



**EXPERIOR FINANCIAL GROUP INC.**

**PERSONAL INFORMATION PROTECTION AND ELECTRONIC DOCUMENTS  
ACT (PIPEDA)**

**POLICIES AND PROCEDURES**

Privacy Compliance Officer: Connor Moseley

- 660 Speedvale Ave West, Suite 205
- Guelph, ON
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## Table of Contents

Our Commitment.....	2
What is Personal Information? .....	2
PIPEDA’s 10 Principles – Our Responsibilities and How We Comply.....	2
Principle 1 - Accountability: .....	3
Principle 2 - Identify Purposes for Collection: .....	3
Principle 3 - Consent: .....	3
Principle 4 - Limit Collection of Information:.....	4
Principle 5 - Use, Disclosure, Retention:.....	5
Principle 6 - Accuracy:.....	5
Principle 7 - Safeguards: .....	5
Principle 8 - Openness: .....	6
Principle 9 - Individual Access:.....	6
Principle 10 - Provide Recourse: .....	6
Appendix A.....	7
Safeguarding information .....	7
Physical Safeguards.....	7
Operational Safeguards .....	7
Technological Safeguards .....	8
Training .....	8
APPENDIX B.....	9
Receiving and processing access requests - the Rules.....	9
APPENDIX C.....	11
Receiving and Responding to Inquiries and Customer Complaints – Our procedures.....	11

















## APPENDIX B

### Receiving and processing access requests - the Rules

Because we obtain customer information by providing services in connection with those applications and any policies, or when monitoring Agents, any activity we undertake relating to customers' Personal Information obtained for these purposes must be accomplished through or on behalf of the insurance company. Customer information is generally covered by their consent when processing applications for submission. We may access other customer information that we house on our systems or provide to us in order to assist the Agent in a sales function, for example.

When we receive an access request from a customer, we must determine whether the information requested was collected on behalf of the insurer or Agent. For example, when an Agent performs a needs analysis with a customer, he or she collects quite a bit of information that is not provided to the insurer that is ultimately asked to provide insurance. We may provide software support to the Agent to house his or her client files, including needs analyses. In addition, we may access these client files from time to time in order to fulfill our monitoring obligation delegated by the insurers or to support an Agent in the sale. If a customer wishes to access the needs analysis only, the Agent will have to respond to the request. Realistically, any access request will be more general and will involve information collected on behalf of both insurer and Agent. In contacting both Agent and insurer, from time to time we may be asked to respond on their behalf. If we do so, we require written instructions from both parties.

Should an individual wish to access their personal information, the request must be made in writing to Experior's compliance officer, Connor Moseley, at [compliance@experiorheadoffice.ca](mailto:compliance@experiorheadoffice.ca), or:

Experior Head Office  
660 Speedvale Ave. W, Suite 205  
Guelph, ON  
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The following rules apply:

- The response to a customer's access request must be made within 30 days. This can be extended for a maximum of 30 additional days, if:
  - Responding to the request within the original 30 days would unreasonably interfere with the parties' activities
  - More time is necessary to conduct consultations or to convert PERSONAL INFORMATION to an alternate format.
  - If a time extension is needed, the individual must be notified within 30 days of receiving the request, and of his or her right to complain to the OPCC.
- Assistance must be provided to any customer who needs to prepare a PERSONAL INFORMATION request.

- The individual may be asked to supply enough information to enable the parties to account for the existence, use and disclosure of PERSONAL INFORMATION.
- Access must be provided at minimal or no cost to the individual.
- The individual must be notified of the approximate costs before processing the request and asked to confirm that the individual still wants to proceed with the request.
- The requested information must be understandable, and acronyms, abbreviations and codes must be explained.
- The parties must send any information that has been amended, where appropriate, to any 3rd parties that have access to the information. This includes MGAs.
- The individual must be informed in writing when an access request is refused, setting out the reasons and any recourse available.

**Customer Access Requests** - Our Procedures - If we receive a request directly from a customer or through an Agent on a customer's behalf:

- Ask the requestor to name the insurer(s) involved. Do not disclose any information to the requestor. We have no regular contact with customers and cannot set up an authentication process that is robust enough to allow us to release PERSONAL INFORMATION. Even confirming the existence of insurance policies is inappropriate because we have not authenticated the requestor and ensured that he or she is entitled to the information.
- Do not attempt to discuss any concerns that might have given rise to the request. Remember that well-meaning conversation with customers can often help them "crystallize" a complaint when in fact their original intention was not to complain.
- If the requestor is the Agent, ensure that the Agent understands the process to be followed and that any customer PERSONAL INFORMATION collected on behalf of the insurer is not released directly to the Agent.
- Anyone, including the Agent, making a request on someone else's behalf needs written authorization from the owner of the PERSONAL INFORMATION. Make sure the requestor knows this.
- Notify the PC Officer of the request.
- The PC Officer should notify the Agent and/or insurer(s)' contact person directly and ask for written instructions as to whether they will handle the request or require us to be involved. We will require instructions on handling any PERSONAL INFORMATION in our possession, including whether the information needs to be provided in a certain format, the deadlines for providing the information, etc.
- **Agent or Employee Access Requests:** Notify the PC Officer, who will handle all such requests or delegate as needed.

## APPENDIX C

### Receiving and Responding to Inquiries and Customer Complaints – Our procedures

If we receive a privacy-related complaint directly from a customer or through an Agent on a customer's behalf:

- Do not volunteer information about policies or insurers involved. Explain that the complaint will have to be made directly to the Agent and/or insurer(s) involved. Ask the requestor to name the insurer(s).
- Do not engage in discussions with the complainant about the complaint. Once again, you don't want to be in the position of helping individuals "crystallize" their complaints.
- Notify the PC Officer. The PC Officer should:
  - notify the insurer(s)/Agent involved and ask for written instructions if our assistance is required in providing PERSONAL INFORMATION or resolving the complaint;
  - ask the parties to keep us apprised so that we can record the decision and make any necessary changes to our policies and procedures and close the complaint off in our complaint log.
- **Agent or employee inquiries or complaints:** Notify the PC Officer, who will handle all such inquiries or complaints, or delegate as needed.