

Protecting your privacy is important to us

In this Privacy Policy:

- “**we**”, “**us**” and “**our**” refers to ivari® and ivari’s authorized third party administrators
- “**you**” includes any individual who is any or all of the following:
 - An owner of an ivari insurance policy or investment contract (a “policy”), or an authorized representative of such an owner
 - Insured under an ivari policy
 - Paying premiums or making a claim under an ivari policy
 - Communicating with us and/or are using the ivari.ca website and/or ivari’s online platforms (together, the “**Websites**”)
- Sharing personal information with us so we can administer or service an ivari policy in accordance with applicable laws



This Privacy Policy explains:

- What personal information we may collect and retain from you.
- How and why ivari collects, uses, and discloses your personal information.
- ivari's practices for maintaining and protecting your personal information.
- Your rights and choices in respect of ivari's handling of your personal information.
- How to contact ivari's Privacy Office.

While collecting and using personal information is necessary to ivari's business as an insurance provider, protecting your personal information and respecting your privacy is also important and we take this responsibility very seriously. As part of our commitment to protecting your personal information, we will update our Privacy Policy periodically to reflect applicable Canadian and provincial laws and guidelines.

Please review this Privacy Policy carefully and on a periodic basis to understand ivari's current policies and practices for handling your personal information. We may review and amend this Privacy Policy from time to time to comply with changes in law, guidance and business processes. We will notify you of any modifications to this Privacy Policy that may materially affect the way we handle your personal information.

By accessing or using the Websites and/or by continuing to conduct business with ivari, you indicate that you understand, accept, and consent to the practices described in this Privacy Policy.

Except as indicated in this Privacy Policy, if you do not consent to ivari's policies and practices, it is your choice not to use our Websites and/or not conduct business with ivari.



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Accountability

ivari is responsible for personal information under its control. ivari's Privacy Office is responsible for maintaining ivari's Privacy Program and responding to privacy inquiries.

In Canada, "Personal information" means any information that relates to an actual person and permits or leads to the possible identification (directly or indirectly) of that person, whether alone or when combined with information from sources otherwise available, including sources publicly available.

When you give consent

We require your consent to collect, use and transfer your personal information, except as otherwise authorized by law. When you give us your consent, we collect, use, transfer and maintain your personal information in accordance with this Privacy Policy and as needed for the purposes specified below.

If we collect, use and transfer your personal information for optional purposes not specified in this Privacy Policy, we will obtain your consent separately for such purposes. You may decline to give your consent or later withdraw your consent to any optional purpose without affecting your ivari policy. No matter the purpose, we will maintain and safeguard your personal information in accordance with this Privacy Policy.

Withdrawing your consent

You may ask to withdraw your consent to any collection, use and transfer of your personal information at any time. If you do so, we may not be able to continue to provide you with our insurance products and services, or other benefits made available by us to you. We will provide an explanation of the impact of your decision.

In some situations, we may not accommodate your withdrawal of consent due to legal obligations and contractual restrictions.

For more information or to withdraw your consent, please contact ivari's Privacy Office address.

Why we collect and use your personal information

We collect and use your personal information for the following purposes:

- Verifying your identity
- Evaluating your insurance application and any in-force applications or forms
- Administering and servicing the products ivari provides to you
- Supporting business operations necessary for us to conduct business
- Conducting investigations and analyzing claims
- Improving the products and services we offer including through research and analytics
- Communicating with you about other ivari products and services
- Complying with our legal and regulatory obligations (such as tax reporting, compliance with anti-money laundering and anti-terrorist financing laws, prudential and market conduct laws, and unclaimed property laws), and/or any legal or regulatory orders (i.e., a court order, subpoena)

The personal information we collect and use

The personal information we may collect and use includes:

- Financial information (i.e., information about your income and sources of funds, information relating to your tax residency, credit bureau information including past or current bankruptcies, and payment details)
- Insurance coverage from other insurers, existing account or policy information with ivari

