

# Privacy

For information on our commitment to protecting your privacy, please review our privacy practices below:

## What is privacy?

In broad terms, privacy refers to your right to have control over your personal information. This means you decide what information about you is collected, how it's used, and who gets to see it.

Personal information includes, but is not limited to, the following:

- name, address and telephone number
- age, gender, family, and marital status
- identification numbers (such as social insurance number or driver's license)
- financial and employment information
- credit rating, payment records
- previous insurance and claims experience
- medical and health information

Personal information does not include the name, title, business address or business telephone number of an employee of an organization ("business card information") and any data that we have collected in which all the "personal identifiers" have been removed, making it impossible to determine the identity of the person to whom it relates.

## Our commitment to you

At Equitable, our commitment to protecting the confidentiality and security of our clients' personal information has, and always will be, an integral part of our corporate values. Equitable has adopted the 10 privacy principles established by the Canadian Standards Association's Model Code for the Protection of Personal Information. These 10 principles form part of the Personal Information Protection and Electronic Documents Act ("Act"). This Act establishes rules governing the collection, use and disclosure of personal information.

Our privacy commitment is about more than complying with applicable privacy laws. It's about doing the right thing for the people whose lives we touch every day.

## How we protect your information

We use technical, physical and organizational safeguards to protect your personal information from loss and misuse. We limit access to those who have a business need to know.

We conduct Privacy Impact Assessments (“PIAs”) for new business initiatives and any significant changes to processes that include personal information. The PIA is a risk management practice that helps us assess how your privacy is being protected when it is collected, used, stored or shared.

## Why we ask for your personal information

We collect your personal information when you apply for an Equitable product or service. This includes insurance, investment and group benefits products. We do this to set up and service your needs as a client. The personal information we ask for depends on the product or service you’re requesting.

When needed, we may share your personal information with:

- People involved in the sales process, including your advisor or broker
- Plan sponsors or administrators
- Reinsurers and other insurance companies
- Insurance reporting agencies
- Credit bureaus
- Third party service providers retained by Equitable
- Healthcare professionals
- Canadian and foreign tax authorities and other governmental bodies
- Any other authorized person, corporation or enterprise

Here are some examples of how we use the information you share with us to better support you:

### Birth date

By providing us with your birth date we can better identify you and ensure that no one is trying to impersonate you. We may also use your birth date to determine your eligibility for products and/or services you’re requesting.

### Social insurance number

Your social insurance number (SIN) is required for certain benefits and products that earn investment income to comply with Canada Revenue Agency's income reporting requirements. If you provide your SIN, we may also use it to keep your information separate from other clients.

## Health and financial information

Your health and financial information help us assess your eligibility for certain products and services.

## Biometric information

A biometric is the measurement and analysis of a person's unique physical or behavioural characteristics such as a voiceprint, fingerprint or facial features used for identification or authentication. When utilized, biometrics are used to protect your information. They help to prevent fraudulent or unauthorized access to your accounts and provide better protection compared to security questions alone. We will collect your biometric information only with your consent and use it only for authentication purposes.

## Our 10 privacy principles

- 1. Accountability:** All employees of Equitable are accountable for protecting the confidentiality and security of all personal information under their control. We've designated an individual to oversee our compliance with the Act and ensure that our 10 privacy principles are upheld.
- 2. Identifying purposes:** We'll identify the purposes for which your personal information is being collected either before or at the time of collection. With your permission, your personal information may be collected, used and disclosed by Equitable for the following purposes:
  - confirming your application information and assessing your eligibility for products and services;
  - providing you with ongoing services, establishing and maintaining communication with you and responding to any inquiries you may have;
  - assessing the suitability of Equitable's products or services for you or providing you with information on other Equitable products and services that may help meet your financial security needs;
  - processing and adjudicating your claims and determining your eligibility for benefits;
  - notifying you about Equitable events and activities; and
  - meeting legal and regulatory requirements.
- 3. Consent:** We'll explain the reason for and obtain your consent before using your personal information for any purpose other than those listed above. We'll only collect, use and disclose your personal information with your consent, except where otherwise required or permitted by law. Your medical and health information will only be shared with your consent. Equitable does not sell, trade or rent its clients' personal information to any organization for any purpose.

It's your right to choose not to provide us with some or all of your personal information. You may even

deny or withdraw consent to the use or disclosure of your personal information for certain purposes. However, it's important to remember that we require certain aspects of your personal information to establish your eligibility for certain products and services, or to continue to provide you with these products and services.

4. **Limiting collection:** We'll limit the collection of your personal information to only those details that are necessary for the purposes identified.
5. **Limiting use, disclosure, and retention:** We'll only use your personal information for the purposes for which it was collected, unless you have consented otherwise, or when it is required or permitted by law. Your personal information will only be retained for the time necessary to fulfill the purposes for which it was collected, and to meet any legal or regulatory requirements.
6. **Accuracy:** We'll keep your personal information as accurate, complete and up-to-date as possible to fulfill the purposes for which it was collected. You can assist us in ensuring your records are current by providing us with any changes to your personal information, such as an address change. You have the right to challenge the accuracy and completeness of your personal information and amend it, as necessary.
7. **Safeguards:** We'll protect the personal information we collect from you with security safeguards. Our systems and procedures are designed to prevent loss, misuse, unauthorized access, disclosure, alteration or destruction of your personal information. Only authorized employees and service providers of Equitable have access to your personal information.  
Our commitment to security extends to the contracts and agreements that we sign with external suppliers and service providers.
8. **Openness:** We'll make available to you information about our policies and practices relating to the management of personal information.
9. **Access:** We'll give you access to your personal information at your request, subject to any legal or business restrictions. There may be a nominal charge for doing so.
10. **Challenging compliance:** You may contact us with any questions, concerns, or suggestions with respect to our ten privacy principles at the address below.

## Other information you should know

We work with other companies to deliver services to you. These third parties may be located outside of Canada. As a result, your personal information may be stored outside of Canada and your information may be subject to the laws of those jurisdictions. If your policy is issued in Quebec, your personal information is stored outside of Quebec.

Please be aware that unencrypted, electronically transmitted information is not secure. Therefore, we can't guarantee the security of any information you transmit to us electronically or that you request us to transmit to you via public internet.

We don't knowingly collect information from or market products and services directly to children under the legal age for purchasing insurance. We only collect information about children from parents or legal guardians when they are covered under their policies or assigned as beneficiaries.

If you have a privacy related complaint, please visit the [Complaint Process](#) page on our website or contact us using the information provided below. We respond to privacy-related complaints in accordance with the complaint handling process. The Privacy Office will work with our business unit teams to help ensure your privacy concerns are appropriately addressed.

Chief Privacy Officer  
One Westmount Road North  
P.O. Box 1603 Station Waterloo  
Waterloo, ON N2J 4C7

Telephone: 1-800-265-8878  
Facsimile: 519-883-7425  
Email: [privacyofficer@equitable.ca](mailto:privacyofficer@equitable.ca)

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This privacy statement is governed by applicable provincial and federal laws and applies to all clients who are Canadian residents. Our privacy policy applies to all Equitable clients who are Canadian residents. We can review and change it from time to time. Changes will be posted on our website.