

# SEB PRIVACY POLICY

SEB Administrative Services Inc. (SEB) is committed to protecting your privacy. This Privacy Policy explains our information processing practices. It applies to any personal information you provide to SEB Administrative Services Inc. and, subject to local law, any personal information we collect from other sources.

Throughout this Policy, "SEB" refers to SEB Administrative Services Inc., including its affiliated companies and subsidiaries (also referred to as "we", "us", or "our").

This Privacy Policy describes the principles that we follow to ensure that we protect Personal Information that we receive, collect, use or disclose in the course of carrying on our business. All of our employees who have access to Personal Information must adhere to this Privacy Policy and related procedures. To this end, we have appointed a Chief Privacy Officer to ensure compliance by all SEB employees and to address privacy concerns.

By submitting your Personal Information to us through your use of our website or otherwise, you signify your consent to the collection, use and disclosure of your Personal Information in accordance with this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not provide any Personal Information to us through the website or any other manner.

## ACCOUNTABILITY

We have designated a Chief Privacy Officer. The Chief Privacy Officer is ultimately responsible for Personal Information under our control and is accountable for compliance with the terms and procedures of this Privacy Policy. Any individual that has questions regarding our procedures or wishes to make a complaint about our Personal Information handling practices should contact the Chief Privacy Officer. For contact information, please refer to the heading Contact Us below.

## WHAT IS PERSONAL INFORMATION

"Personal Information" is information about an identifiable individual. However, it generally does not include business contact information when used to contact a person in respect of their business role or function. Sometimes we will de-identify information in order to use and share that information for our business purposes in a way that does not identify you. For example, we may aggregate your personal information with other individuals to prepare claims statistics.

## WHY WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION

Collecting personal information about you is essential to our being able to provide the products and services that best meet your needs (including individuals associated with you, all of whom we refer to as client in this Privacy Policy). While the personal information we collect may come directly from you, it may also be provided by our affiliates or other third parties (such as employers, insurance companies, insurance brokers or agents, credit organizations, motor vehicle and driver licensing authorities, financial institutions, medical professionals, etc.).

Personal information may be used for the following purposes:

- To determine eligibility and process applications for products and services and to provide information and services
- To understand and assess ongoing needs of Clients and potential Clients and offer products and services to meet those needs
- For communication, service, marketing, billing and administration
- For claims administration and data analysis
- For fraud detection and prevention
- For analytics purposes
- To develop proprietary tools and databases
- To provide consulting services to insurance companies
- To comply with legal, audit, security and regulatory requirements
- To obtain and update credit information with appropriate third parties, such as credit reporting agencies, where transactions are made on credit
- Other purposes disclosed in our terms of business or disclosed to you at the time of collection, use or disclosure.

## WHAT INFORMATION WE COLLECT

Depending on the products or services you request, we may collect information that you provide on applications for products and services, such as your contact information, age, health conditions, financial information, employment history, and income information. To assess risk or if you make a claim, we may collect information from insurers, industry associations, claims adjusters, and consumer reporting agencies.

We may also automatically collect information through our marketing programs through the use of cookies, beacons and

other technologies that track how you use our website and marketing communications. Please review the SEB Cookie Policy for more information.

## **CONSENT TO USE PERSONAL INFORMATION**

We may obtain your express consent or we may determine that consent has been implied by the circumstances. Express consent can be verbal (in person or over the telephone), written or by electronic application (including email). Implied consent occurs when we can assume you have given consent by some other action you take or decide not to take. For example, if you request a specific product or service and provide us personal information in that regard, we infer that you consent to us using that personal information reasonably to provide this service.

If you need to provide personal information about other individuals (such as employees, dependents, etc.), you must obtain their consent for these purposes prior to your disclosure to us.

