

## GLOBAL AEROSPACE UNDERWRITING MANAGERS (CANADA) LIMITED

# PRIVACY POLICY

Global Aerospace Underwriting Managers (Canada) Limited has always recognized the importance of protecting the privacy of our policyholders. We welcome and support Canada's federal statute, the "Personal Information Protection and Electronic Documents Act" ("PIPEDA").

The following is a summary of the privacy principles found within PIPEDA and how we adhere to the spirit of these principles.

### TYPES OF PERSONAL INFORMATION THAT WE COLLECT:

"Personal information" means information about you as an identifiable individual. It does not mean aggregated anonymous information that we may use for statistical or analytical purposes.

In the course of assessing your application for insurance, we may collect the following types of personal information from you:

• name, address, date of birth, medical history, pilot's license number, endorsements to pilot's license, flying time, accident history, aircraft ownership details, types of flying experience.

### PURPOSE OF COLLECTING PERSONAL INFORMATION:

- To evaluate the risk of providing the policyholder with insurance and to provide a fair price for the appropriate insurance product for each policyholder
- To communicate with the policyholder about their insurance policy and to administer the policy
- To fairly evaluate and settle claims
- To accurately calculate and report reinsurance premium expense / reinsurance claims recoveries in accordance with the terms and conditions of reinsurance agreements
- To detect and prevent fraud
- To meet those requirements as authorized by law

In summary, personal information is collected in the daily course of business so that we can be Canada's aviation insurer of choice.

## **OBTAINING CONSENT:**

Our insurance products are sold exclusively through the independent broker network. As such, when we price an insurance product for a policyholder (or potential policyholder) it is necessary for the independent broker to obtain the personal information from the policyholder (or potential policyholder). By providing the requested information to the broker, you are providing your consent that the information may be used and disclosed as described in this policy. Without your consent to our collection, use and disclosure of your personal information as described in this policy, we will not be able to transact business with you.

In the evaluation and settlement of claims we obtain information from the affected party (policyholder and/or 3<sup>rd</sup> party claimant) either directly from the affected party or indirectly from other 3rd party sources such as: claims adjusters, medical experts, legal counsel, government agencies (e.g. Transportation Safety Board) and witnesses. Without this personal information we will not able to evaluate and settle claims. By providing the requested information to your broker, you also provide your consent to our collection of personal information about you from third party sources for the purposes of evaluation and settlement of claims.

In certain circumstances permitted under PIPEDA, your consent (direct or implied) may not be required for the collection, use or disclosure of your personal information, such as, for example, for the purpose of investigating a breach of an insurance policy or a contravention of Canadian law.

### LIMITING COLLECTION OF PERSONAL INFORMATION:

We limit the collection of personal information for only those business purposes identified above and only in a fair and lawful manner.

### LIMITING USE, DISCLOSURE AND RETENTION:

We do not sell, advertise or market your personal information to third parties. The personal information is retained by the company for as long as necessary for us to be able to transact business and/or as required by law, whichever is later.

### **ACCURACY OF PERSONAL INFORMATION:**

As we obtain the personal information, we review the information with provider of the information (i.e., independent broker, policyholder, 3<sup>rd</sup> party source) to ensure that the information is accurate. As well, we have internal review processes in place to ensure that the information is documented accurately. However we also rely on individuals to disclose all significant information to us and to inform us of any significant changes.

### **DISCLOSURES:**

By providing the requested information to the broker, you agree that we may disclosure your personal information to:

- reinsurance companies
- claims adjusters
- lawyers retained by us
- private investigators retained by us
- medical experts retained by us
- premium finance companies only in those circumstances where the policyholder has applied with the premium finance company to borrow funds in the settlement of the insurance premium
- regulatory and government agencies for the purposes of collecting statistical information

#### **SAFEGUARDS:**

Depending on the sensitivity of the personal information, we employ appropriate physical and electronic security measures. For example:

- Insurance policy file and claims files are physically segregated within the office
- The company's employees access personal information only when they have a business reason to do so and employees have varying levels of authority to access your information
- Electronic safeguards such as "firewalls" and passwords are in place within the company's information technology infrastructure

### **OPENNESS:**

This Privacy Policy is made available to you through our website. Alternatively you can contact our office directly and we will mail you a copy of our Privacy Policy.

### **INDIVIDUAL ACCESS:**

At any time, you may request, in writing and with appropriate identification, that your personal information be made available to you. We will comply with such requests except in those very rare circumstances where to do so would result in a violation of applicable laws.

#### **CONTACT:**

Requests for personal information access or complaints about the company's handling of personal information should be referred to the Company's Chief Operating Officer as follows:

Mr. Gavin McMahon Chief Operating Officer Global Aerospace Underwriting Managers (Canada) Limited 150 Commerce Valley Drive West, Suite 210 Markham, Ontario L3T 7Z3

E-mail: ca-privacy-officer@global-aero.com

Telephone #: 905-479-2244 Fax #: 905-479-0751

### **AMENDMENTS:**

We may amend this policy from time to time. Check our Company website for the latest version, or contact our Chief Operating Officer as noted above.