

Protecting your privacy is important to us

This Privacy Policy explains how and why ivari collects, uses, stores, and discloses your personal information.

While collecting and using personal information is necessary to our business as an insurance provider, protecting your personal information and respecting your privacy is just as important and we take this responsibility very seriously.

As part of our commitment to protecting your personal information, we make every effort to ensure that our Privacy Policy continues to reflect all current Canadian laws and guidelines.



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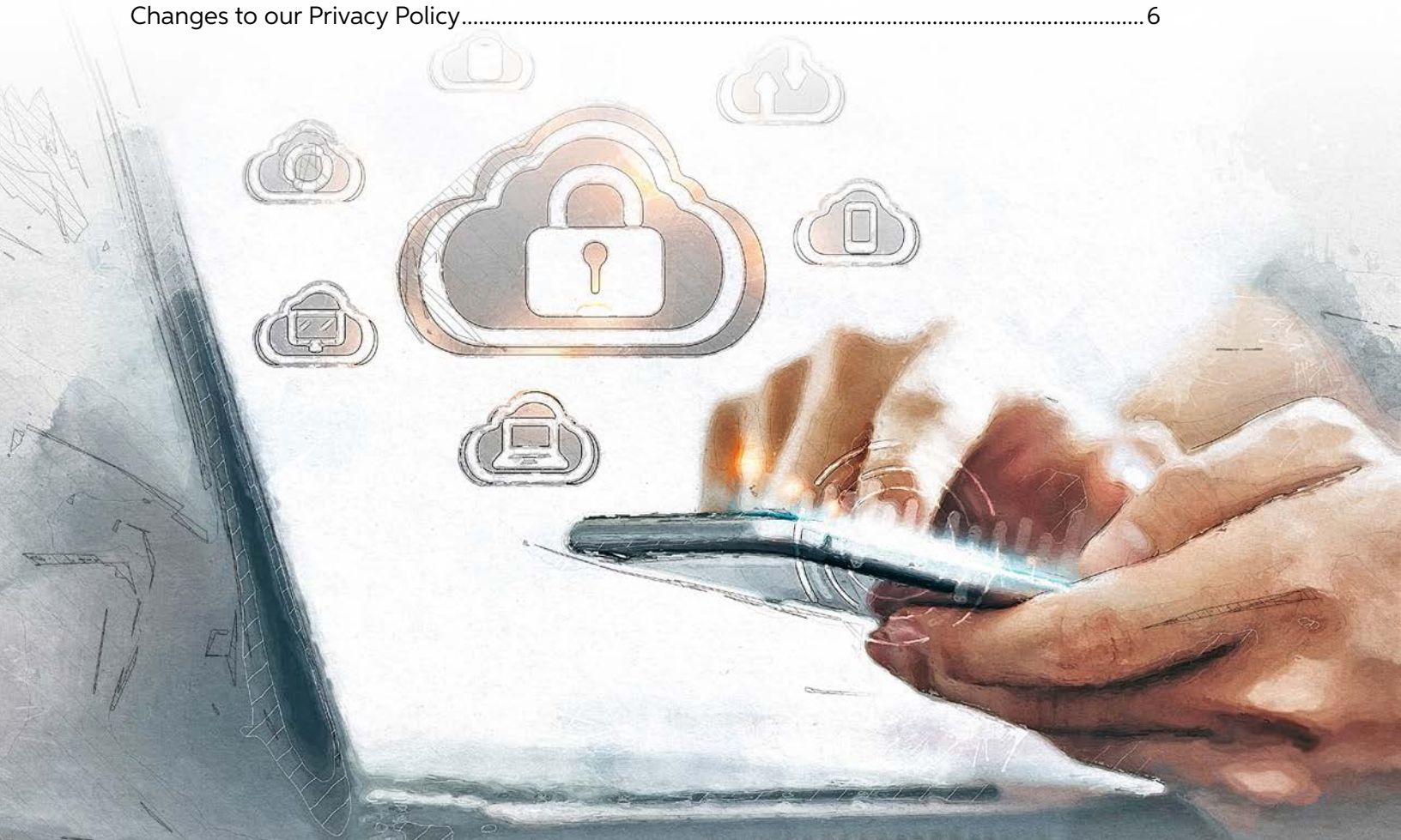
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Accountability

ivari is responsible for personal information under its control. Our Privacy Office is responsible for ensuring that ivari follows and enforces the privacy laws and obligations outlined in this Privacy Policy.

The personal information we collect and use

The term “personal information” means any factual or subjective information that can identify an individual. The personal information ivari may collect and use includes:

- banking, financial, credit, and asset information
- health and medical information
- lifestyle information (e.g. smoking, alcohol consumption)
- date of birth, gender, and marital status
- social Insurance Number (SIN)
- resident information and citizenship status
- employment, occupation, and income
- character, general reputation, and personal characteristics
- name and contact information

Your consent to collect, use, store, and disclose your information

We require your consent to collect, use, store, and disclose your personal information, except where required by law. Depending on the situation and sensitivity of the information, we may obtain your consent in different ways and there are two forms of consent: express and implied.

Express consent

This form of consent may be obtained verbally, online, or in writing, (for example, when you complete an application form).

Implied consent

This form of consent may be obtained when you approach us for information, inquire about or apply for products or services from us. It may also be obtained when you do not explicitly withdraw your consent when given the opportunity to do so. As well, implied consent can be obtained when, with your direction, a representative you authorize gives consent on your behalf.

