



## **Privacy Policy**

Lombard understands that your privacy is very important to you. We are committed to protecting your personal information. Personal information includes any information about an identifiable individual. This Privacy Policy guides our conduct in the collection, use and disclosure of personal information we obtain in the course of our business of providing insurance products and services to you. We want you to understand how we protect your privacy.

### **TYPES OF PERSONAL INFORMATION COLLECTED**

We collect personal information for the Identified Purposes outlined in this policy. The type of personal information that we hold depends upon the nature of your relationship with us, and includes, but is not limited to:

- name, address and telephone number;
- date of birth, family and marital status;
- credit rating and payment records;
- prior insurance experience including claims history;
- driver's licence number, vehicle identification number (VIN) and driving record;
- banking and credit card information;
- medical and health information;
- employment and income information.

We use or disclose such information only for the Identified Purposes described below.

### **LIMITING THE COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION**

We limit the collection, use and disclosure of your personal information to only what is necessary to provide you with the insurance protection that you have requested, or, in the case of a claim, to provide you with the compensation to which you are entitled. In order to do this, we collect, use and disclose your personal information for the following purposes (our "Identified Purposes"):

- offering and providing insurance products and services to you;
- establishing and maintaining communications with you;
- verifying your personal information with government agencies, brokers or agents, other insurers, insurance reporting agencies and credit bureaus;
- assessing and underwriting risks on a prudent basis;
- facilitating your payment of premiums and fees;

- investigating and paying claims;
- detecting and preventing fraud or other illegal activities;
- compiling statistics;
- complying with the law.

When we collect your personal information, we are doing so for all of the Identified Purposes simultaneously. Therefore, you can expect that while we may initially use the data for underwriting your policy, we may subsequently use it for claim purposes, and vice versa.

## **CONSENT**

We ask that you know our Identified Purposes and provide your consent to before we collect, use or disclose your personal information. You may provide your consent in a variety of ways. We rely on the following actions by you as indication of your knowledge and consent:

- by receipt of this Privacy Policy outlining our Identified Purposes, you provide your implied consent unless you notify us of the withdrawal of your consent;
- you provide your implied consent when you voluntarily provide personal information to Lombard through your broker or agent;
- you provide your express consent when you complete a written, verbal or electronic application process;
- we may also ask for your express consent for a specified purpose.

We will not disclose your medical and health information, or your employment and income information, without your express consent.

You may withdraw your consent, subject to legal or contractual obligations and on reasonable notice, but this may limit our ability to provide you with the requested product or service. In the event that you wish to withdraw your consent, you should contact Lombard's Privacy Compliance Officer first to understand the implications of such withdrawal, and then if you choose to proceed, give the requisite notice.

## **MAINTAINING ACCURATE INFORMATION**

Lombard will work to keep your personal information as accurate, complete and up-to-date as is necessary for our Identified Purposes.

## **PROTECTING YOUR PRIVACY**

We are committed to protecting your privacy. We maintain physical, electronic and procedural safeguards to protect your personal information from unauthorized access. We review our policies and practices, monitor our computer networks, test the strength of

our security and monitor our compliance with relevant laws in order to help us ensure the safety of your personal information. We restrict access to your personal information to those employees whom we have determined need to know that information to provide products or services to you. In addition, our employees are bound by a Privacy Code of Conduct. Employees who violate these standards are subject to disciplinary measures.

There are situations where we will disclose personal information in accordance with our Identified Purposes. For example, as part of the underwriting handling process, we may transfer personal information to other insurance companies including reinsurance companies which share in the risk. Additionally, personal information may be disclosed to government agencies, brokers or agents, other insurers or insurance reporting agencies for underwriting, claims, classification and rating purposes. We may also disclose personal information to businesses that provide goods and services to insurance companies and their customers, such as claims adjusters, appraisers and repair shops. As well, we may disclose personal information to government and regulatory agencies as required by law. 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. If we discover that third parties are improperly handling your personal information, we will take appropriate action to protect your personal information.

If you conclude your relationship with us, we will continue to safeguard the privacy of your personal information in accordance with this policy and as required by law.

Finally, personal information is retained only as long as it is needed, or to meet any legal, regulatory or tax requirements.

## **ACCESSING YOUR PERSONAL INFORMATION**

You can request access to your personal information that we have on file in order to verify the accuracy and completeness of the personal information. To request access, please send your written request to Lombard's Privacy Compliance Officer. We will respond to your request within 30 days or advise you if additional time is required to respond to your request.

There may be situations in which we are legally prohibited from allowing you access to your personal information. If this is the case, we will advise you of why, subject to any legal restrictions.

We may charge you for providing access to your personal information, however we will only do so after first advising you of the approximate cost.

If you believe that any of your personal information is incorrect, you can request that it be amended. We will amend personal information that is demonstrated to be inaccurate or incomplete and will make reasonable efforts to advise other parties to whom we have supplied your personal information of corrections that are needed. There is no charge for verifying and correcting information.

## CONTACTING US

If you have a question or complaint regarding our Privacy Policy or procedures, please contact our Privacy Compliance Officer:

Privacy Compliance Officer  
Lombard Canada Ltd.  
105 Adelaide Street West, 3<sup>rd</sup> Floor  
Toronto, Ontario  
M5H 1P9

Phone: (416) 350-4445  
Toll Free: 1-800-268-9680 Extension 4445  
Fax: (416) 350-4417

If we do not resolve your questions or complaint to your satisfaction, you may address your concerns to:

The Privacy Commissioner of Canada  
112 Kent Street  
Ottawa, Ontario  
K1A 1H3

Phone: (613) 995-8210  
Toll-free: 1-800-282-1376  
Fax: (613) 947-6850  
Website: [info@privcom.gc.ca](mailto:info@privcom.gc.ca)