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## RedOak Insurance Advisors Ltd. Privacy Policy

This Privacy Policy sets out principles and practices of RedOak Insurance Advisors Ltd. ("us", "our", "we"), with respect to the handling of the personal information of our customers ("you", "your"). As part of our ongoing commitment to protecting your personal information, we have adopted the RedOak Insurance Advisors Ltd. Privacy Policy, which is based on the privacy principles set out in the Personal Information Protection and Electronic Documents Act (PIPEDA) as well as applicable provincial privacy laws. Some providers of our services are companies with whom we have business relationships, Business Partners, specifically, property and casualty insurance companies with whom we place insurance policies with on behalf of our clients. To provide you with certain services, your personal information may be collected, used and disclosed to these companies.

### **Our commitment to you**

Respecting your privacy and protecting your personal information is an important part of how we do business. Regardless of how the range of services we offer our customers expands and the technology we use changes, we remain committed to protecting the privacy of your personal information. This Privacy Policy is part of our commitment to ensure that all personal information in our possession is protected and used in accordance with the law. This Privacy Policy does not replace the applicable privacy policies of our Business Partners. To the extent that a Business Partners' privacy policy may permit disclosing your personal information to us, and when such disclosure occurs, your personal information will then be collected, used and disclosed by us according to this Privacy Policy. This Privacy Policy is subject to changes from time to time, so we encourage you to review this Privacy Policy regularly.

### **Your Personal Information**

"Personal Information" is defined as information about an identifiable individual. In the course of providing, you with insurance products and services, we may collect the following types of personal information about you and others, depending on the type of service you choose:

- Basic information (name, address, telephone number(s), email address, date of birth, marital status, employment information)

- Property details and other information regarding your assets and annual income including mortgage and loan details, vehicle identification number, insurance policy numbers
- Insurance experience including claims history
- Credit and past payments records
- Drivers license and driving record
- Medical information (such as a condition that affects the operation of a vehicle)
- Information regarding your family including spouse, children and dependents,
- Any other information you provide us or that we collect with your consent, or as required by law.

We recognize that some Personal Information is highly sensitive, and we consider the sensitivity of the information in deciding how we will use it, and, if appropriate, disclose it, and in how we will obtain your consent to such use and disclosure.

### **How we collect your Personal Information**

We primarily collect personal information directly from you through telephone conversations, emails, online forms, applications and in-person meetings. Occasionally, with your consent, we will also collect this personal information from our Business Partners, or other third parties such as home builders, other brokers or agents, government agencies, financial institutions and/or medical professionals in order for us to provide you with our services.

### **Safeguarding Personal Information**

Confidentiality is a priority for us, and we take all the reasonable measures to safeguard the privacy of your Personal Information, whether you purchase your insurance through our service or not, from loss or theft, and against unauthorized access, disclosure, copying, use or modification.

We will safeguard the security of personal information under our control in a reasonable manner including implementing physical, technological and organizational security measures. We will continue to evaluate our security measures and as necessary implement additional measures.

### **Collection, use and disclosure of your personal Information**

We may collect Personal Information about you, including information obtained as a result of

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your relationship with us and others. We may collect, use and disclose your Personal Information for several purposes, including, but not limited to:

- To communicate effectively with you;
- To develop and maintain our relationship with you, including inviting you to comment on the services we provide to you;
- To process your application or quote for services, and share your information with the providers of those services;
- To provide and administer the services you have requested;
- To approve transactions;
- To receive payments;
- To verify your identity and to protect all parties from errors and fraud;
- To verify your eligibility for certain services;
- For research and statistical analysis purposes (we anonymize information used for such purposes to the extent possible);
- To provide you with information about other services offered by us, our Business Partners and select unaffiliated entities, which we believe may be of interest to you;
- To respond to inquiries about your application, account, insurance policy or any other business that you have with us;
- To comply with legal and regulatory requirements;
- To protect RedOak Insurance Advisors Ltd; and
- For any other purpose as set out in this Privacy Policy.

In addition to the purposes outlined above, we also collect, use and disclose to the Business Partners Personal Information required to complete any applications for insurance that you make. Where permitted by law, we may use and/or disclose the information we have collected from your request for a quote or on your online application, for any purpose described in this Privacy Policy, even if you do not purchase the insurance or your application for insurance is declined.

Your health information may be required to establish your eligibility or rate for certain insurance services or to process a claim. However, this information is not used or disclosed for any other purpose.

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We will only retain your personal information as long as necessary to provide you with our services or required by law.

