



John Beal Insurance Ltd.

PERSONAL INFORMATION PROTECTION POLICY

("Privacy Policy")

Introduction

John Beal Insurance Ltd. recognizes the importance of client privacy and the sensitivity of personal information that we may collect concerning a client. John Beal Insurance Ltd. manages a client's personal information in compliance with Alberta's *Personal Information Protection Act* (PIPA), and will, in certain circumstances, comply with the *Personal Information Protection and Electronic Documents Act* (PIPEDA) as well as all other legislation which John Beal Insurance Ltd. is subject to.

John Beal Insurance Ltd. is committed to safeguarding and protecting the personal information that our clients entrust to us. John Beal Insurance Ltd. strives to protect the privacy and confidentiality of each client's personal information while managing that information in accordance with applicable laws.

This Privacy Policy applies to John Beal Insurance Ltd. and outlines the principles and practices that will be followed with respect to a client's personal information. John Beal Insurance Ltd. will only collect, use or disclose personal information for the purposes as outlined in this Privacy Policy. Clients of John Beal Insurance Ltd. can expect their personal information to be protected pursuant to this Privacy Policy.

Personal Information

Personal information means information about an identifiable individual, this includes, but is not limited to, name, address, telephone number, fax number, email address, age, sex, family status, financial information, ethnicity, employment information, etc. Most information collected by John Beal Insurance Ltd. from a client is considered Personal Information. In the event that there is any dispute over whether information is personal, John Beal Insurance Ltd. will assume such information is personal information.

A client or customer is anyone who contacts John Beal Insurance Ltd. and requests any advice, products or services from John Beal Insurance Ltd.

Collection and Use of Personal Information

John Beal Insurance Ltd. will only collect the necessary information for the purposes of providing services and meeting the needs of clients. The personal information collected shall be used for the following:

- a. Opening and managing a client account;
- b. Allowing John Beal Insurance Ltd.'s employees to contact a client with respect to products or services that relate to a client's account;
- c. Understanding, accessing and assisting a client with ongoing insurance needs;
- d. Assessing risk, eligibility, claims, or investigating a client's claim pursuant to services provided by John Beal Insurance Ltd.;
- e. Delivering insurance products and insurance related products to a client;
- f. Sending or delivering information to a client regarding products or services from John Beal Insurance Ltd. that may be of value to a client;
- g. Contacting a client regarding appointments;
- h. Contacting a client to receive feedback to determine satisfaction with products or services recommend or provided by John Beal Insurance Ltd.;
- i. Contacting a client to obtain information to assess and review insurance products or insurance related products;
- j. Contacting a client to offer alternatives to current products or services provided by John Beal Insurance Ltd. or other insurance providers;
- k. Contacting a client to assess a client's wants, needs or desires for certain products or services offered by John Beal Insurance Ltd.;
- l. To calculate quotes and obtain information from other corporations, persons or entities, who can provide products as requested by a client;
- m. To perform necessary due diligence and contact certain parties to provide products or services from John Beal Insurance Ltd.; and
- n. To meet regulatory, legislative or other legal requirements.

John Beal Insurance Ltd. will collect client information directly from the client; however, we may also collect personal information from other corporations, persons or entities with client consent or as authorized by law. John Beal Insurance Ltd. follows reasonable and prudent business practices to collect, use, and disclose a client's personal information for the purposes as described herein.

As the circumstances so dictate, John Beal Insurance Ltd. will notify a client, before or at the time of collecting their personal information, of the purposes for which the collection of the information will be used. When a client volunteers information for an obvious purpose, such notification may not be given to a client.

John Beal Insurance Ltd. may use and disclose a client's personal information only for the purposes for which the information was collected, unless authorized by law or consent is given by the client. If a client wishes to disclose their personal information for a new purpose other

than that for which the information was originally disclosed, John Beal Insurance Ltd. will seek consent from the client.

Consent

The use of your personal information by John Beal Insurance Ltd. is crucial to meet your insurance needs. Accordingly, John Beal Insurance Ltd. asks for a client's consent to use, collect or disclose personal information, except where collection, use or disclosure of personal information is required or authorized by law. We may assume consent where a client has volunteered information for an obvious purpose. For clarity, an obvious purpose may be a client requesting a quote or inquiring about certain insurance products or insurance related products.

