

RSA Canada[†]
PROTECTING CUSTOMER* PRIVACY

PRIVACY POLICY

RSA Canada is committed to protecting your privacy and the confidentiality of your personal information. Personal information about an identifiable customer ("Personal Information") will be collected, used or disclosed only in accordance with this Privacy Policy.

IDENTIFIED PURPOSES

We collect, use and disclose Personal Information (including to and from your broker, our affiliates and/or subsidiaries and/or third party providers/suppliers) for the following purposes:

- Offering and providing insurance quotes, policies, and related products and services to you;
- Administering and processing insurance products and services;
- Establishing and maintaining communications with you;
- Verifying your identity and the accuracy of your Personal Information through, for example, the exchange of information with government agencies, industry associations, property and motor vehicle information databases, brokers or other insurers;
- Analyzing, assessing, underwriting and reinsuring risks on a prudent basis;
- Determining and facilitating your payment of fees and premiums;
- Investigating and settling claims;
- Detecting and preventing fraud or other illegal activities;
- Compiling statistics and reporting to regulatory or industry entities in accordance with prudent insurance practices;
- Gathering your feedback to help us improve our products and services.
- Complying with the law or the requests of law enforcement agencies or regulators; and
- Notifying you of products or services that might be of interest to you.

In this Privacy Policy, the above list of identified purposes will be referred to as the "Identified Purposes".

CONSENT

It is important that you understand and consent to our collection, use and disclosure of your Personal Information. We rely on the following actions by you as indications of your consent to our existing and future use of your Personal Information for Identified Purposes, until you notify us of a withdrawal of your consent:

- Your voluntary provision of Personal Information directly to us or through an insurance broker or representative for the purpose of acquiring an insurance contract or related service or product (including information previously provided to us);
- Your express consent or acknowledgement contained, for example, within a written, verbal or electronic application process;
- Your consent solicited by us (or our agent) for a specified purpose;
- Your receipt of this Privacy Policy; or
- Your consent given through your authorized representative such as a legal guardian, agent or holder of a power of attorney.

By providing Personal Information about a third party such as a family member, director, officer, or employee by any of the above methods, you represent that you have obtained their consent to the collection, use, and disclosure of such Personal Information in accordance with this Privacy Policy.

In the event you request changes, endorsements, or renewals to your policy, the original consent provided directly to us, or indirectly through a third party, will remain in effect.

We may use nominal personal information such as your name and address for marketing initiatives unrelated to your insurance coverage afforded by us.

WITHDRAWAL OF CONSENT

Subject to certain legal or contractual restrictions and reasonable notice, you may withdraw your consent at any time. If you wish to withdraw your consent for the use of your personal information for all or part of the above purposes, please call us at **1-888-877-1710**.

In some cases, refusing to provide certain Personal Information or withdrawing consent for us to collect, use or disclose your Personal Information could mean that we cannot provide you with, or continue to provide you with, insurance coverage or other requested products, services or information. We will inform you of any consequences of withdrawing your consent.

LIMITING COLLECTION AND RETENTION OF PERSONAL INFORMATION

We will only collect, use, or disclose Personal Information that is necessary for the Identified Purposes. We will retain your Personal Information only as long as necessary to accomplish the identified Purposes or to satisfy our legal or business obligations.

ACCURACY

We will keep your Personal Information as accurate, complete, and up-to-date as is necessary for the Identified Purposes.

SAFEGUARDS

We will protect your Personal Information by various physical, technological, and organizational safeguards. When your Personal Information is no longer needed, security safeguards will also be employed to ensure the safe destruction of your Personal Information. We will use contractual and other means to control the use and disclosure of your Personal Information by third parties.

We or service providers acting on our behalf may process and/or store some or all of your Personal Information in jurisdictions outside of Canada, including the United States. You should note that some jurisdictions outside of Canada may not have laws that provide privacy protections that are substantially similar to those in Canada.

ACCOUNTABILITY, OPENNESS AND CUSTOMER ACCESS

We are responsible for all Personal Information under our control and have designated a Privacy Officer who is accountable to Senior Management for our compliance with this Privacy Policy.

If you would like more information regarding this Privacy Policy or your Personal Information, please call us at **1-888-877-1710**. When you call us, we may confirm your identity by asking you to confirm certain Personal Information and you may be directed to send us certain requests in writing.

This Privacy Policy may change from time to time. You can view the latest version by visiting our website.

CHALLENGING COMPLIANCE

If you have a complaint regarding our compliance with our Privacy Policy or procedures, please contact our Privacy Officer who will investigate your complaint. If you are not satisfied with our response to a privacy related inquiry or complaint, you may contact the Office of the Privacy Commissioner of Canada, or your provincial privacy commissioner, if applicable. We would be happy to provide their contact information upon request.

[†] RSA Canada includes Royal & Sun Alliance Insurance Company of Canada (www.rsagroup.ca), Canadian Northern Shield Insurance Company (www.cns.ca), Western Assurance Company (www.westernassurance.ca), Ascentus Insurance Ltd. (www.ascentusinsurance.ca), and Quebec Assurance Company.

* In this Policy, "customer", "you" or "your" includes any individual who has requested, applied for or been supplied with, products or services (including claims services) by us including any other individual for whom the customer has acted as agent, guardian or representative. "We", "our" or "us" means RSA Canada.