

Privacy Guidelines

Canada Life follows the key privacy principles below when collecting, using, or disclosing your personal information. References to “Canada Life”, “we”, “our”, or “us” collectively refers to The Canada Life Assurance Company and its Canadian affiliates.

Accountability

At Canada Life, we are responsible for all personal information under our control. This includes any personal information that is disclosed to a service provider. We have established these Privacy Guidelines, and policies and procedures, to keep your personal information safe.

Who is accountable?

Our directors, officers, employees, licensed representatives, and other persons and organizations who act for, or on behalf of, Canada Life are responsible for the protection of your personal information.

Access to personal information is limited to those who need it to either provide services to you or the organization.

Our Chief Compliance Officer monitors compliance with these Privacy Guidelines.

Protection of personal information by service providers

We make sure that our service providers protect your personal information appropriately in a way that is consistent with our Privacy Guidelines and in accordance with applicable laws.

Service providers may only collect, use or disclose your personal information in accordance with the authorized purpose.

Personal information may be subject to disclosure to law enforcement officials and other authorities where permitted or required by law, both inside and outside of Canada.

Identifying Purposes

We identify the purposes for collecting personal information before, or at the time the information is collected.

Consent

We collect, use and disclose your personal information with your consent for the purposes identified, or as permitted or required by law.

Consent

We may collect your consent in different ways. It may be expressed in writing or be implied, provided to us verbally, electronically, or through an authorized representative.

Subject to legal or contractual restrictions, your consent can be withdrawn at anytime; however, withdrawing your consent may impact our ability to continue to provide you with the products or services you requested.

Where previously provided, you may withdraw your consent to use your SIN for identification and record keeping purposes.

You may withdraw your consent to receive information about other products and services available from Canada Life which may help in planning your financial security.

Limiting Collection

We only collect personal information that is necessary for the purposes identified.

Personal information we collect about you

Depending on the product or service, personal information we collect about you may include, but is not limited to:

- Identification information, such as name, address, telephone number, e-mail address, date of birth, driver's license, or other identifying information;
- Financial information, such as place of employment, annual income, assets, liabilities or banking information;
- Health or lifestyle information, such as job, travel history or plans, driving record, or criminal record; or
- Medical information, such as healthcare provider, medical history or family medical history.

How we collect your personal information

The personal information we collect is obtained from applications and other forms collected directly from you or through your authorized representative. We may also collect your personal information from third parties including health care providers, clinics, other insurance companies and the Medical Information Bureau (MIB).

Use, disclosure and retention

Unless consent is provided, or it is permitted or required by law, your personal information will not be used or shared with a third party for a purpose other than that for which it was collected.

We may be required to use or disclose your personal information in order to protect our interests in a civil proceeding or a proceeding involving criminal activity, fraud, or misrepresentation. We will keep personal information only as long as necessary to fulfill the identified purpose and in accordance with our policies and applicable laws.

How we disclose your personal information

We may share your personal information with other companies or individuals to assess or service an application or a claim. We will only share personal information with those who need to know, for example:

- Our service providers;
- Your advisor or people who work with your advisor; or
- any healthcare provider, plan administrator, other insurance or reinsurance companies, administrators of government benefits or other benefits programs, other organizations, working with Canada Life to exchange personal information, when relevant and necessary to determine eligibility for coverage, to adjudicate claims, and to administer the plan

We may work with service providers outside of Canada. In those cases, your personal information will be subject to the laws that apply in those countries, including public authorities access laws.

We limit access to personal information in your file to Canada Life staff or persons authorized by Canada Life who require it to perform their duties and to persons to whom you have granted access. Your personal information may also be subject to disclosure to public authorities or others authorized under applicable law within or outside Canada.

Examples of how we may use your personal information

Personal information that we collect may be used to:

- Decide your eligibility for products, services or coverage for which you apply;
- Provide, administer, or service products or coverage you have with us. This may include investigating and assessing claims, paying benefits, and creating and keeping records concerning our relationship; or
- Perform internal data management and analytics by Canada Life and its affiliates.

What your personal information will not be used for

For example:

- Marketing from Canada Life: You will not receive any marketing or advertisements from Canada Life at the e-mail address you provide to us without your consent.
- Marketing from third parties: We will never sell your personal information to third parties.

How we use your SIN

We will collect your Social Insurance Number (SIN) where required by law for tax-reporting requirements.

In addition, where you provide consent, we may also use your SIN for identification and record-keeping, such as keeping your information separate from other customers and people with similar names.

Where you have consented to use of SIN for identification and record-keeping purposes, you can withdraw this consent at any time.

Managing the Relationship

The personal information that we collect will be used for the purposes of establishing your identity and determining your eligibility for products, services or coverage for which you apply, providing, managing, administering or servicing products or coverage you have with us, and for Canada Life's and its affiliates' internal data management and analytics purposes. This may include investigating and assessing claims, paying benefits, and creating and maintaining records concerning our relationship.

Communication

Your personal information will be used to communicate with you. The communication could be in the form of various methods including mail, email, text message, telephone, [an automatic dialing-announcing device], fax, other telecommunication channels or social media. The communications can be used for purposes including communications about features or details about the products, services, or coverage you have with us.

Continuous Improvement, Marketing and Promotions

To better serve you, we will review and analyze the information you provide to us. It is important that we have a well-managed relationship with you. As such, you may receive communications aimed at improving client services and business processes. These communications may request your feedback and appear in the form of a survey.

Based on the information we have about you and where you have provided consent, you may also receive promotions or communications that target, predict or market products and services by us that may be of interest to you.

Accuracy

We recognize the importance of ensuring that your personal information is accurate and up to date.

We rely on you to provide us accurate information and to contact us about any changes to your personal information. You have the right to ask us to change or correct information we have collected about you. Where your personal information is inaccurate or incomplete, we will make any necessary changes.

Safeguards

We take the protection of your personal information seriously. We use appropriate technical and organizational safeguards to protect your personal information against loss and any unauthorized access, use, or disclosure.

How we protect your personal information

All of 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. Our service providers are generally required

to protect their systems against unauthorized access and apply security standards that are, at a minimum, equivalent to ours. Our service providers are also contractually required to protect and only use your personal information for the purposes authorized by Canada Life.

Openness

This Privacy Guideline, as well as other policies and procedures, are always available to you. Please contact us if you are unable to access our website or require documents in another format.

Upon written request, we will respond to inquiries about our practices relating to the management of personal information. You can contact our Chief Compliance Officer with any inquiries or complaints.

Individual Access

Upon written request, we will provide you with details regarding your personal information including what information we have about you, and how it has been used and disclosed. Subject to certain exceptions permitted by law, we will provide you with access to the information.

Accessing your information

To protect your personal information, all requests for access must be made to us in writing.

Concerns, Inquiries or Requests

Any concern, inquiry or request related to privacy, should be made in writing to our Chief Compliance Officer using the below contact information:

Chief Compliance Officer

Canada Life | 100 Osborne Street North | Winnipeg MB | R3C 3A5
ChiefComplianceOfficer@canadalife.com