



Privacy (Personal Information Protection) & Compliance Policy

MHK Insurance (MHK) is committed to protecting the privacy of the personal information of our clients, which includes insureds, former insureds, applicants, claimants, and other individuals involved in a claim, as well as its employees.

Effective January 1, 2004, all private-sector organizations in Alberta were subject to the provincial Personal Information Protection Act (PIPA), which was determined to be substantially similar to the federal Personal Information Protection and Electronic Documents Act (PIPEDA) as well as the Digital Privacy Act's amendments to PIPEDA. This legislation sets out the rights of the consumer and duties of Alberta businesses to protect personal information. It establishes in law a number of privacy practices that we comply with at MHK. *Our pledge is to safeguard our clients' and employees' privacy rights as defined by PIPA within Alberta (as well as PIPEDA when personal information crosses provincial borders), as well as all other relevant laws.*

OUR PRIVACY PRINCIPLES

1. Accountability

MHK has a designated individual who acts as Privacy & Compliance Officer and reports to our Chief Operating Officer and/or President and Chief Executive Officer. This individual is collectively accountable for ensuring we use personal information appropriately at all times, which includes how to access personal information, make changes to personal information, register complaints, and address any concerns clients or employees may have about their personal information. All employees of MHK are made aware of who the Privacy & Compliance Officer is and can provide clients or fellow employees contact details if required.

2. Identifying Purposes

MHK will identify the purposes for collecting personal information at or before the time the information is collected.

3. Consent

MHK will only collect, use or disclose our clients' and employees' personal information with their knowledge and consent as accorded by law.

4. Limiting Collection

MHK will only collect personal information that is necessary for the purposes we have identified.



5. Limiting Use, Disclosure and Retention

MHK will not use or disclose personal information for purposes other than those for which it was collected, except with consent or as required by law.

6. Accuracy of Information

Personal information will be as accurate, complete and up to date as is necessary for the purposes for which it is to be used.

7. Safeguards

MHK's clients' and employees' personal information will be protected by security safeguards appropriate to the sensitivity of that information. In other words, the more sensitive the personal information, the greater the security we will provide for it.

8. Openness

MHK will make readily available to individuals specific information about our policies and practices as they relate to the way we manage personal information entrusted to us.

9. Individual Access

Upon request, an individual will be informed of the existence, use and disclosure of their personal information, and will be given access to that information. An individual can challenge the accuracy and completeness of the information and have it amended as appropriate.

10. Challenging Compliance

An individual can address a challenge concerning compliance with the above principles to our Privacy & Compliance Officer who is accountable for MHK's compliance with the principles.



USING & DISCLOSING PERSONAL INFORMATION

MHK has developed a number of policies and procedures related to the way we handle our clients' and employees' personal information. These support the legislation as it specifically applies to our business, including:

- a) We collect, use and disclose our clients' personal information in order to provide them with the insurance protection or surety that they have requested. In order to do this, we use our clients' personal information for the purposes of:
 - Establishing and maintaining communications with them
 - Arranging their insurance or surety with one or more insurance companies
 - Offering and providing products and services to meet their needs
 - Acting as required or authorized by law
- b) MHK only collects personal information that we require to provide our clients with the insurance protection or surety that they have requested. The type of personal information that we hold depends upon the type of insurance/surety our clients purchase or wish to purchase, including but not limited to:
 - Full name
 - Address
 - Phone numbers (home, work, mobile)
 - Date of birth
 - Family status
 - Marital status
 - Occupation
 - Medical and health records
 - Financial statements
 - Indemnity agreements
 - Assets
 - Liabilities
 - Income
 - Credit rating
 - Whether or not credit was extended or refused
 - Credit and payment records
 - Previous insurance experience including loss/claims history
 - Driving records

MHK will only use this information for the purposes for which it was initially collected. For example, personal information collected in an application for automobile insurance cannot be



used or disclosed by us to an insurance company to whom our client is applying for home insurance unless/until the client makes a request for other types of insurance.

