

PETLINE INSURANCE COMPANY AND AFFILIATES PRIVACY STATEMENT

This privacy statement (the “**Statement**”) describes the practices of Petline Insurance Company and its affiliates (collectively “**we**”, “**us**”, “**our**”) with respect to our collection, use, storage and disclosure of the personal information provided to us by our customers and members of the public.

All references to “**Website**” in this Statement refer to the website which this Statement is a part of.

1. Introduction

We respect and uphold individual rights to privacy and the protection of personal information. We know how important it is to protect your personal information and strive to make every customer experience safe and secure. In keeping with that goal, we have developed this Statement to explain our practices for the collection, use, and disclosure of your personal information.

For the purposes of this Statement, “**personal information**” means information about an identifiable individual, including, for example, an individual’s name, home address, telephone number, social insurance number, sex, income and family status. Personal information does not include information that would enable an individual to be contacted at a place of business, for example, an employee’s name, position or title, business telephone number, or business address. We will only collect, use or disclose personal information in accordance with this Statement, or in accordance with laws applicable to the collection, use and disclosure of your personal information by us (“**Applicable Privacy Laws**”).

We have appointed a Chief Privacy Officer for each of our business units who is responsible for our compliance with this Statement. Information on how to contact the applicable Chief Privacy Officer can be found below.

2. Collection and Use of Personal Information of Customers

If you are a customer of ours, we collect two types of information from you: personal information and non-personal information. The types of information we collect depend on the nature of your interaction with us.

(a) Customer personal information

The customer personal information that we collect from you, and may collect from third parties about you (provided that such collection is permitted under Applicable Privacy Laws) falls into the following categories:

- your contact information – for example, name and email address;
- your personal preferences – for example, language preferences, and marketing consent;

- your financial information – for example, your occupation, your income, assets, liabilities and mortgage and credit card information; and
- your eligibility assessment information – for example, your medical and health information, financial information, driver’s license number, accident/violation history, your claims history, marital status, and occupation.

(b) Customer non-personal information

We also collect non-personal information about our customers (i.e. which does not identify you as an individual). For example:

- we may collect certain non-personal data when you visit our Website, such as the type of browser you are using or the referring URL; or
- we may collect and summarize customer information in a non-personal, aggregate format for statistical and research purposes. We may, for example, summarize our data to determine that a certain percentage of users are male, aged 18 to 25.

You may choose not to provide us with your personal information. However, if you make this choice we may not be able to provide you with the service or information that you requested. For example, we require your eligibility assessment information in order to determine what products and services we can provide to you, and at what cost, and we require your address in order to send you information that you have requested or correspondence related to the products and services we provide to you.

3. Non-Customer Personal Information

If you are not a customer of ours, we still collect two types of information from you, although the collection is more limited. The types of information we collect depends on the nature of your interaction with us.

(a) Non-customer personal information

The non-customer personal information that we collect from you, and may collect from third parties about you (provided that such collection is permitted under Applicable Privacy Laws) falls into the following categories:

- your contact information – for example, name and email address; and
- your personal preferences – for example, language preferences and marketing consent.

We also collect non-customer non-personal information (which does not identify you as an individual). For example:

- we may collect certain non-personal data when you visit our Website, such as the type of browser you are using or the referring URL; or

- we may collect and summarize customer information in a non-personal, aggregate format for statistical and research purposes. We may, for example, summarize our data to determine that a certain percentage of users are male, aged 18 to 25.

You may choose not to provide us with your personal information. However, if you make this choice we may not be able to provide you with the service, or information that you requested. For example, we require your address in order to send you information on products and services that you request from us.

4. Use of Personal Information

We may use your personal information for a number of different business purposes. For example, we use it to:

- properly understand your business needs;
- recommend relevant products and services we offer to you;
- assess your eligibility for and the costs of providing our products and services to you;
- meet our legal and regulatory obligations;
- meet our obligations to our third party partners within the insurance and financial services industries;
- fulfill your specific requests for services or information;
- provide customer support to assist you with your questions or complaints;
- promote our services to you and to add it to customer lists we prepare and use for this purpose;
- conduct internal or third party surveys in order to improve our services;
- advise you of changes to our services, or new services that we may implement from time to time;
- measure and improve the effectiveness of our Website or our marketing endeavours;
- detect and protect against fraud and error;
- track and analyze your preferences to better understand your service needs and eligibility; and
- for other purposes as described in this Statement.

