

Privacy Policy



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1. Purpose of Policy

At The Union Life Mutual Assurance Company (hereinafter “UV Insurance”), we are committed to protecting the privacy of our clients, employees and agents, and to ensuring the confidentiality of the personal information provided to us in the course of our business.

Our Privacy Policy not only meets the requirements of the *Act respecting the protection of personal information in the private sector*¹ (hereinafter “ARPPIPS”), but also describes our standards for collecting, using, disclosing and retaining your personal information. This Policy also explains how we safeguard your personal information and your right to access that information.

This document is updated on an ongoing basis to ensure that you are aware of changes to our privacy practices, and to unify these practices and comply with the applicable legislation. We encourage you to review this Policy regularly for updates.

2. Scope

Drawing on industry best practices, UV Insurance affirms its commitment to comply with the laws and regulations governing privacy and to protect all confidential information in its possession. All UV Insurance employees who collect, use or disclose personal information are required to adhere to this Policy.

UV Insurance’s responsibility for privacy also extends to its agents, service providers and partners who offer the same high level of protection to your personal information.

3. Personal Information

Personal information is any information about an individual that identifies him or her, such as financial, lifestyle or health information.² Personal information is confidential, meaning that it cannot be disclosed without the consent of the individual concerned.

Personal information must be protected regardless of its characteristics or its form, whether written, graphic, audio, visual, computerized or any other form.

¹ *Act respecting the protection of personal information in the private sector*, CQLR, c. P-39.1.

² Section 1, ARPPIPS, CQLR, c. P-39.1.

4. Purpose of Information Collection

UV Insurance needs to collect information about you in order to provide you with high quality services. The nature and sensitivity of the information we collect about you vary depending on the services we provide and the legal requirements with which we must comply (such as your social insurance number, where investment income is generated by a selected product).³

Purposes for collecting information generally include providing you with the products or services you have requested, confirming your identity, preventing fraud or dealing with matters concerning the relationship between us.

Purposes for collecting your personal information are determined before or at the time of collection. For example, information is collected when you submit an application, open an account or submit a claim.

5. Consent

When we collect personal information about you, we obtain your consent to use it for the purposes for which it was collected. UV Insurance requires your consent to use your information for any other purposes or to collect additional information about you.

As a general rule, we require your express written consent to collect, use or disclose your personal information. When less sensitive information is involved, we may, under certain circumstances, accept your verbal consent. Occasionally, we may imply consent where it can be inferred from your action or inaction.

Consent must be given by you or your authorized representative such as a legal guardian or a person having power of attorney.

You may withdraw your consent at any time, subject to legal or contractual restrictions. For example, your right to withdraw your consent is necessarily limited where we need information to extend a loan against the value of a policy issued by us. We will inform you of the consequences of withdrawing consent, including the possibility that we may be unable to provide a product or process your request. If you choose to withdraw your consent, we will document our records accordingly. We ensure that the records we have are up to date and accurate when they are used.⁴

Under certain circumstances, we may be required or obligated to collect, use or disclose personal information without your consent. This occurs when legal, medical or security reasons may make it impossible or difficult to obtain consent.⁵ Where information is collected to investigate a possible breach of contract, to prevent or detect fraud, or to enforce the law, obtaining consent may be detrimental to the purpose for which the information is collected. In some cases, obtaining consent may be impossible or inappropriate if you are a minor, seriously ill or incapacitated.

³ Section 4, ARPPIPS, CQLR, c. P-39.1.

⁴ Section 11, ARPPIPS, CQLR, P-39.1.

⁵ Sections 18 to 23, ARPPIPS, CQLR, P-39.1.

6. Limits to Collection, Use and Disclosure

We limit the collection of your personal information to what is necessary for the purposes explained to you.⁶ We collect personal information directly from you, unless you allow us to collect this information from a third party or we have legal authority to do so.

We limit the use of your personal information to the purposes for which it was collected. This means that we cannot use your personal information for any other purpose without your consent, except as required by law.

When necessary, and only with your consent or where permitted by law, we may disclose your personal information to certain authorized parties for the proper management of your contract or to meet regulatory and/or legal requirements, including:

- Your insurance representative;
- Reinsurers;
- Service providers and agents who need the information to fulfill their contract or mandate and ensure the proper administration of our products;⁷
- Legal or judicial authorities, where required by law, for example in the case of fraud or criminal activity.

Notwithstanding the foregoing, your personal information is accessible only to authorized persons, and only to the extent necessary to perform their duties.

You have the right to know, upon request, to whom your information has been disclosed. We will refuse to disclose this information only in exceptional circumstances and in accordance with the law. We maintain accurate records of the persons to whom we have disclosed your information and the circumstances under which your information was disclosed.

We may, under certain circumstances, use service providers outside Canada, including the United States. We are responsible for the service providers' compliance with our Privacy Policy and will ensure that their level of protection of personal information is comparable to our own.

7. Retention

We retain your personal information as long as needed for the purpose for which it was collected. We are required to destroy that information in accordance with the law.⁸ At all times, employees shall take the security measures that are needed to ensure the protection of personal information collected, used, disclosed, retained or destroyed and that are reasonable given the sensitivity of the information, the purposes for which it is to be used, the quantity and distribution of the information and the medium on which it is stored.

When we destroy your personal information, we make sure that its confidentiality is safeguarded and that no unauthorized person can access it during the destruction process.

⁶ Section 5, ARPP/IPS, CQLR, P-39.1.

⁷ These service providers or agents undertake to comply with privacy legislation before any personal information is provided to them.

⁸ Sections 10 and 12, ARPP/IPS, CQLR, P-39.1.

