



Germania Mutual Insurance Co. Privacy Commitment to you...

At **Germania Mutual Insurance Co.**, we are committed to protecting our client's personal information, which includes insureds, former insureds, applicants, claimants, and other individuals involved in a claim. Maintaining your trust and confidence is fundamental to our business scope. We ensure a high level of compliance with our staff with the strictest standard of security and confidentiality of your personal information.

On January 1, 2004, the **Personal Information Protection and Electronic Documents Act (PIPEDA)** came into force to ensure all commercial Organizations in Canada to do the same. **PIPEDA** applies to the operations of all Insurance Companies, it sets out the rights of the consumer and duties of the company to protect personal information, puts into law the general information industry practices that we follow. Germania pledges to safeguard the privacy rights defined in **PIPEDA** and all relevant laws.

Accountability

- We have appointed our Secretary Manager accountable for ensuring your personal information is used and protected properly

Identifying Purposes

- Identifying the purpose for collecting your personal information will be explained at or before the information is collected

Consent

- Unless required by law, we will not collect, use, or disclose your personal information without your knowledge and consent.

Limiting Collection

- **Germania Mutual Insurance Co.** will not use or disclose your personal information for the purpose other than those for which it was collected, except with consent or as required by law. We will only retain your information as long as necessary for the purpose to which you have consented.

Accuracy of Information

- Your personal information will be as accurate, complete and up-to-date as is necessary for the purpose of which it is to be used.

Safeguards

- **Germania Mutual Insurance Co.** has security safeguards in place to ensure your personal information is kept safe from loss and unauthorized access, modification or disclosure.

Openness

- We will make readily specific information about our policies and practices relating to the management of personal information.

Individual Access

- Upon request, we will inform you of existence, use and disclosure of your personal information. If your information is incomplete or inaccurate, we will promptly amend it accordingly.

Challenging Compliance

- An individual can address a challenge if they feel we are not properly complying with these privacy principles to our Privacy Officer

Collection

As part of doing business with you we are often required to collect personal information unless it is provided to us voluntarily and knowingly through written, verbal or electronic contact with you. Third parties may be sourced to obtain information.

We collect, use and disclose your personal information as a way to provide you with the insurance protection you've requested or in the case of a claimant to provide you with the entitled compensation. To fulfill this, we use your personal information for the purpose of: establishing and maintaining communication; underwriting risks on a prudent basis; investigation and paying claims; detecting and preventing fraud; offering and providing products and services to meet your needs; complying statistics and complying with the applicable provincial legislation.

We only collect personal information that we require to provide you with the insurance protection that you have requested and to administer any claims that you may have. The type of personal information that we hold depends upon the type of your dealings with us, but may include: name, address, telephone number, date of birth, family status, marital status, occupation, assets, liabilities, income, credit rating, whether or not credit was extended or refused, and insurance experience including claims history.

Given the nature of the general insurance industry, consent may be implied in some circumstances, for example; we sometimes provide insurance or amendments to existing policies over the telephone, on short notice or with little written documentation.

Use

We will request data necessary and appropriate under the circumstances. Your personal information will not be provided to any third parties unless authorized by you. Information collected will be maintained to assist us in understanding and appropriately responding to your current and future needs. You may advise us of any changes to your personal information at any time.

Protecting and Disclosing

Your personal information is kept in strict confidence and will not be shared with anyone outside Germania Mutual Insurance unless required by law and with your express or implied consent. Your personal information will be protected with the appropriate security measures, and those third parties who receive the information are required to do the same.

There are situations specific to the general insurance industry where we will disclose personal information as dictated by prudent insurance practices. For example: part of the underwriting handling process, we may transfer personal information to other insurance companies including reinsurance companies, which share the risk. We may also disclose personal information to businesses that provide goods and services to insurance companies and their customers, such as claims, adjustors, appraisers and repair shops. As well, we may disclose personal information to insurance intermediaries, such as your broker. Only the information necessary for these services will be provided to these service providers, and it is done on the basis that they will maintain the confidentiality of the information. We do not make any personal information available to affiliated organizations without your consent.

If you do not agree with the proposed use or disclosure of your personal information, you may withdraw your consent at any time, subject to legal or contractual restriction, and reasonable notice. Your withdrawal may prevent us from offering you our products and services.

Confidentiality Agreement

Germania Mutual Insurance Co. employees who have access to your information comply with the privacy purposes as well as the company's Code of Ethics, which requires employees to uphold strict standards of confidentiality regarding affairs and accounts of policy holders.

We protect your personal information from loss or theft and from unauthorized access, disclosure, copying use or modification. The type of safeguard depends on the sensitivity of the information and all paper information is shredded when destroyed.

Contact Information

If you would like more information or if you have any questions or concerns about our privacy policy or your personal information, please contact:

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