

## **AG Direct Hail Insurance Ltd. Privacy Policy**

**Effective Date:** Jan 1 2014

**Revised:** March 2018

**Revised:** April 2021

**Revised:** Oct 2021

**Revised:** April 2024

**Revised:** March 2025

**AG Direct Hail Insurance Ltd.** has made a commitment to respect the privacy rights of individuals by ensuring that their Personal Information is collected, used and disclosed in such a manner that a reasonable person would consider appropriate in the circumstances. Any personally identifiable information concerning an individual is Personal Information and will be treated in accordance with this Privacy Policy, which policy shall be effective as and from January 1<sup>st</sup>, 2014.

### **Introduction**

As a responsible insurer, we have always adopted appropriate guidelines regarding the privacy and confidentiality of information pertaining to our clients.

On January 1, 2004, the federal *Personal Information Protection and Electronic Documents Act* ("PIPEDA") came into force and began to apply broadly to businesses, including our organization. PIPEDA requires business organizations to establish rules to govern the collection, use and disclosure of personal information in a manner that recognizes the right of privacy of individuals with respect to their personal information and the need of organizations to collect, use or disclose personal information for purposes that a reasonable person would consider appropriate in the circumstances.

Since the introduction of PIPEDA, privacy rights in Canada have been further protected with other legislation including the June 2015 'Digital Privacy Act' amendment and Nov 2023's Bill C-11, An Act to enact the Consumer Privacy Protection Act and the Personal Information and Data Protection Tribunal Act.

AG Direct Hail's Privacy Policy and our internal procedures incorporate the principles and rules set out in PIPEDA, along with recent related updates and requirements.

### **Purposes for Personal Information**

We collect, use, and disclose Personal Information for the following Identified Purposes:

- Offering you our insurance products and contracting with you for these products, and maintaining communication with you for such purposes and for the purpose of administering your insurance policies, including the determination and payment of fees and premiums;
- Verification of the accuracy of your personal information with appropriate persons including but not limited to government agencies, brokers, agents and other insurance companies;
- Analyzing, assessing and underwriting risks including verification of insurance in force with other insurers;
- Investigating and adjusting claims, conducting appraisals and obtaining reinsurance;
- Detection and prevention of improper conduct, fraud or other illegal conduct;

- Compiling statistics for the industry;
- Purposes required by law; and
- Other purposes reasonably considered by us to be relevant to your policy of insurance and those purposes which have been specifically consented to by you.

## Consent

Your knowledge of the uses and disclosures intended for the Personal Information collected by us, and your consent for the identified Purposes is important to us. We will rely on various actions for the purpose of confirming your consent to use and disclosure of your Personal Information provided to us or currently in our possession, including:

- Your provision of Personal Information to us whether directly or through an insurance broker or agent, adjuster, or other representative for the purposes of acquiring an insurance contract or in the course of our administration of our obligations to you under such policy.
- Your express consent or acknowledgement in connection with a written, verbal, or electronic application process.
- Your receipt of this Privacy Policy unless you notify our Privacy Officer to the contrary.
- Your consent given through your authorized representative including your agent or power of attorney.

We are entitled to assume your consent to the use and disclosure of Personal Information for Identified Purposes for Information in our possession prior to the date of any application, including that in our possession prior to January 1<sup>st</sup>, 2004, from the fact of your making an application for insurance and desiring to conduct business with us.

We will limit our collection of Personal Information to that required for the Identified Purposes or required or otherwise permitted by law. If we require Personal Information for additional purposes other than Identified Purposes or those disclosures permitted by law, we will notify of such purposes and obtain your consent prior to use or disclosure for such purposes.

We will only retain Personal Information so long as it is relevant to the Identified Purposes. For clarity, we do reserve the right to retain Personal Information until the expiration of your right in law to enforce a right of claim under a policy or insurance between you and us.

We may use a “cookie” or similar technology to assist us to customize our website(s). A “cookie” is a data file that a website sends to a user’s computer while that user is viewing the site. These data files include information that allows a website to remember information that will make that user’s use of the website more efficient and helpful to him or her. Cookies do not damage computer systems or files, and only the website that transferred a particular cookie to you can read, modify, or delete such cookie.

If you don’t want to use cookies with our site(s), there are simple procedures in most browsers that allow you to delete existing cookies, to automatically decline cookies or to be given the choice of declining or accepting the transfer of particular cookies to your computer. Please refer to your browser instructions or help screen to learn more about these functions. You should note that declining cookies may significantly impair your use of our Sites.

You have a right to withdraw your consent at any time by informing our Privacy Officer to such effect in such manner as we may reasonably request. Such withdrawal of consent may result in our inability to provide you with insurance coverage, and we will inform you of this being the case. Additionally, in conjunction with an application for insurance you have agreed that your withdrawal of consent cannot be effective with respect to Personal Information relevant to an existing policy of insurance until the expiration of your right in law to enforce a right of claim under a policy of insurance between you and us.

## Our responsibility

We will protect your Personal Information by adopting and implementing security procedures appropriate to the sensitivity of the particular Personal Information, which may include such measures as insuring the information is kept under lock and key, restricted access to those personnel who for valid business purposes require access and restricting access to electronic storage by employment of technological safeguards. Appropriate security measures will be adopted in regard to the removal or disposal of Personal Information retained by us for accuracy and completeness and have it amended as appropriate.

## Our Privacy Office and Compliance

**AG Direct Hail Insurance Ltd.** has designated the individual identified below as its Privacy Officer. Any inquiries concerning the following should be directed to them:

- Additional information on our policy, practices and procedures;
- Requests by individuals for access to their Personal Information in our possession;
- Concerns related to the accuracy or completeness of Personal Information held by us and the provision of clarifications and updates;
- The filing of complaints concerning compliance by us with PIPEDA, and information concerning the appropriate procedures related to such complaints;
- Procedures employed by us in connection with any of the foregoing; and
- Any suggestions on this Privacy Policy which would improve our service to you

### Privacy Officer

Bruce Lowe  
Toll Free: 1-855-686-5596  
Office: 587-453-3100  
Fax: 587-349-3334  
[bruce.lowe@hubinternational.com](mailto:bruce.lowe@hubinternational.com)

**AG Direct Hail Insurance**  
100 5904 50 Street  
Leduc, AB T9E 0R6

In addition, our Privacy Officer is responsible for insuring our compliance with this Policy and the requirements of PIPEDA as well as the *Consumer Privacy Protection Act*, including adopting procedures designed to insure compliance, investigating and responding to a challenge that there is a perceived failure to comply with PIPEDA's requirements. Our Privacy Officer reports directly to senior management.