



# TW's Privacy Commitment to You

At TW, respecting your privacy and protecting your personal information is an important part of how we do business. We value the trust you have in us and we are committed to protecting your privacy.

## TW's Privacy Policy

TW is committed to keeping our clients' personal information confidential and secure.

- 1. Accountability** - We are accountable for all personal information in TW's possession or control, including any personal information transferred to third parties for processing.
- 2. Identifying the purposes for which information is collected** - We will identify the reasons for collecting personal information before or at the time of collection. We will collect information for purposes that a reasonable person would consider appropriate. In addition to one's name, address and telephone number, we may require information to:
  - establish one's identity
  - understand one's needs and eligibility for products, services and benefits
  - recommend products, services and coverage to meet one's needs
  - make individuals aware of new products, services and benefits
  - provide individuals with ongoing services, establish and maintain communications and respond to enquiries
  - enable us to acquire or renew an insurance policy
  - draft billings and conduct accounting services related to our products, services and benefits
  - conduct research and statistical analysis
  - protect individuals and us from error or fraud
  - comply with legal requirements
- 3. Obtaining consent** - We will obtain consent before or when we collect, use or disclose personal information, subject to certain legal, medical or security reasons that would make it impracticable to seek consent. An individual can provide consent to the collection, use and disclosure of personal information about them expressly (verbal or written) or it may be implied depending on the circumstances and sensitivity of the information. An individual can withdraw consent at any time. If this should happen, we will explain the implications of withdrawing consent.

When quoting or issuing a policy, it is our understanding that in addition to the member providing their consent, they have obtained consent from all persons named in the insurance policy for the collection, use and disclosure of their personal information, for the purposes outlined above.

**4. Limiting the collection of personal information** - We will limit the collection of personal information to only that which is needed to properly provide products, services and benefits and to fulfill legal or regulatory requirements. Information will be collected by fair and lawful means. We may collect information via telephone recording and if so, we will advise in advance and explain the purpose of the recording (e.g. quality and training).

The information we gather about our clients varies, depending on the request. Examples of the types of information we may collect include but is not limited to:

- name, address, telephone number and e-mail address
- date of birth, gender, marital status and family details
- driving record, driver's license, vehicle information and proof of ownership
- previous insurance history and claims experience
- details of the property being insured
- details related to any loss or injury
- banking information and credit rating

**5. Limiting the use, disclosure and retention of personal information** - We will use or disclose personal information only for the purpose for which the information was collected, unless an individual gives consent to use or disclose it for another reason. Information may be disclosed to service providers and authorized agents/representatives who perform various functions for us. Individuals' personal information may be provided to:

- employees, agents and representatives who need the information in the performance of their duties
- service providers who need the information in the performance of their duties for us and to satisfy their obligations to us
- any person or organization an individual has provided consent to
- any person or organization authorized by law

When information is provided to our service providers, we will require them to protect the information in a manner that is consistent with our privacy policies and practices. We do not sell individuals' personal information to other organizations and we do not release your information without your consent.

We will keep personal information only as long as necessary for the identified purposes or as required by law.

**6. Keeping personal information accurate** - We will keep the personal information in our possession or control accurate, complete, current and relevant based on the most recent information available to us. Individuals may challenge the accuracy and completeness of personal information about them and have it amended as appropriate. Depending on the nature of the information challenged, amendment involves the correction, deletion or addition of information. Where appropriate the amended information will be transmitted to third parties having access to the information in question.

7. **Safeguarding information** - We protect personal information with safeguards appropriate to the sensitivity of the information. We will protect personal information regardless of its format, against unauthorized access, disclosure, copying, use or modification.

Any unprotected e-mail message may be subject to interception, loss or alteration. TW is not responsible for damages related to e-mail messages sent by members or e-mail messages sent by TW to individuals at their request.

8. **Openness** - We will be open about the procedures used to manage personal information. Upon request, we will inform individuals and employees of our policies and practices for the management of personal information.

9. **Providing access to personal information** - Upon request, we will advise individuals of the existence, use and disclosure of their personal information. Individuals can request to have their information amended or corrected. We will respond to an access to information request within 45 days of receiving a written request. Access to information will be provided at a minimal cost. TW is unable to provide access to information in the following circumstances:

- if doing so would likely reveal personal information about a third party, however, if the third party information can be removed, the remainder of the record can be provided
- if the information is subject to solicitor-client privilege
- if revealing the information would reveal confidential commercial information
- if the information relates to the actual or suspected breach of a policy or other agreement or the breach of a Canadian law
- if the information was generated in the course of a formal dispute resolution process

10. **Questions and/or complaints about privacy** - Individuals may challenge TW's information handling practices and/or TW's compliance with privacy legislation. Privacy complaints and inquiries should be directed to TW's Privacy Officer as outlined in the complaints process.

### **Privacy Complaint Process**

If an individual has a privacy related concern or complaint, the TW employee will listen to the concerns, identify the problem and offer solutions. If the situation cannot be resolved, the individual will be directed to contact TW's Privacy Officer either by telephone or in writing.

To contact TW's Privacy Officer:

TW Privacy Officer  
125 Northfield Drive West  
PO Box 218  
Waterloo ON N2J 3Z9  
1-800-267-6847  
[www.twinsurance.ca](http://www.twinsurance.ca)

Depending on the nature of the inquiry or complaint, the Privacy Officer will:

- acknowledge the inquiry
- investigate the situation
- respond in a timely manner
- answer any questions related to privacy policies
- take measures to modify TW's personal information handling practices if necessary

## **Website Security**

We monitor customer traffic patterns in order to improve site design for our clients. We do not sell, trade or rent personal information to others. We may provide aggregate statistics about our traffic patterns and related site information to reputable third-party vendors, but these statistics will never include any personally identifiable information.

We also use "cookies", as do many other sites. Cookies are small pieces of information that are stored by the browser in the individual user's computer. When a cookie is attached to an individual's system, once the individual has visited a site, the computer stores the information entered and remembers it so the individual does not have to make selections each time they visit the site. Cookies do not have the ability and cannot be used to retrieve any personal information about an individual (e.g., names, ages, addresses, e-mail address, etc.).

Any information we collect (e.g., e-mail address) is protected against any unauthorized access using the most up-to-date technology. We safeguard individuals' information by placing it on the secure portion of our network and not on our Web site, ensuring that individuals' information stays private and protected.

## **Security**

The security of the information individuals provide is important to us. We use technology security measures to ensure that no loss, misuse or alteration of any information under our control occurs.

We understand that keeping your information in strict confidence is important and we are committed to always protecting your privacy. If you have any questions regarding this privacy policy, please contact TW's Privacy Officer at 1-800-267-6847.