When our clients provide us with their personal information, we consider that they do so with the knowledge and understanding that it is collected, used and disclosed for the Identified Purposes. Given the nature of the general insurance and surety industry, client consent may be implied in some circumstances. For example, we sometimes provide insurance or amendments to existing policies over the phone, on short notice, or with little written documentation. In these circumstances, it is impossible to obtain express written consent from our clients. Consent can also be given by a client on behalf of another individual. For example, when an individual applies for automobile insurance for themselves and their family, the applicant is considered to be giving consent for the collection, use and disclosure of personal information both for themselves and their family members even though their family members are not present during the application process. By dealing with MHK on insurance-related matters, MHK infers that we have their consent for the collection, use and disclosure of personal information necessary for the purposes we have identified to our clients. Clients may withdraw their consent subject to legal or contractual obligations and on reasonable notice; however, withdrawal of consent may limit our ability to provide clients with the requested product or service. If a client wants to withdraw consent, they should first contact our Privacy & Compliance Officer who will advise him/her of any implications that this will have.

Protecting Privacy for Clients and Employees

Our clients' and employees' personal information is kept in strict confidence. MHK maintains physical, electronic and procedural safeguards to protect this information from unauthorized access. MHK reviews its policies and practices, monitors its computer networks, tests the strength of its building and digital security, and monitors its compliance with relevant laws in order to help us ensure the safety of our clients' and employees' personal information. MHK restricts access to any personal information to those employees whom we have determined need to know that information to provide our products and services to our clients, and to provide employment to our employees. In addition, all our employees are bound by a Confidentiality Agreement. Personal information is retained only as long as it is needed, or to meet any legal, regulatory or tax requirements.

There are situations specific to the general insurance industry where we will disclose personal information as dictated by prudent insurance practices. Examples of this include:

1. We may transfer our clients' personal information to insurance/surety companies or rating companies that will use that information to determine their eligibility for insurance, the rate or premium to charge, etc.



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2. We may disclose our clients' personal information to businesses that provide goods and services to insurance companies and their customers, such as claims adjusters, appraisers, repair shops, etc.

Only the information necessary for these services will be provided by us to these service providers, and it is done on the basis that they will maintain the confidentiality of the information.

We do not make any personal information available to affiliated organizations such as subsidiaries without our clients' consent.

Clients Accessing their Personal Information

Our clients have a right to submit a written request to access their personal information that is in our possession and make corrections to it. Such a request is to be made to our Privacy Officer at the address listed below. MHK will respond to the request within 30 days. If we are unable to respond within this time period, we will advise the client that additional time is required to prepare our response.

There may be situations in which we are legally prohibited from allowing our clients access to their personal information. For example, we would be so prohibited if allowing them access to their personal information would likely reveal personal information about another person or other confidential information. If this is the case, we will advise the client why, subject to any legal restrictions.

MHK has the right to make a charge for providing clients with access to their personal information. However, we will only do so after first advising them of the approximate cost. MHK will amend personal information for a client that is demonstrated to be inaccurate or incomplete.

Further Information and Contact Details

MHK has made a commitment to respect the privacy rights of clients and employees by ensuring that their personal information is collected, used and disclosed in such a manner that a reasonable person would consider appropriate in the course of doing business or through employment with MHK.

Clients trust us with their personal information and our commitment to them is to protect the information shared with us. Each MHK employee is informed through training and communication on how to treat clients' personal information carefully and with respect.



The information we collect may be used to provide an insurance quote, to assess insurance needs, to purchase a policy, to revise a policy, to ensure client information is accurate and up to date, to settle claims, or to compile statistics. There may be times when MHK may use client information to advise clients of complimentary products and services. **However, at no time does MHK sell our client information as this fundamentally goes against MHK's business philosophy and practices of caring for our clients.**

We believe by requesting a quote or purchasing insurance products through MHK, our clients have given their implied consent to us to collect, use or disclose their personal information, including information that was previously collected before the introduction of PIPA/PIPEDA. At any time and in writing, a client may withdraw their consent, but in doing so may prevent MHK from providing the requested service or product.

We will protect our clients' and employees' personal information by security safeguards appropriate to the sensitivity of the information. Safeguards will vary depending on the sensitivity, format, location and storage of this information.

If you have any concerns or questions about our privacy policies or procedures, please do not hesitate to communicate with our Privacy & Compliance Officer in writing at one of the following office locations:

Alanna Rast, CIP, CAIB
Privacy & Compliance Officer
MHK Insurance

Edmonton

12316 - 107 Avenue, Edmonton, Alberta T5M 1Z1
T 780.454.9363 TF 1.877.454.9363 E edmonton@mhkinsurance.com

Calgary

200, 239 Midpark Way SE, Calgary, AB T2X 1M2
T 403.255.3050 TF 1.866.249.7940 E calgary@mhkinsurance.com