



# PRL Privacy Policy

*Purves Redmond Limited (“PRL”, “Us” or “We”) are committed to protecting the privacy and security of your personal information. This Privacy Policy describes the types of information that relates to an identifiable individual (“Personal Information”) that We collect, how we use it, how and when it may be shared, and the rights and choices you have with respect to your Personal Information.*

## SCOPE OF PRIVACY POLICY

This Privacy Policy applies to this website, and any other websites or applications owned and operated by PRL, any services We provide to you, and any Personal Information you provide to PRL or We collect from other sources about you (“PRL Services”), unless you are provided a more specific privacy statement at the time of data collection. By continuing to use PRL Services you acknowledge this Privacy Notice.

## Collection of Personal Information

In order to provide you with Services We may need to collect Personal Information in a number of ways including:

- **Directly from you** or your authorized representative.
- **Other parties related to an insurance transaction** such as insurance companies, premium finance companies, other insurance brokers, employers, benefit plan administrators, or benefit plan sponsors.
- **Publicly available sources** such as claims and convictions records, social media platforms and property and assets registers.
- **Background checks and screening tools** such as motor vehicle and driver licensing authorities, insurance industry fraud prevention and detection databases, credit agencies and sanctions screening tools.

- **Other third parties** such as associations, third party services providers, financial institutions, medical professionals.

## Types of Personal Information Collected

The types of Personal Information We collect will vary depending on the Services we provide, the products, and the type of website being accessed. We may collect and process the following types of personal information:

- **Basic personal information** – such as name, address, telephone number, email address, birth date, and marital status.

- **Identification Details** – such as identification numbers issued by government bodies or agencies (e.g., social insurance number, passport number, driver’s license number).
- **Criminal Record Checks and Background Screening** – such as information about allegations and convictions of crimes and sanctions violations.
- **Policy Information and Claims History** – such as historical information about insurance quotes, policies issued, current and/or previous claims including health data.
- **Financial Information** – such as credit card and bank account numbers and details, income, credit history, and credit score.
- **Employment Information** – such as employer, job title, business address, email and phone numbers.
- **Education Information** – such as current and/or previous education.
- **Driving Record** – such as information about previous accidents, speeding tickets, and the length of time a licence has been issued.
- **Pension and Benefits Information** – including benefit elections, pension entitlement information, number of dependents or beneficiaries, and details regarding power of attorney.
- **Health and Medical Data** – where relevant or required for our Services.
- **Marketing Data** – such as whether or not an individual has consented to receive marketing from Us, interactions with our marketing campaigns, communications, articles, and social media.
- **Site Information** – information related to the operation and use of a site, including information collected through cookie or other tracking technologies.

## Use of Personal Information Collected

We may use Personal Information to:

- Provide you, or third parties on your behalf, with products and services including placement of (re)insurance policies and the ongoing management of such policies, claims processing, consulting and related risk control services, general risk modeling, benchmarking and/or other analytics services.
- Conduct Business Operations such as billing, administration, advertising, marketing and communications, or to assist us in enhancing, expanding or modifying our services.
- Maintain network security and performance.
- Comply with legal, audit, security and regulatory requirements, industry standards, and our own policies.
- Prevent and detect fraud and other legal or policy violations.
- As otherwise described to you at the point of collection or pursuant to your consent.

## Disclosure of Personal Information

We may need to disclose your Personal Information to:

- insurers, third-party agents/brokers and/or other service providers
- your employer, association, group or benefit program sponsor
- agents or third-party service providers
- marketing partners
- successor entities
- anti-fraud databases, supervisory or regulatory authorities and law enforcement agencies

## Consent to Use Personal Information

We may obtain your express consent to the collection of Personal Information, or We may determine that consent has been implied by the circumstances.

Express consent can be verbal or written (including via document signing applications, or email). Where you provide Us personal information as part of obtaining a product through Us, or receiving services from Us, you consent to Us reasonably using that Personal Information to provide such products or services. If you provide personal data to Us about other people, you must have authority to provide such information on their behalf and have obtained their consent where necessary. You must provide this Privacy Policy to them.

You also authorize Us to use and retain 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.

If you do not provide consent, or withdraw your consent, we may not be able to, or may be limited, in the ability to provide you or an authorized third party with the products or services desired. It may mean that you will not be entitled to insurance underwriting, insurance policy issuance, or renewal or claims administration of existing policies.

## Protection of Personal Information

We use a range of organizational and technical security measures in an effort to protect your Personal Information. Those measures include internal protocols and firewalls restricting access, physical servers in secure locations accessible only by authorized personnel, and safety guidelines and

technology to protect data stored within the cloud. However, PRL like all other organizations is subject to data threats and cannot guarantee the security of our systems or that information you send to Us electronically will not be accessed by unauthorized parties while being transmitted to us over the internet.

## Transfers Outside of Quebec

As a company with operations across Canada, Personal Information that We receive may be transferred, maintained and/or processed outside of out of the province or territory in which it was collected, or out of Canada. In accordance with Quebec private sector privacy legislation, we assess Personal Information that is being transferred outside of Quebec to ensure that the information will be adequately protected. To the extent that any personal data is collected, used or stored outside of Canada, it is subject to the laws of the country in which it is held.

## Data Retention Practices

We retain Personal Information for as long as required for the identified purpose, based on our business needs, or as required by law. Personal Information that is no longer required to be retained is destroyed in a safe and secure manner in accordance with our policies. De-identified or aggregated data is not treated as Personal Information and may be used for analytics purposes.

## Changes to Our Privacy Policy

We may modify this Privacy Policy from time to time. Changes to this Privacy Policy become effective when the updated policy is posted on our website. Providing us with Personal Information or using our Services following posted changes to this Privacy Policy indicates your acceptance of the revised privacy policy.

We are committed to respecting your privacy rights. If you wish to exercise any of your privacy rights, or if you have a complaint, question, or concern regarding privacy, please contact us:

### Our Web Site

Use the “Contacts & Locations” section of the web site: [purvesredmond.com](http://purvesredmond.com).

### By Mail

#### Chief Compliance Officer

Purves Redmond Limited  
70 University Avenue, Suite 400  
Toronto, Ontario M5J 2M4

### By Email

[LegalCompliance@purvesredmond.com](mailto:LegalCompliance@purvesredmond.com)

### By Phone

#### Chief Compliance Officer

Purves Redmond Limited  
416.362.4246

### By Fax

#### Attention: Chief Compliance Officer

416.363.7351