- Health and/or medical information (including medical and laboratory test results, clinical records, family medical histories, drug prescriptions, and treatment plans)
- Information about your lifestyle (e.g., smoking, alcohol consumption, substance use/abuse, travel plans, and/or participation in high-risk activities)
- Current age, date of birth, sex at birth, gender, and family and/or marital status
- Government-issued identification documents (e.g., birth and death certificates, driver's license, passport, Social Insurance Number (SIN))
- Residency information, immigration and citizenship status
- Employment information (i.e., name of employer, occupation, salary, and benefits)
- Character, general reputation, personal characteristics, and connections to certain individuals
- Name, contact information (i.e., full legal name, residential and/or mailing addresses, phone number, and email address), and authentication details (i.e., passwords, Personal Identification Numbers (PINs), and answers to our identity authentication questions)
- Information provided through your interactions and communications with us and our Websites

This list is not exhaustive and is intended to provide examples of what personal information we collect. What and how much we collect depends upon the product or service that we provide to you. We collect personal information as needed for the purposes specified in this Privacy Policy.

Where we collect your personal information from

We collect personal information when you start an insurance application with ivari and from time to time throughout the duration of your contract with ivari in accordance with the consents you provide or ivari's obligations. In particular, we collect your personal information from:

- Insurance applications, forms, questionnaires, and supporting documentation disclosed or submitted by you, your authorized representative(s), or your contacts in respect of an ivari policy
- Information disclosed by you when communicating with us, including via email, phone, online, or interacting with our Websites
- Your independent insurance advisor(s) and their supporting associates, which may include their managing general agency (or other distributor), market intermediaries, and their employees and subcontractors
- Public sources, such as government agencies, registries, social media, and Websites
- Third parties that we work with to administer and service the policy, including address and identity verification service providers
- Any other sources as authorized by you in respect of the policy

We may also collect your personal information from the following external sources:

- Physicians, other medical and health providers and/or facilities, and related service providers
- Your health and medical records from the provincial public health authority
- Other insurance companies to whom you may apply for life or health insurance, or to whom a claim for benefits may be submitted
- Investigative agencies (i.e. when investigating a claim made under the policy)
- Consumer and credit reporting agencies, including credit bureaus
- Law enforcement, motor vehicle and driver record authorities, funeral homes, coroner's offices, and other governmental agencies or registries in any relevant jurisdictions

- Medical Information Bureau, LLC or “MIB, LLC” (see “Notice regarding MIB, LLC” for details)
- Any other sources as authorized by you in respect of the ivari policy

These lists are not exhaustive and are intended to provide examples of sources of personal information. We collect personal information as needed for the purposes specified in this Privacy Policy.

You have choices regarding some of our collections of personal information:

- **Collection of SINs:** It is generally optional to provide your Social Insurance Number (SIN). However, if you have a universal life policy, a policy with cash value, or an individual variable insurance contract, then we will need to obtain your SIN before we can process certain transactions requested by you, as required by tax legislation. If you decide to provide your SIN, then we may use it as necessary for the purposes described in this Privacy Policy.
- **Phone calls:** Your calls may be recorded in order to document the information you provide and to monitor and improve our customer service. If you don’t want your calls recorded, please contact us in writing.
- **Cookies:** We may send cookies to visitors of our Websites. You can select your preferred cookie settings in our cookie consent manager.

Transfers of personal information to third parties

If required for the purposes described in this Privacy Policy, we may share your personal information with:

- Trusted third-party processors retained by ivari to assist in administering ivari policies and contracts
- Third party service providers, including consultants or consulting firms, information technology services and products companies, cloud, web hosting, data analytics, processing and management services, and similar service providers retained by ivari to support business operations
- ivari’s affiliates and reinsurers
- Your independent insurance advisor, their supporting associates, which may include their managing general agency (or other distributor), market intermediaries, and their employees and subcontractors – however, we will not share any personal information collected for the purposes of underwriting and claims analysis, unless you expressly consent to this transfer.
- Your financial institution, for the purpose of processing your pre-authorized debit payments, if you sign the Pre-Authorized Debit (PAD) agreement with ivari
- Other insurance companies to whom you may apply for life or health insurance, or to whom a claim for benefits may be submitted
- MIB, LLC (see “Notice regarding MIB, LLC” for details)