We limit the personal information we collect and use to that which is necessary to fulfill the requested purpose. We will not collect, sell, distribute or use personal information for any other

purposes without your further consent, as required by law or as authorized by Applicable Privacy Laws.

5. Your Consent

We will collect, use, or disclose your personal information only with your knowledge and consent, except where required or permitted by Applicable Privacy Laws. When you choose to provide us with your personal information, you consent to the use of your personal information as identified in this Statement and as may be further identified at the time of collection.

(a) Express Consent

Sometimes you will be asked to give your express consent to the collection, use or disclosure of personal information by us – for example, by being asked to check a box to indicate your consent to receive marketing communications or to the sharing of your personal information with our third party partners in the financial services or insurance industries.

(b) Implied Consent

Other times, you may provide your implied consent to the collection, use or disclosure of personal information by us when we can reasonably conclude that you have given consent by some action you have taken or an action you have decided not to take. Generally, this occurs where the purpose for the use of your personal information would be reasonably apparent to you – for example, when you provide us with your mailing address as part of your request for us to send you information on our products and services.

(c) Withdrawing Your Consent

You may withdraw your consent to the collection, use or disclosure of your information at any time, subject to legal or contractual restrictions and reasonable notice. However, without your consent we may not be able to continue to provide you with the products or services you requested.

If you have "opted in" or subscribed to one of our mailing lists, we will always provide you the opportunity to "opt out" or unsubscribe. For example, if you receive these emails from us, we will provide a link in the email that you can use to unsubscribe from that mailing list.

6. Information We may Collect Directly from You

Listed here are some further examples of the ways that we collect personal information directly from you and how we use it.

(a) Customer Service Representatives and Agents

Our customer service representatives and agents will collect personal information from you in order to assess your needs and eligibility for the products and services we offer, and in order to fulfill your requests for those products and services if you choose to purchase them from us. By providing information to us about additional household members and employees of your business, you are confirming that those persons have consented to the collection, use and

disclosure of their personal information for the purposes of processing your application, policy administration and payment of claims.

(b) Follow-Up and Surveys

From time to time, we may send you a follow-up letter to thank you for your use of the Website, or we may contact you to ensure that you are completely satisfied.

We may use contact information collected online to conduct occasional surveys and other customer research. We may also disclose this information to third party market research companies or other third parties for purposes of maintaining and improving upon products and services provided to you. These surveys are entirely voluntary and you may easily decline to participate.

(c) Our Website

Our Website can be browsed anonymously. However, to engage in certain special features or functions of our Website, you may be asked to provide certain personal information, such as your name or email address. We use this information to respond to your inquiries.

(d) Sign-Up for Newsletters or Updates

We may also offer email newsletters. Should you choose to receive those updates, we will collect your contact information, such as name and email address. This information will only be used to send you the updates that you have requested. You may “unsubscribe” at any time by following the unsubscribe directions located in the footer of each email, or using another method that we describe in the updates. Our subscriber list is never given, sold or licensed to third parties.

(e) Participate in a Contest or Promotion

From time to time, we may run contests or promotions. If you participate, you may be asked for contact information as well as additional optional survey information (for example, product preferences). Personal information from contest entries will be used only to administer the contest and contact you if you win. For research and analysis purposes, we may also summarize contest survey information in a manner that no longer identifies individual participants. All contests and promotions are handled in accordance with this Statement, as are the rules that will be available with each particular campaign. Some contests may be conducted by third parties and will be subject to the third party’s policies.

(f) Customer Support/Service Centre

We operate a customer support centre to accept and address your questions, concerns, or complaints. When you contact our customer support centre, we may ask for personal information to help us respond to your inquiry or to verify your identity. For example, if you need to make a change to your account, we will ask for personal information to verify that you are the account holder. We may also monitor or record your online or telephone discussions

with our customer support representatives for training purposes and to ensure service quality and accuracy.

7. Information We Collect Automatically

In some cases, we automatically collect certain information from individuals who visit our Website.

(a) Our Website

When using our Website, we may collect the Internet Protocol (IP) address of your computer, the IP address of your Internet Service Provider, the date and time you access our Website, the Internet address of the Website from which you linked directly to our Website, the operating system you are using, the sections of the Website you visit, the Website pages read and images viewed, and the content you download from the Website. This information is not personal information. It is used for Website and system administration purposes and to improve the Website's functionality.