When you request services from us, we ask that you provide information that enables us to respond to your request. In doing so, you consent to our collection, use and disclosure to appropriate third parties of such personal information for these purposes. You also authorize us to use and retain this personal information for as long as it may be required for the purposes described above. Your consent remains valid even after the termination of our relationship with you, unless you provide us with written notice that such consent is withdrawn; and then subject to legal or contractual restrictions and reasonable notice. You should note that by withdrawing your consent, or not providing it in the first place, you may limit or even prevent us from being able to provide you or an authorized third party (such as an employer) with the products or services desired. However, we may collect, use or disclose Personal Information without an individual's knowledge or consent in exceptional circumstances where such collection, use or disclosure is permitted or required by law, or where you violate our Website Terms of Use.

In certain circumstances, refusing to provide personal information or withdrawing consent will mean that you will not be entitled to insurance policy issuance or renewal, insurance underwriting or claims administration of existing policies. Additionally in certain circumstances, we will not need to obtain consent or explain the purposes for the collection, use or disclosure of personal information. For example, this exception would apply if there is an emergency that threatens the life, health or security of an individual, for fraud detection or prevention, or if we must comply with a court order.

## **SHARING PERSONAL INFORMATION WITH OTHERS**

SEB only discloses personal information as is required and described in this Policy or as otherwise required by law. In providing our services, we may need to disclose the personal information we collect to affiliates, subsidiaries, successors and other service providers or agents who perform various functions for us. Such parties may be located in Canada, or in other jurisdictions outside of Canada. While your personal information is always subject to confidentiality obligations, while stored in another jurisdiction, it may be subject to the laws of that jurisdiction.

Depending on the products or services that we provide to you, we may disclose personal information to insurance companies, reinsurers and other parties who have a need for the information in order to make available insurance coverage and other products and services. We also share information with claims adjusters and insurers in order to settle claims. If we are legally entitled to do so, we may share information with consumer reporting agencies, insurance reporting agencies and governmental authorities when requested to do so or in order to protect our business. We may also be required by law or by rules of arbitration or rules of court to share information.

SEB develops and uses proprietary platforms and databases to gather, store and use information about insurance policies, including, but not limited to, names, industry codes, policy types, premium and policy expiration dates as well as information about the insurance companies that provide coverage to its clients or compete for its clients insurance placements. SEB uses and combines this information and other information collected from SEBs clients for the purposes of developing SEBs products and services and SEBs relationship with its clients (for example: benchmarking, market research, data analysis, and marketing of products and services that may be of interest to SEBs clients) and to help insurance companies to strengthen their offerings for SEBs clients. The databases may be accessed by SEB and SEB affiliates to provide consulting or other services to insurance companies for compensation as well as for other purposes described in this Privacy Policy.

As SEB continues to develop and grow, we may buy or sell parts of a business. As our businesses consist primarily of client relationships, information regarding the particular accounts or services being purchased or sold could include personal information and be one of the transferred business assets. We may also use this personal information to assess your future needs and to offer the products and services that may best meet those needs, from ourselves, our affiliates or reputable organizations selected by us. If you do not wish to receive these offers or such information, please contact our Privacy Officer as outlined below in the Contact Information section.

## **KEEPING INFORMATION ACCURATE**

It is important that your personal information is accurate and complete. Having accurate information about you enables us to give you the best possible service. You have the right to access, verify and amend the information we have about you. If you identify any personal information that is out-of-date, incorrect or incomplete, let us know and we will make the corrections promptly. To keep personal information up-to-date, please inform us of any changes, such as a change of address, telephone number or any other circumstances by contacting your local office representative.

## **HOW WE SAFEGUARD PERSONAL INFORMATION**

We will use reasonable efforts and security measures to protect Personal Information against loss or theft, as well as unauthorized access, use and disclosure. We have controls in place to maintain the security of our information and information systems. Files containing Personal Information are stored according to the sensitivity of the information contained therein and are backed up at offsite locations. Appropriate technological controls (such as passwords, encryption, firewalls) are placed on our computer systems and data processing procedures. Physical controls (such as locked filing cabinets, restricting access to offices, alarm systems) are in place as are organizational controls (such as staff training and access on a need to know basis).

We may store and process your Personal Information at our offices in Canada, or elsewhere, including outside Canada. To the extent we employ third-party service providers to store, access, handle or process Personal Information on our behalf; we will use contractual and other means in an attempt to provide a comparable level of protection. Service providers, however, may be located in various countries, so please be aware that authorized officials of governments in those countries may be lawfully able to access your Personal Information without your knowledge or consent pursuant to the laws of such countries.