In some situations, your personal information may be shared with:

- Your beneficiaries and assignees, to the extent required in respect of their interest in the policy, or as otherwise permitted by law
- Your family physician or treating medical practitioner, to the extent we believe it is for your benefit or safety
- Other persons authorized by you or by law, but only to the extent permitted by you or by law

Your personal information may also be released:

- In cases of suspected criminal activity, financial abuse, contravention of law, for the detection and prevention of fraud, if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of you or of others (for instance, by disclosing to an investigative body, legal, or regulatory authorities)

- To comply with a court order, search warrant, or other demand or inquiry from a legal or regulatory authority, or to initiate or respond to any legal proceeding
- To a buyer or other successor, in the event of a merger, divestiture, restructure, reorganization, sale or transfer of some or all of our assets, or other corporate change, in which your personal information is among the assets transferred, to the extent required for the purposes of such transaction or corporate change or to the extent permitted by applicable law

Please note that we will never sell your personal information.

Information may be located outside of your jurisdiction

We and our third-party processors/service providers may conduct operations outside of your jurisdiction. Your personal information may be used, stored, or accessed in these other jurisdictions and may be subject to the laws of those jurisdictions. For example, personal information may be disclosed in response to demands or requests from governments, regulators, courts, or law enforcement agencies in those jurisdictions. When your personal information is transferred to a different jurisdiction, we will take steps to protect your information in accordance with applicable data protection laws and this Privacy Policy.

Notice regarding MIB, LLC

Information regarding your insurability will be treated as confidential. ivari or its reinsurers may, however, make a brief report thereon to Medical Information Bureau, or MIB, LLC, a not-for-profit membership organization of insurance companies, which operates an information exchange on behalf of its members.

Personal information disclosed to MIB, LLC may include your name, birth jurisdiction, occupation and any other information used to determine your insurability. If you apply to another MIB member company for life or health insurance coverage, or a claim for benefits is submitted to such a company, MIB, upon request, will supply such company with the information about you in its file.

MIB receives personal information about Canadian consumers, and the collection, use and disclosure of such information is governed by the *Personal Information Protection and Electronic Documents Act* (PIPEDA) and provincial laws, as may be amended or replaced from time to time. If a brief report is made to MIB by a company, then it will be stored and safeguarded for such period as may be allowed by law.

MIB has agreed to protect such information in a manner that is substantially similar to the privacy and security practices of MIB's Canadian member companies, and in accordance with applicable laws. As a U.S. based company, MIB is bound by, and such personal information may be disclosed in accordance, with applicable U.S. laws. An individual's consumer file at MIB may be accessible to U.S. law enforcement and U.S. national security authorities for anti-terrorist and clandestine intelligence investigations, provided that such authorities comply with the consumer privacy protections specified in applicable U.S. laws. **To review MIB's Consumer Privacy Policy, please visit: (<https://www.mib.com/privacy-policy.html>).**

Upon receipt of a request from you, MIB will arrange disclosure of any information in your file. Please contact MIB by emailing Canadadisclosure@mib.com or calling 866-692-6901. If you question the accuracy of the information in MIB's file, you may contact MIB and seek a correction in accordance with the procedures set forth in the federal *Fair Credit Reporting Act*. The address of MIB's information office is 50 Braintree Hill Park, Suite 400 Braintree, MA 02184- 8734.

ivari, and its reinsurers, may also release information from its file to other insurance companies to whom you may apply for life or health insurance, or to whom a claim for benefits may be submitted. Information for consumers about MIB may be obtained on its website at www.mib.com.

How we protect your personal information

When you apply for ivari products or services, we create and maintain a client file that includes your personal information and is maintained on our systems. We have physical, electronic and administrative safeguards in place to prevent unauthorized access, transfer, use, or loss of your personal information.

