

Privacy Guidelines

At Canada Life, we are committed to protecting your personal information and respecting your privacy. We'll always be clear about how and when we collect, use and disclose your personal information. Our Privacy Guidelines explain how we do this and let you know about your rights when it comes to your personal information.

Personal information is information that either on its own or combined with other information allows you to be identified. Examples include your name and address, as well as more sensitive information such as your health and financial records.

On this page, we'll refer to ourselves – The Canada Life Assurance Company and our Canadian subsidiaries – as "we", "our" and "us".

These privacy guidelines, as well as our other public policies and procedures, are always available to you. These guidelines may be changed or updated from time to time, and those changes will be reflected on our website and are available for download. Please check back often to stay up to date with any changes we've made.

Find out more about:

- How we collect and protect your personal information
- How we use your personal information
- How we share your personal information
- How to manage your rights when it comes to your information

How we collect and protect your personal information

We collect your personal information from applications and other forms filled out by yourself, or by someone you've authorized. We may collect this information through paper or electronic applications and forms throughout our relationship with you.

We may also collect your information from others, such as your plan sponsor, advisor, healthcare providers, clinics, other insurance companies and the Medical Information Bureau (MIB).

We'll only collect the information we really need

Before we collect your personal information, we'll tell you why we need it. We'll only collect it where necessary and for the purposes identified.

We'll create secure and confidential records containing your personal information, including financial or health information.

When applicable, this will include information about your spouse or dependents and any named beneficiaries provided to us. We'll ask you to confirm their consent for us to collect and use this information, and to communicate with you about them.

We'll only keep your information for as long as we need it, or for as long as is required by our policies and applicable laws. Where appropriate, we may de-identify your personal information to protect it and to minimize the amount of information we retain.

Types of personal information we collect about you

Depending on the product or service, we may collect the following types of personal information. These are just some examples:

- Identification – name, address, telephone number, email address, date of birth, or driver's license.
- Financial – your job and where you work, annual income, assets, liabilities, banking information.
- Health or lifestyle – travel history or plans, driving record, or criminal record.
- Medical – healthcare provider, medical history for you or your family.

Some of the information we collect may contain sensitive health and financial information about you.

Protecting your personal information

We limit access to your personal information to:

- Canada Life staff
- Other authorized individuals who need access to your information to do their job
- People who have your permission

In some cases, we're required to disclose your information to public authorities or others authorized under applicable law in Canada or elsewhere.

All our employees receive annual information security, privacy, and code of conduct training.

We have security standards to protect our systems against unauthorized access and use.

How our service providers protect your personal information

Service providers can only collect, use or disclose your personal information for purposes we allow.

We make sure our service providers act in a way that's consistent with our privacy guidelines and applicable laws.

Our service providers are required to protect their systems against unauthorized access and apply security standards that match or exceed our own high standards.

Accountability for protecting your personal information

We take protecting your personal information seriously. We have technical and organizational safeguards to protect your personal information against loss and unauthorized access, use or disclosure.

Everyone who works at Canada Life, as well as people and companies that act on our behalf, are responsible for protecting your personal information.

Our Privacy Officer monitors compliance with these privacy guidelines.

How we use your personal information

Unless you have agreed, we won't use or disclose your personal information to anyone else unless it's for the purpose for which it was collected. There are exceptions, including:

- If we have to protect our interests in court or a situation involving criminal activity, fraud, or misrepresentation.
- If the law allows or requires us to provide your information to law enforcement, and/or other authorities inside and outside of Canada.

Personal information may be used to:

- Verify your identity and see if you're eligible for products, services, or coverage.
- Administer your products or coverage, including paying claims, processing transactions, and informing you about features or benefits of your products and services
- Help us analyze and optimize our customer service
- Improve your experience by providing you with relevant information and offers

To opt out of having your personal information used to send you relevant information or offers, you can update your preferences in your online profile or send us an email.

No matter what you choose, you'll continue to receive information about the products and services you already have with us. You may also see information and offers about other products on our

website. If you're part of a workplace benefits plan, the method of delivery of documents and the receipt of information and offers may be driven by your plan.

Using your personal information for data analysis

We may use your personal information to help us make decisions related to products and service. To do this, we may use data and analytics tools such as artificial intelligence (AI) and automated processing.

When we use your personal information for these purposes, we'll try to de-identify it wherever possible, and have other processes in place to protect your privacy. Our goal is to handle your personal information in a respectful manner and to use the findings of any analytics to provide you with better products and services.

To learn more about how we use your information in automated processes, email our Privacy Officer.

Using your social insurance number (SIN)

If we've collected your SIN, we'll use and disclose it for tax reporting purposes, and to meet other legal and regulatory requirements.

We'll also use it for record keeping purposes, including linking your products to you and keeping your information separate from other people with similar names.

If you'd like to opt out of us using your SIN for non-tax reporting purposes, you can write to or email us.

Using your personal information for continuous improvement

To better serve you, we'll review and analyze the information you provide to us. It's important that we have a well-managed relationship with you.

We may ask for your help to improve client services and business processes, such as asking you for feedback or to fill out a survey.

How we share your personal information

We only disclose your information to those who need it to administer your products and provide you with information on products and services you already have or that may be available to you.

For example, we may disclose your personal information to:

- Your advisor or people who work with your advisor.
- Any healthcare provider, plan administrator (including their service providers and advisors), other insurance or reinsurance companies, administrators of government benefits or other benefits programs.
- Other organizations we work with to handle claims and/or manage your plan or product.

We may also disclose your information to our service providers, which can include:

- Paramedical examiners
- Medical laboratories
- The Medical Information Bureau (MIB)
- Specialty coverage providers
- Claims assessors
- Local independent medical examiners
- Pharmacy benefits managers
- Travel assistance providers
- Technology suppliers

We will never sell your personal information to anyone.

Sharing your personal information outside of Canada

We may collect, use, and disclose your personal information outside of Canada or outside your province of residence as part of day-to-day business. We'll do this so that we, or our service providers, can administer and manage your application and your products, services, or claims.

For example, we may collect or share personal information outside of Canada when:

- You're outside of Canada and we need to talk with a service provider in your location.
- You apply for medically underwritten coverage, and we send your blood sample to a specialized lab in the United States to assist with the underwriting.
- You submit a claim incurred while out of province or while travelling outside of Canada, and we need to contact the healthcare provider to get more details about your claim.

How to manage your rights when it comes to your information

Providing your consent

You agree that we may collect, use, and disclose your personal information only for the purposes set out in these guidelines, as you otherwise have consented to, or as required or permitted by law.

We collect consent in writing, verbally, or electronically. Your consent may also be implied. For example, we may use your personal information to administer your products.

Withdrawing your consent

Your consent for us to use your personal information is valid until you withdraw it.

You may withdraw your consent for specific uses (subject to legal and contractual restrictions) through your online account, or by writing to Canada Life.

If you withdraw your consent, there may be situations where we're not able to provide you with the products or services you have requested.

Want to change or request access to your personal information?

It's important that your personal information is accurate and up to date.

We rely on you to provide accurate information and to contact us when your personal information changes. You have the right to ask us to change or correct information we have collected about you. Where you tell us your personal information is wrong or incomplete, we'll update or correct it as soon as possible.

If you'd like more details about your personal information including what information we have about you and how it's been used and disclosed, please contact us in writing. We'll give you the information, except in certain cases allowed by law.

Have any concerns, questions or requests?

Email us using our accessible webform or write to our Privacy Officer about any privacy concern, inquiry or request.

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