Employees are governed by strict standards and policies to ensure that personal information is secure and treated with the utmost care and respect.

## **ONLINE PRIVACY**

SEB may collect user information from its websites, including the FlexPlus Direct Website (for example, via cookies which are alphanumeric identifiers transmitted from a website to a visitor's browser and IP address or web beacons that detect when you take actions on our websites). This means that the information collected cannot be traced back to a specific person. For example, our web servers may record certain information automatically when you visit our website. This information is collected using cookies and might include the pages you visited, your IP (Internet Protocol) address and other site usage statistics. This anonymous information is used for research and analytical purposes only (like evaluating how many visitors our website receives, which pages are visited most often or to provide users with a customized online experience and to find ways to improve our site and marketing communications). It does not reveal any Personal Information about you, the user. This aggregate data may be disclosed to third parties, but never with personally identifying information. Cookies are small text files that contain a unique identification number that allows our computers to identify your web browser (but not you) each time you visit our website. The information helps us improve the functionality of the site and enhance the navigation and security of your session. Most major websites use this technology and most browsers are set up to accept them. Please refer to the SEB Cookie Policy for information about cookies and how we use them. Although cookies are widely used, it may be possible to disable cookies via your browser settings. You may also opt-out of third-party cookies and beacons by visiting [www.youradchoices.ca](http://www.youradchoices.ca). However, in so doing, some websites may not function properly or optimally.

SEB may send you commercial electronic messages to an email address or other electronic address that you have provided to us. We may ask for your express consent or we may rely on implied consent if you have made an inquiry, purchased a product or service from us, entered into a written agreement with us, or in other limited circumstances. If you do not wish to receive commercial electronic messages from us, you may withdraw your consent at any time using the unsubscribe link in the message or by contacting our Privacy Officer as indicated below. Please note that you will still receive commercial electronic messages that we are required to send to you by law or for which consent is not required, such as confirmations of transactions or information about your account.

SEB websites may contain links to other third party sites that are not governed by our Privacy Policy. Although we endeavor to link only to sites with high privacy standards, our Privacy Policy will no longer apply once you leave this website. We are not responsible for privacy policies employed by other third parties or any foreign affiliates, since they would be governed by privacy legislation applicable in their country of residence. We suggest, therefore, that you examine the privacy statements of those sites to learn how Personal Information may be collected, used and/or disclosed.

## **DOES SEB COLLECT INFORMATION FROM CHILDREN?**

Our websites are not directed to children and we do not knowingly collect personal information from children on our websites. By using our website, you represent that you are at least the age of majority in your state or province of residence, or that you are the age of majority in your state or province of residence and you have authority to submit any information submitted on behalf of any of your minor dependents.

## **ADDRESSING COMPLAINTS AND SUGGESTIONS**

You may ask questions about our compliance with this Privacy Policy. We have policies and procedures to receive, investigate and respond to complaints and questions regarding this Privacy Policy and our receipt, collection, use and disclosure of Personal Information. Complaints will be investigated and where a complaint is found to be justified, we will take appropriate measures, including amending our policies and practices, when necessary. You may contact our Chief Privacy Officer to make a complaint, express any concerns or to request access to your Personal Information.

## **CONTACT US**

If you have any questions relating to this Policy, please contact us at the SEB Privacy Office, 5500 Explorer Dr., Mississauga, ON L4W 5C7, attention: Chief Privacy Officer, or email us at [webmaster@seb-admin.com](mailto:webmaster@seb-admin.com).

## **CHANGES TO THIS POLICY**

We reserve the right to modify this Privacy Policy at any time, so please review it frequently. Changes and clarifications will take effect immediately upon their posting on our website. If we make material changes to this Privacy Policy, we will notify you here that it has been updated, so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we use and/or disclose it. If our company is acquired or merged with another company, your information may be transferred to the new owners so that we or the new owners may continue to provide services to you.