8. Use of Personal Information for Promotional Purposes

In order to offer you, from time to time, products and services that may meet your needs, send you special offers and advice, and better serve you, UV Insurance may use the contact information you provided (name, address, phone number, email address, etc.) to contact you and may share a list of its clients' contact information with other companies that make up UV Insurance. You may withdraw your consent at any time by contacting us. This does not include communications about the product you own or administrative communications necessary for the proper management of your file.

In order to satisfy legal requirements, we must obtain your consent before allowing the companies that make up UV Insurance to use and share your personal information for promotional purposes, to the height of your expectations.

Your information will be used so that we can offer you a personalized experience and, from time to time, send you information, offers and advice tailored to your personal situation and interests. UV Insurance will not share your information with other companies without obtaining your prior consent or unless permitted by law.

We will never use sensitive personal information for promotional purposes without first obtaining your specific consent.

You may ask us at any time not to use or share your personal information with the companies that make up UV Insurance for promotional purposes by sending a written request to the Privacy Officer at the address indicated at the end of this document.

If you do not consent to the collection, use and sharing of your personal information, we may be unable to provide you with the requested products and services to the height of your expectations.

Please note that we do not sell our client lists to third parties.

9. Accuracy and Accountability

We make every possible effort to ensure that your personal information is as accurate and complete as necessary for the purposes for which it is collected, used or disclosed.

We are responsible for personal information in our possession or custody, including information that we entrust to third parties for processing. We require such third parties to keep personal information under strict standards of privacy and protection.

We adhere to legislated and self-imposed rules, aimed to safeguard your privacy. These rules are set out in this Privacy Policy, the UV Insurance Code of Ethics (applicable to directors, officers and employees) as well as insurance industry guidelines and other applicable legislation. Our staff is informed and adequately trained on our privacy policies and practices.

10. Security Safeguards

We have implemented and continue to develop rigorous safeguards to ensure that your personal information remains strictly confidential and is protected against loss or theft and from unauthorized access, disclosure, copying, use or modification.

These safeguards include:

- Organizational measures (e.g. use of security clearances and limiting access to a “need-to-know” basis);
- Physical measures (e.g. electronically managed access to offices for employees, off-site back-ups and archiving, etc.);
- Technological measures (e.g. use of passwords and encryption, frequent password changes, use of firewalls and segmented operator access, etc.).

We recommend that you use unique and strong passwords for your online accounts and not share your passwords with anyone.

11. Request for Access to Information and Correction

You have the right to know whether we have personal information about you and to inspect that information. You also have the right to enquire how we collected your personal information, how we used it, and to whom it may have been disclosed.

This information will be provided to you within a reasonable time from the date we receive your written request.

In certain specific circumstances, we may refuse to provide you with the requested information. Exceptions to your right of access may include:

- Requested information that would be prohibitively costly to provide;
- Information that contains references to other individuals;
- Information that cannot be disclosed for legal, security or commercial proprietary reasons;
- Information that was obtained in the course of an investigation into a possible breach of contract or to prevent or detect fraud;
- Information that is subject to solicitor-client or litigation privilege.

In cases where we have medical information about you, we may refuse to share it with you directly and request that it be forwarded to a health care professional you have designated to share the information with you.

You may verify the accuracy and completeness of your personal information and, if necessary, ask that it be corrected. We will respond to any request for correction within a reasonable time. Any request for access to information must be sent to the address indicated at the end of this document.

12. Security Incident

A security incident means the loss of, unauthorized access to or unauthorized disclosure of personal information resulting from a breach of UV Insurance's security safeguards. For example, the incident may be the result of mere human error or negligence, or it may be a failure to implement and enforce security safeguards.

An operational incident is defined as an event that causes or is likely to cause a disruption, slowdown or interruption of UV Insurance's critical activities and which could cause financial loss or damage to reputation.

However, a security incident related to the protection of personal information that results in financial loss or damage to UV Insurance's reputation is considered an operational incident.

In the event of a security incident, UV Insurance will ensure that a sequence of steps is followed to protect its client's personal information and limit the consequences.

Preliminary Assessment

The Compliance Department completes (for internal use) a privacy breach reporting form.

Upon completion of this form, an assessment is conducted by senior management to determine whether the nature of the incident requires reporting to the provincial or federal privacy commissioner. When it is determined that a security incident meets the definition of an operational incident mentioned above, UV Insurance notifies the Autorité des marchés financiers as quickly as possible, or at the latest, 24 hours after determining that the incident is said to be « operational ».

Containing a Privacy Breach

Following the preliminary assessment, immediate action is taken across the organization to limit the consequences of a loss or theft of personal information by ensuring that the non-compliant practice, if any, is stopped.

Comprehensive Assessment and Changes

At this stage, the situation is investigated further so that the internal standards, policies or directives in place at the time of the incident are identified and reviewed. The purpose is to verify whether they were followed by the persons involved and to identify the reasons why they were not followed, if any. In the case of a procedural error or an operational failure, it will be documented in the file and processes will be adapted to prevent a similar incident from recurring.

Finally, recommendations for medium- and long-term solutions are made and follow-up is done.

Rest assured that at UV Insurance we take our clients' privacy seriously and we are committed to doing anything and everything it takes to protect their personal information.

13. Limitation of Liability

The use of technologies such as the Internet carries substantial risk, making it impossible to guarantee that the personal information you provide is completely secure. However, rest assured that UV Insurance uses all reasonable means at its disposal to protect your data.

You therefore acknowledge that UV Insurance and its suppliers cannot be held liable for any damages or harm that may arise or result, directly or indirectly, from a privacy breach in relation to the data and/or information sent via the Internet to UV Insurance.

14. Transparency, Concerns and Complaints

Our employees can answer your questions and concerns about privacy and the protection of your personal information. To inspect your file, to make a complaint about non-compliance with privacy procedures or to obtain more information about the Privacy Policy, please contact us.

To contact us



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