To safeguard your personal information, we:

- Use technology, such as firewalls, anti-virus software, and passwords
- Develop and comply with internal privacy policies and procedures to protect personal information, respond to privacy questions, complaints or breaches, and destroy information that is no longer required
- Regularly review and update our policies
- Regularly update internal access levels to match the sensitivity of the information
- Administer regular employee privacy training

We will access and use your personal information only as required to carry out our work or contractual or legal responsibilities in relation to the purposes described in this Privacy Policy. Our employees and third parties are also required to protect the confidentiality of your personal information in accordance with this Privacy Policy, ivari's privacy and security practices, and applicable Canadian and provincial privacy laws.

How long ivari retains your personal information

We will only keep your personal information for as long as it is needed for the purposes described in this Privacy Policy, or as required by applicable Canadian laws or guidelines. The length of time we keep personal information depends upon the product or service that we provide to you and the nature of the information and may extend beyond the end of your relationship with ivari.

When such personal information is no longer required, we have procedures in place to destroy, delete, erase or convert it to an anonymous form so that it can no longer be associated with you. **We reserve the right to use such anonymous data for any legitimate business purpose without further notice to you or without further your consent.**

Know your risks

While we have safeguards to protect your personal information, in the event of an unauthorized access, use, disclosure, or loss of your personal information (a "data security incident"), ivari will follow all steps required by applicable privacy laws in the event of a data security incident, including, as applicable, notifying any affected individuals, suggesting steps to reduce risk of harm, and reporting the incident to the appropriate regulatory authorities.

We also ask you to contact us immediately if you are affected by identity theft or other data security incidents so we can help you protect the information in your ivari file.

Automated Decision-Making Processes

The personal information provided in your insurance application may go through an automated decision-making process to determine your eligibility for the insurance applied for. If you would like more information and/or to submit observations regarding the automated decision, please contact ivari's Privacy Office.

For simplified or guaranteed issue life insurance products: The decision to issue or decline, as well as the decision on the type and amount of coverage to issue, is based exclusively on automated processing of your personal information.

For all other insurance policies: Automated decision-making is not used to decline insurance coverage, or to issue coverage that is different than what was applied for.

Your right to request access to your personal information

You have the right to request access to your personal information at any time.

In some situations, we may not be able to provide you with all your personal information.

To access your personal information, please contact the Privacy Office at the address below.

Accuracy of personal information

We make efforts to collect and keep your information accurate and up to date as is necessary for ivari's purposes. It is your responsibility to update us about any changes to your personal information as soon as possible so that we may appropriately administer and service your policy.

In the event our records contain inaccurate or incomplete information about you, you have the right to request corrections by ivari. To do so, please contact the Privacy Office at the address below.

In some situations, we may not accommodate a request to change information.

Contacting the Privacy Office

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

Chief Privacy 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)

To help us respond to your message, please provide your name, contact information, and any details relevant to your request, including the name of the department or person you have already contacted at ivari.

Cookies

ivari uses cookies and web beacons on our websites (together, "Cookies"). Where required by applicable law, we will not activate certain Cookies without your consent.

Social media

ivari is active on social media and you may interact with us on these platforms. These social media platforms have their own privacy policies, cookie policies, and terms of use. We are not affiliated with the providers of the social media platforms we use. Content that you post may not be private and may be seen by others who use the platform. We advise you to read the privacy policies, cookies policies, and terms of use of these platforms before using them and posting any personal information.

Third-Party Links

ivari's Websites may include links to third-party websites, plug-ins, services, social networks, or applications. Clicking on those links or enabling those connections may allow the third party to collect or share data about you.

If you follow a link to a third-party website or engage a third-party plugin, please note that this Privacy Policy does not apply to information that you provide to or is collected by such third parties through any content that may link to or be accessible from the website. These third parties may have their own privacy policies and we do not accept any responsibility or liability for the actions or policies of third parties. We do not control these third-party websites, and we encourage you to read the privacy policy of every website you visit.

With a national network of thousands of independent, professional advisors, ivari provides a full range of insurance products to help Canadians make the right choice for their protection needs.

The people, products and service that make up ivari have stood the test of time and have been in the Canadian marketplace since 1928. We are committed to being approachable and transparent in everything we do, and we will stand by our word. Visit us at ivari.ca.

Like us. Follow us. Share us.



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