John Beal Insurance Ltd. may ask for a client's expressed consent for some purposes and may not be able to provide certain services or information if a client does not provide consent to collection, use or disclosure of personal information. Where expressed consent is needed, John Beal Insurance Ltd. will seek consent either orally in person, orally by telephone, in writing, or by electronic means.

In order to adequately serve our clients, John Beal Insurance Ltd. may disclose a client's contact information to other organizations that John Beal Insurance Ltd. believes will be of interest to that client. If a client does not wish for their information to be disclosed to other organizations, they must indicate that they wish to opt out of this option with John Beal Insurance Ltd.

A client is free to withdraw consent to the use and disclosure of their personal information at any time, unless the personal information is necessary to fulfill any legal obligations of John Beal Insurance Ltd.

John Beal Insurance Ltd. may collect, use or disclose a client's personal information without consent only as authorized by law.

Safeguard Personal Information

John Beal Insurance Ltd. will make every reasonable effort to ensure that a client's personal information is accurate and complete. A client is obligated to inform John Beal Insurance Ltd. of any change to their personal information which may have an effect on any products or services provided by John Beal Insurance Ltd. or which may affect the relationship between the client and John Beal Insurance Ltd.

Any error of client personal information or change of circumstances for the client must be directed to John Beal Insurance Ltd. immediately.

John Beal Insurance Ltd. will protect a client's personal information in a manner that is appropriate and in accordance with industry standards for the level of sensitivity of the personal information provided by a client. John Beal Insurance Ltd. uses technological safeguards (security software) and passwords to safeguard electronic stored personal information. Hard copies of information are stored in a location secured by physical locking

mechanisms, gates, and an alarm system and, where applicable, in a physically secure off-site storage facility.

John Beal Insurance Ltd. makes every reasonable effort to prevent any loss, misuse, disclosure or modification of a client's personal information, as well as any unauthorized access to personal information. John Beal Insurance Ltd. will notify the Office of the Information and Privacy Commissioner of Alberta, without delay, of a security breach affecting a client's personal information if it creates a real risk of significant harm to the client.

John Beal Insurance Ltd. will retain a client's personal information for as long as it is reasonable to fulfill the purposes for which the information was collected or for such other legal or business purposes. John Beal Insurance Ltd. maintains a records retention and disposition schedule as well as a guideline for deletion and destruction of personal information.

When destruction is appropriate, John Beal Insurance Ltd. destroys personal information once that information is no longer needed or required pursuant to legal or other business purposes. Destruction of personal information includes the shredding of paper records and the permanent deletion of electronic records.

Access to Personal Information

A client of John Beal Insurance Ltd. has a right to access their own personal information in a record that is in our custody or under our control, subject to specific exemptions as indicated by law. Exceptions include but are not limited to:

- (a) the disclosure of the information could reasonably be expected to threaten the life or security of another individual;
- (b) the information would reveal personal information about another individual; and
- (c) the information would reveal the identity of an individual who has in confidence provided an opinion about another individual and the individual providing the opinion does not consent to disclosure of his or her identity.

When John Beal Insurance Ltd. refuses a request in whole or in part, they will provide the reasons for such refusal if the circumstances deem appropriate.

A client may request access to their personal information from the Privacy Officer at John Beal Insurance Ltd. The client must provide sufficient information to allow for the Privacy Officer to identify the information being sought by the client. The client may also request information regarding John Beal Insurance Ltd.'s use of the client's personal information and any disclosure that was made outside of John Beal Insurance Ltd.

Questions

If you have any question, concerns or complaints about the collection, use or disclosure of personal information by John Beal Insurance Ltd., or about a request for access to your own personal information, please contact the Privacy Information Officer at:

Privacy Officer
John Beal Insurance Ltd.
403-285-3200
Info@johnbealinsurance.com
806 – 2220 68th Street NE
Calgary, Alberta
T1Y 6Y7

If you are not satisfied with the response you receive, you should contact the Information and Privacy Commissioner of Alberta at:

Office of the Information and Privacy Commissioner of Alberta
Suite 2460, 801 - 6 Avenue, SW
Calgary, Alberta T2P 3W2
Phone: 403-297-2728 Toll Free: 1-888-878-4044
E-mail: generalinfo@oipc.ab.ca Website: www.oipc.ab.ca