Why we collect, use, store, and disclose personal information

We collect, use, store, and disclose your personal information for a number of reasons, including to:

- verify your identity
- determine your need for insurance and eligibility for the product(s) you request
- administer and service the insurance products ivari provides to you
- investigate, review and process your claims and complaints
- meet regulatory obligations such as provincial and federal tax reporting, anti-money laundering, and unclaimed property
- meet contractual requirements relating to the services and products ivari provides to you

Where we collect your personal information from

ivari collects personal information from:

- applications, including any supplementary forms and questionnaires
- interactions with you (email, phone, fax, online)
- public sources, such as government agencies and websites
- any third parties that ivari works with to manage your policy(s)

As well, your calls might be recorded to have a record of the information you provide and to improve our customer service. If you don't want your calls recorded, please contact us in writing only.

Third-party collection and disclosure of personal information

We may collect, transfer, and disclose your personal information for the purposes of evaluating your insurance policy, servicing, investigation, and claims analysis to:

- third-party administrators and service providers, such as the Medical Information Bureau (MIB), reinsurers, physicians, medical and health care practitioners and providers, hospitals, clinics, and other medical facilities to name a few.
- third-party administrators that service your policy
- your independent insurance advisors, including the independent insurance advisor's distributor

As well, we may disclose your personal information (name, contact information, and your current insurance coverage, but not your personal health or financial information) to marketing providers to offer you new or additional insurance products and services.

ivari's third-party administrators and service providers are required to protect your personal information consistent with this Privacy Policy, ivari's privacy and security practices, and in accordance with applicable laws.

Personal information may be released to an investigative body, legal, or regulatory authorities in cases of suspected criminal activity, financial abuse, contravention of law, or for the detection and prevention of fraud. ivari will release the personal information requested, to comply with a court order, search warrant, or other demand or inquiry from a legal or regulatory authority or, to protect our assets and interests or manage or settle any actual or potential loss.

Please note that in no instance will we sell your personal information.

How we protect your personal information

We are responsible for all personal information under our control. We have safeguards in place to prevent unauthorized access, disclosure, or use of your personal information. To ensure the security of your personal information, we:

- use technology, such as firewalls, anti-virus software, passwords
- develop and comply with internal privacy policies and procedures
- regularly review and update our policies
- regularly update internal access levels to match the sensitivity of the information
- administer regular employee privacy training

When you apply for ivari products or services, we create and maintain a client file(s) that includes your personal information at our head office in Toronto, our regional offices, and/or our third-party administrator's offices. Our employees, the advisors who sell our products, our business partners, and authorized service providers are required by law and contract to protect the confidentiality of your personal information and may not use your information for any unauthorized purpose.

Note that only those employees, advisors, business partners, and authorized service providers who need your personal information to carry out their work responsibilities are given access to your personal information, and only to the extent necessary for those purposes.

Your right to request access to your personal information

You have the right to know:

- if we hold your personal information
- how we have used, and are using, your personal information
- to whom we have disclosed your personal information

To access your personal information, please provide your request in writing. In some situations, we may not be able to provide you with all your personal information. For example, we may not be able to disclose the information if it would reveal personal information about another party or would reveal confidential commercial information. Please contact the Privacy Office at the address below to access your personal information.

Accuracy of personal information

We will make reasonable efforts to keep your information accurate and up to date. You are required to inform ivari of any updates to your personal information. ivari maintains policies and procedures to help ensure that the personal information collected and recorded are accurate and current. You have the right to request the correction of any inaccurate or incomplete information about you.

Information may be located outside of Quebec and/or Canada

We, and third-party providers to whom we disclose information, may conduct activities in other jurisdictions outside of Quebec and/or Canada. Third-party administrators and service providers have contractual obligations to protect your personal information consistent with this Privacy Policy. As a result, your personal information may be used, stored, or accessed in other countries or jurisdictions and may be subject to the laws of those countries or jurisdictions. For example, personal information may be disclosed in response to demands or requests from governments, regulators, courts, or law enforcement agencies in those countries or jurisdictions.

How long does ivari retain your personal information

ivari will only keep your personal information for as long as it is needed for the purposes stated, or as required by law or guidelines published for the life insurance industry in Canada. The length of time ivari keeps personal information depends upon the product or service that we provide to you and the nature of the information. This period may extend beyond the end of your relationship with ivari only for as long as reasonably necessary to fulfill its intended purpose, or to satisfy legal or regulatory requirements. When such personal information is no longer required ivari has procedures to destroy, delete, erase or convert it to an anonymous form.

Opting out of marketing communications

From time-to-time, ivari may wish to send you information about our products. If you do not want to receive this information you may opt out at any time by either selecting the “opt out” option when your personal information is being requested, or if an opt out option is not offered, you can let your advisor know that you wish to opt out. You can also contact us directly at, telephone: 1-800-846-5970 or email: conversation@ivari.ca

Withdrawing your consent

You may withdraw your consent for us to collect, use, store, and disclose your personal information at any time, subject to legal and contractual restrictions, and reasonable notice. However, if you do so, we may not be able to continue to provide you with our insurance products and services. Please contact ivari’s Privacy Office listed below for more information and/or to withdraw your consent.

If you have a privacy-related questions, concerns, complaints, or comments, please contact the Privacy Office at:

Manoj Ahuja Chief Compliance Officer

Privacy Office

200-5000 Yonge Street Toronto, ON M2N 7E9

Email: privacyoffice@ivari.ca

Telephone:

1-866-447-7390 (English)

1-866-880-6075 (French)

Changes to our Privacy Policy

We may review and amend this Privacy Policy without notice. Please review the Privacy Policy periodically to ensure that you are aware of our current information management practices.

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