



## Privacy Policy

### **Our commitment to our advisors, our insurance suppliers and their customers:**

In order to provide advisors and their customers with access to insurance products and services, we collect certain personal information about both, generally on behalf of our insurance providers. Our commitment goes beyond meeting legal requirements for protecting personal information. The trust and confidence that our advisors and insurers hold in us, including our ability to protect the confidentiality of personal information and the privacy of the individuals who provide it, are critical to our success as a business. This policy applies to our employees, our Associate General Agents (AGAs) and any third-party service providers or representatives with which we contract.

### **Why we collect, use and retain personal information:**

We act as an intermediary between insurance brokers and AGAs and the insurance companies with which they do business, contracted by insurers to operate on their behalf to facilitate sales and support of life and health insurance and investment products. Insurers' privacy policies sometimes identify us as "service providers." Insurers require us to obtain, use and retain certain essential personal information about advisors in order to determine their initial and ongoing suitability to act as an advisor, to obtain contracts for them to distribute products and in order to compensate them. This information includes financial and work history as well as disciplinary, legal and regulatory information. We obtain customer information from advisors in order to provide services and access to insurers' products. Our policies must meet the standards insurers establish. The personal information advisors collect from customers and provide to us for submission to insurers is essential information that insurers use to provide services and products that customers have requested. This information is used to determine insurance risk, assess eligibility for products, to administer those products once purchased and to fulfill certain regulatory requirements. This can include health information, financial information and history and information about avocations. We retain some of this information in order to be able to administer business, to provide ongoing service to advisors and insurers and when we are required to do so by law. We may use anonymous data to manage our business, identify products and services that will benefit Advisors and their customers and to prepare reports about our business.

### **Limiting collection:**

We collect only the information we need to fulfill our contracts with advisors and insurers and to meet our regulatory obligations. We will use only fair and lawful means to collect this information.

### **How we collect customers' information:**

Wherever possible, we collect customers' information directly from the advisor as their authorized representative. Information may be obtained through government agencies, other insurers and financial institutions. We may collect any required health information about customers from the advisor or directly from the customer. Third party service providers and other authorized representatives may also collect this information on our behalf. We will collect the advisor's personal information directly from the advisor, other insurers and insurance organizations, government agencies and existing and past employers.

### **Consent:**

We will collect information only with consent, whether express or implied. The customer consent that insurers receive often includes consent to provide personal information to us, which allows us to fulfill our contractual obligations to the insurer. We also operate under the customer consent that advisors receive in order to support their sales activities. We may rely on implied customer consent when an advisor receives a customer's consent to collect personal information in connection with a purchase or policy change and when we process customer information requested by an Insurer and collected by an advisor. We receive express advisor consent to obtain their personal information in the course of screening and contracting. When an advisor or customer requests or uses any of the products or services we make available, we will transfer whatever information is necessary by implied consent. If we receive notice from an insurer that an advisor or customer has withdrawn consent for the continued use and retention of personal information, we will take whatever steps are necessary to adhere to the Act. This may require termination of our relationship with the Advisor. We will act on whatever instructions we receive from the insurer regarding the customer's status.

### **Limits on use and disclosure:**

We will use and disclose personal information to perform our contractual duties, to provide you with information and when we are required to do so by law. We may disclose this personal information to our employees or service providers so that they can perform their duties, to insurers and any person or organization to which consent has been given and where authorized by law. Where personal information is provided to service providers, we require them to protect that information consistent with our policies and practices. We may also use personal information to offer products and services that we believe will interest advisors or customers, but we will never give or sell personal information to third parties for marketing purposes.

### **Limits on retention and Destructions of Personal information:**

Personal Information shall be retained only for as long as needed to fulfill the purposes for which it was collected. Two exceptions to this requirement are (i) if the individual consents to a longer retention period, or (ii) if longer retention is required by Law. Personal information that is no longer required to fulfil the identified purposes should be destroyed, erased, or made anonymous.

The Policy for retention and destruction of customer personal information is a minimum retention period is 3 years and a maximum retention period of 10 years from the termination of client relationship. This is to ensure OM Financial Inc.'s Compliance with PIPEDA.

OM Financial Inc. mainly uses Virtgate as our back-office system. Our offices do not keep physical copies containing advisor and/or clients' confidential information. Documents printed and used on a daily basis and any other documents containing personal information are destroyed at the end of the day using our in-office shredder and are discarded accordingly.

### **Accuracy of information:**

It is the Advisor's responsibility to keep the personal information we obtain about the Advisor and customer as accurate and up-to-date as possible. Both the insurer and the Advisor are responsible for providing us with notices of changes that they receive directly. An individual may challenge the completeness and accuracy of his/her personal information that we hold. We will make any necessary corrections to information about an Advisor that is shown to be incomplete or inaccurate and we will notify any third parties, including insurers, if we agree to make such corrections. Customers may gain

access to their personal information we hold by making an access request to the advisor and/or insurer on whose behalf we hold the information. In situations where a customer seeks corrections to information we hold; we will act on the instructions of the insurer(s) whose products are held and/or the advisor who is their authorized representative, depending on the corrections required. Any disagreement or discrepancy regarding accuracy will be documented.

**Protecting personal information:**

We will protect personal information from unauthorized access or use by ensuring that safeguards are in place, including physical security measures for our locations, operational policies, procedures and access protocols and technological measures for our computer systems. We will use safeguards to prevent unauthorized access to personal information during the destruction process.

**Contact Us:**

If you have any questions or concerns regarding this Policy or how we manage your personal information, please contact the Compliance Officer at the OM Financial Inc office which can be obtained from our Website ([www.omfinancial.com](http://www.omfinancial.com)) Please note that any complaint should be directed in writing.

**Contact the Privacy Commissioner of Canada:**

The Commissioner encourages individuals to attempt to discuss concerns directly with the organization first. Hours of service are from 8:30 a.m. to 4:30 p.m.

Toll-free: 1-800-282-1376

Phone: (819) 994-5444

Fax: (819) 994-6591

[www.priv.gc.ca](http://www.priv.gc.ca)