: (a) if you want us to establish the information's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the personal information even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your personal information but we need to verify whether we have overriding legitimate grounds to use it.

### **PORTABILITY**

You may request the transfer of your personal information to you or to a third party. We will provide to you, or a third party you have chosen, your personal information in a structured, commonly used, machine-readable format. This right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Your rights in relation to automated decision-making and profiling:

You have the right not to be subject to a decision based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.