(b) Cookies

The Website uses "cookies," a technology that installs a small amount of information on a Website user's computer to permit the Website to recognize future visits using that computer. Cookies enhance the convenience and use of the Website. For example, the information provided through cookies is used to recognize you as a previous user of the Website, to offer personalized Web page content and information for your use, to track your activity at the Website, to respond to your needs, and to otherwise facilitate your Website experience. You may choose to decline cookies if your browser permits, but doing so may affect your use of the Website and your ability to access certain features of the Website or engage in transactions through the Website.

(c) Website Tracking Information

We may use web beacons or pixel tags to compile tracking information reports regarding Website user demographics, Website traffic patterns, and Website purchases. We may then provide these reports to advertisers and others. None of the tracking information in these reports can be connected to the identities or other personal information of individual users. For our own research purposes we may link tracking information with personal information voluntarily provided by Website users. Once such a link is made, all of the linked information is treated as personal information and will be used and disclosed only in accordance with this Statement.

(d) Links to Other websites

Our Website may contain links to other websites or Internet resources which are provided solely for your convenience and information. When you click on one of those links you are contacting another website or Internet resource. We have no responsibility or liability for, or control over, those other websites or Internet resources or their collection, use and disclosure of your personal information. We encourage you to read the privacy policies of those other websites to learn how they collect and use your personal information.

8. Supplementing Information

From time to time we may supplement information you give us with information from other sources, such as information validating your address or other available information you have provided us. This is to help us maintain the accuracy of the information we collect and to help us provide better products and services to you.

9. Disclosure and Sharing of Your Information

We do not sell or license your personal information to any other party. However, in the normal course of business we will share some of your personal information with third parties. We require our third party partners to comply with the same Applicable Privacy Laws which govern the collection, use and disclosure of your personal information as we are required to comply with.

(a) Service Providers

From time to time we will share some of your personal information with our third party partners in the financial services and insurance industries in order to meet our obligations to them, and also to determine your eligibility for, and the cost of, the products and services you have asked us to provide to you. When we do use an outside company, we use contractual or other appropriate means to ensure that your personal information is used in a manner that is consistent with this Statement and with Applicable Privacy Laws.

We ensure that all of our service providers meet our privacy standards before we enter into contracts with them. We also require them to secure and maintain confidentiality with respect to Personal Information. We only provide the personal information that is required to perform the services requested by us.

Collecting and Transferring your Personal Information to Service Providers Outside Canada

Our business requires that we sometimes contract with service providers outside of Canada to carry out certain functions on our behalf such as data processing and back-up. In such situations, we enter into contracts with our service providers and they cannot disclose your Personal Information except where authorized to do so by law or by Petline.

For certainty, some of these operations may result in personal information collected by us being stored or processed in the United States or other jurisdictions, and as a result, your personal information may be accessible to law enforcement and regulatory authorities in accordance with the USA PATRIOT Act and other applicable laws of the United States or other applicable jurisdictions, unless the collection, use, disclosure or storage of information outside of Canada is otherwise prohibited by law, in which case your personal information will remain inside Canada.

In addition, our third party partners within the insurance and financial services industries may also rely on data processing and other services provided by service providers located outside of Canada. As a result, it is possible that some of our partners within the insurance and financial services industries may share your Personal Information, on a confidential basis, with a foreign service provider (unless otherwise prohibited by law).

(b) Third Party Market Research Companies and other Third Parties

We may also share your personal contact information with third party market research companies and other third parties for purposes of maintaining and improving upon the products and services we provide to you. When we do use an outside market research or survey company, we use contractual or other appropriate means to ensure that your personal information is used in a manner that is consistent with this Statement and with Applicable Privacy Laws.

Your participation in any market research or survey is entirely voluntary and you may easily decline to participate. Further, you may withdraw your consent to the collection, use or disclosure of your personal information to third party market research companies and other third parties at any time upon reasonable notice to Petline, and you will not be refused any products or services as a result of your decision not to participate or the withdrawal of your consent hereunder.

(c) Information Shared Amongst Our Affiliates, Subsidiaries and Divisions

We may share personal information gathered on our Website with and amongst our corporate subsidiaries, affiliates or divisions for internal business purposes in accordance with this Statement. If we do, we will ensure that your information continues to be used only in accordance with this Statement and your expressed choices.

(d) Legal Disclosure

We may disclose your information as permitted or required by law. For example, we may be compelled to release information by a court of law or other person or entity with jurisdiction to compel production of such information. If we have reasonable grounds to believe information could be useful in the investigation of improper or unlawful activity, we may disclose information to law enforcement agencies or other appropriate investigative bodies.