### **To whom we disclose your personal information**

We may disclose your Personal Information within the RedOak Insurance Advisors Ltd. company, to our Business Partners, to third party service providers, and to other select unaffiliated entities for the purpose of meeting your insurance needs.

When we disclose Personal Information, we only provide as much Personal Information as is required to fulfill the purpose for which the Personal Information is being disclosed. In order to provide you with the services you have requested, your Personal Information may be processed and stored by us, by Business Partners, by third party service providers or by select unaffiliated entities located outside the province in which the information was collected.

### **Your consent**

We will not collect, use or disclose your Personal Information without your knowledge and consent except in certain limited circumstances as required or permitted by law. By applying (even if your application is declined) or requesting an offline and/or online quote (even if your quote is not fully processed) for any product or service covered under this Privacy Policy, or by accepting, using, or continuing to hold any such product or service, you consent and agree to the collection, use and disclosure of your Personal Information in accordance with the terms of this Privacy Policy. Consent can be express or implied, depending on the circumstances. Your consent is implied when we provide you with reasonable notice of the purposes for which we intend to collect, use or disclose your Personal Information, for example by making this Privacy Policy available to you, and providing you with a reasonable opportunity to refuse or withdraw consent to the proposed collection, use or disclosure, and you do not, within a reasonable time, respond to our notice and this opportunity to refuse or withdraw consent. We will obtain your consent if we wish to use Personal Information that we or our Business Partners have already collected in a manner that is not identified in this Privacy Policy, beyond what you would reasonably expect. For more information on refusing or withdrawing your consent, please see the section 'Our opt-out policy', below.

### **Our opt-out policy**

You have the option to refuse or withdraw your consent to the collection, use or disclosure of your Personal Information as follows:

- You may choose not to provide certain Personal Information to us. Please understand that this may limit our ability to serve you and may prevent us from providing certain services to you.
- You may, with reasonable written notice, withdraw your consent to the collection, use or disclosure of your Personal Information, subject to any legal or contractual restrictions.
- You may request, by reasonable written notice, that you do not want to receive personalized direct marketing communications from us. However, due to printing and distribution schedules, you may continue to receive some communications that were in progress before we were able to process your request.
- If you advise us in writing that you do not wish to receive any marketing communications from us, we will do our best to accommodate your request, within current industry standards and our technical capabilities. This will not limit information that we may send to you with your account statement, or discussions with any of our associates.
- If you have previously sent a written request to us not to receive marketing communications from us, we will continue to honour that request.
- You may, with reasonable notice, request to opt-out from any disclosure to merchants of any changes to your account, including the account number, any card number or card expiry dates, and the status of your account.

If accommodating your request would limit or prevent us from providing you with a product or service you have requested, where possible, we will explain the implications of your request to you in order to help you make an informed decision.

You may contact us regarding your consent to the collection, use and disclosure of your Personal Information at the addresses shown in the 'How to contact us' section below.

### **Accessing your personal information**

Requests for disclosure of your Personal Information must be made in writing, by email, or letter. Upon such request, we will provide you with reasonable access to your Personal Information that is in our possession. It is important to verify that the individual requesting

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information is in fact the person in question. For this reason, we demand that all inquiries be in writing and that our responses, also in writing are sent to the address we have on file. We will also update and/or correct your Personal Information as required. It is your responsibility to provide updates on changes to your Personal Information.

If we are unable to provide you with access to your Personal Information, we will provide reasons for our inability to do so, unless we are prohibited from doing so by law.

In addition to this Privacy Policy, please refer to the privacy policy of your insurance company, information about which is included with your insurance policy.

**Use of Cookies and Tracking Technologies:**

We may use cookies, or similar tracking technologies, to analyze website traffic and optimize your website experience. By accepting our use of cookies, your data will be aggregated with all other user data. Additionally, through our website provider, third parties and service providers may have access to the cookies for the purposes of analytics and/or tailored advertising. Our website includes the option to decline cookies at your request.

**How to contact us:**

If you have any questions or concerns regarding this Privacy Policy, please contact us at:

Email: [privacy@redoakinsurance.ca](mailto:privacy@redoakinsurance.ca)

Telephone: 416-572-5247

**Mailing Address:**

RedOak Insurance Advisors Ltd.

Attention: Privacy Officer

100 University Avenue, 5th Floor

Toronto, ON

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*Please note that for both training and quality of service purposes it is possible that telephone conversations may be recorded or monitored.*