

Privacy Policy

Introduction

The Northbridge group of companies is committed to protecting your personal information, and has created this Privacy Policy to provide you with information about its privacy practices. This Privacy Policy applies to all of the member companies of Northbridge, which includes Northbridge Financial Corporation, Northbridge General Insurance Corporation, Federated Insurance Company of Canada, and Zenith Insurance Company. In this Privacy Policy, the words “you” and “your” mean any person who has requested a product or service from us, and the words “Northbridge”, “we”, “us” and “our” mean the Northbridge group of companies.

Collection, use and disclosure of personal information

At Northbridge, we collect, use and disclose your personal information for the following purposes:

- offering and providing products and services to meet your needs;
- establishing and maintaining communications with you;
- verifying personal information you provide in your application;
- assessing and underwriting risks on a prudent basis;
- performing safety assessments;
- determining insurance product prices
- investigating and settling claims;
- detecting and preventing fraud or other illegal activities;
- analyzing business results and compiling statistics;
- conducting market research;
- reporting to regulatory or industry entities;
- acting as required or authorized by law.

These are our “Identified Purposes”.

We only collect, use and disclose your personal information for our Identified Purposes. When we collect your personal information, we are doing so not just for any one of the Identified Purposes, but for all of the Identified Purposes. For example, personal information we initially use for the purpose of underwriting your policy may subsequently be used for the purpose of investigating and settling your claim. Similarly, personal information we initially use for the purpose of investigating and settling your claim may subsequently be used for the purpose of underwriting your policy renewal. Should we wish to collect, use or disclose your personal information for a new purpose, we will explain the new purpose to you and obtain your consent before the information is collected, used or shared. We will only collect your personal information by fair and lawful means, and will not collect, use, disclose or retain your personal information without a valid reason for doing so.

Types of personal information collected

Personal information is information about an identifiable individual. The type of personal information that we collect and use depends upon the nature of your relationship with us, and may include:

- name, address, e-mail address, and telephone number;
- date of birth, gender, family and marital status;
- education and lifestyle information;
- banking, credit, and financial information;
- previous insurance and claims experience;
- driver's licence number and driving record;
- vehicle identification number (VIN) and vehicle information;
- medical and health information;
- employment and income information;
- policy type and number.

Consent

Your knowledge and consent are required before we may collect, use or disclose your personal information, except in situations permitted by the law, such as during a fraud investigation, or where we are required to disclose information by court order.

You may provide your consent in a variety of ways. By dealing with us on insurance related matters, you provide us with your implied consent for the collection, use, and disclosure of personal information necessary for the Identified Purposes. For example, you provide your implied consent when you request a quote or apply for insurance with us, or when you voluntarily provide personal information to us through your broker or agent.

Consent can also be given by one individual on behalf of another individual. For example, where an individual applies for auto insurance for themselves and their family, the applicant is giving consent for the collection, use, and disclosure of personal information both for themselves and their family members even though the family members are not present during the application process.

While we may rely on implied consent in certain circumstances, we will not collect, use or disclose your medical and health information, your employment and income information, or your banking, credit or financial information, without your express written or verbal 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 our Privacy Officer for information regarding the implications of such withdrawal, and then if you choose to proceed, give the requisite notice.

Where permitted by law, you may be given the option to give your express consent to us to access your credit information from a credit reporting agency. We will use this credit information for the purpose of assessing risk, providing you with a quote, and determining your

eligibility for a premium discount. We may continue to retrieve your current credit score from time to time, while you remain a customer of ours, unless you withdraw your consent for us to do this.

Maintaining accurate information

Northbridge will ensure that your personal information is 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. All employees of Northbridge are required to comply with this Privacy Policy. Employees who violate this Privacy Policy are subject to disciplinary measures.

As part of maintaining our relationship with you, we may share your personal information within the Northbridge group of companies, but only for the Identified Purposes, and in accordance with this Privacy Policy.

We may also disclose your personal information to third parties 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.

We may use service providers located outside of Canada to collect, use, disclose or store personal information. Where we do so, we will contractually require such third party to employ the appropriate security safeguards to protect your personal information, subject to the law in the third party jurisdiction. While the personal information is in another jurisdiction it may be accessed by the courts, law enforcement and national security authorities of that jurisdiction. The jurisdictions where personal information may be collected, used, disclosed and stored include the United States of America. To obtain further information about our policies and practices with respect to privacy, you may contact our Privacy Officer as indicated below.

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. Your personal information will be retained by us only as long as it is needed, or to meet any legal, regulatory or tax requirements.

Accessing your personal information

You have the right to access your personal information that is in our possession or under our control in order to verify the accuracy and completeness of the personal information. To request access, please send your written request to Northbridge's Privacy Officer. We will respond to your request within thirty 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, complaint, or wish to provide feedback regarding our Privacy Policy or procedures, please contact our Privacy Officer:

Privacy Officer
Northbridge Financial Corporation
105 Adelaide Street West, 7th Floor
Toronto, Ontario
M5H 1P9

Toll Free: 1-800-268-9680 Extension 4445
Phone: (416) 350-4445
Fax: (416) 350-4417
Email: privacy@nbfc.ca

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

Office of the Privacy Commissioner of Canada
30 Victoria Street
Gatineau, Québec
K1A 1H3

Toll-free: 1-800-282-1376 (toll free)
Phone: (819) 994-5444
Fax: (819) 994-5424
TTY: (819) 994-6591
Website: www.priv.gc.ca

This Privacy Policy may be amended from time to time. Please check our website for any amendments and for the current version of this Privacy Policy.