10. Security of Personal Information

The security of your personal information is a high priority for us. We maintain appropriate safeguards and current security standards to protect your personal information, whether recorded on paper or captured electronically, against unauthorized access, disclosure, or misuse. For example, electronic records are stored in secure, limited-access servers; we employ technological tools like firewalls and passwords; and we ensure our employees are trained on the importance of maintaining the security and confidentiality of personal information. Reasonably secure methods are also used whenever we destroy personal information.

However, although we have physical, electronic and procedural safeguards that we believe are adequate to protect personal information that is captured electronically and stored online, any such systems may be subject to human and operational error. In particular, because the internet is an open system, we cannot and do not guarantee that personal information entered by you online will not be misappropriated, intercepted, modified, deleted or used by others.

11. Requests for Access to and Correction of Personal Information

Applicable Privacy Laws allow any individual the right to access and/or request the correction of errors or omissions in his or her personal information that is in our custody or under our control. Our Chief Privacy Officer will assist the individual with the access request. Our Chief Privacy Officer's assistance may include:

- (a) identifying personal information under our custody or control;
- (b) providing information about how personal information under our control may be or has been used by us; and
- (c) listing the names of any individuals and organizations to which the individual's personal information has been disclosed.

We will respond to written requests within the time allowed by Applicable Privacy Laws and will make every effort to respond as accurately and completely as possible. Any corrections made to personal information will be promptly sent to any organization it was disclosed to. There is no charge for verifying or correcting personal information. There may be a limited charge if you want a copy of your records.

In certain exceptional circumstances, we may not be able to provide access to certain personal information it holds about an individual. If access cannot be provided, we will notify the individual making the request within 30 days, in writing, of the reasons for the refusal.

12. Removal of Your Information

We keep your information only as long as we need it for legitimate business purposes and to meet any legal requirements. Personal information used to make a decision that directly affects an individual will be kept for at least one year after the said decision is made. We have retention standards that meet these parameters. We either destroy your information when it is no longer needed or required to be kept, or we remove your personally identifiable information to render it anonymous.

13. Concerns or Questions regarding our Compliance

Questions or concerns regarding our compliance with this Statement may be directed to the Chief Privacy Officer:

Petline Insurance Company
Privacy Officer
111 Westmount Road South
P.O. Box 2000
Waterloo, Ontario N2J 4S4

Petline Insurance Company
300-600 Empress Street
Winnipeg, Manitoba
R3G 0R5
privacy@petlineinsurance.com.
Toll Free: 1-800-431-3132
Fax: 1-866-322-5246

We will investigate all complaints and take all appropriate steps to rectify the situation. However if you are not satisfied with our Chief Privacy Officer's response to your question or concern, you may be able to make a complaint under Applicable Privacy Laws. Our Chief Privacy Officer can provide you with the contact information to make such a complaint.

14. Summary of Our Ten Privacy Principles

Principle 1 – Accountability: We are responsible for all personal information under our control and our Chief Privacy Officer is accountable for our compliance with the principles described in this Statement.

Principle 2 – Identifying Purposes: We will identify and document the purpose for which personal information is collected at or before the time the information is collected.

Principle 3 – Consent: We will obtain your knowledge and consent (express or implied) for the collection, use or disclosure of personal information, except as otherwise required or permitted by law.

Principle 4 – Limits to the Collection of Personal Information: We will limit the amount and type of personal information collected to that which is appropriate and required for its purposes.

Principle 5 – Limiting Use, Disclosure and Retention of Personal Information: We will not use or disclose personal information for purposes other than those for which it was collected, except with your consent or as required or permitted by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes, except as otherwise permitted or required by law.

Principle 6 – Accuracy: We will keep personal information as accurate, complete, and up-to-date as necessary for its purposes.

Principle 7 – Safety and Security: We will protect personal information with safeguards appropriate to the sensitivity of the information.

Principle 8 – Openness: We will be open about our policies and procedures regarding the collection, use, disclosure and safeguarding of personal information. We will ensure that you are reasonably able to acquire information about our policies and procedures and will make this information available in a form that is generally understandable.

Principle 9 – Individual Access: Upon request in writing, we will inform you of the existence, use, and disclosure of your personal information and will provide access to that information, except where the law requires or permits us to deny access.

Principle 10 – Handling Inquiries and Challenges: We welcome questions about this Statement and our privacy practices, and will direct any complaint concerning compliance with the above principles to our Chief Privacy Officer.

Please be aware that we may update and modify this privacy statement at any time. Please review this section each time you access and/or use our websites.