

# Combined Canada Privacy Policy

## 1. Introduction

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This Privacy Policy (“Policy”) describes how Combined Canada (“Combined Canada”), a branch of Combined Insurance Company of America (“CICA”), collects, uses, discloses, and protects the Personal Information of individuals who apply for, purchase, or receive Combined Canada products and services.

The Policy (“Policy”) applies solely to the Personal Information practices of Combined Canada. This Policy expands on and specifies the application of the CICA Privacy Policy in the Canadian legal and regulatory context and can be found at <https://www.combinedinsurance.com/ca-en/>.

The Policy applies to Personal Information collected or used by Combined Canada in relation to Combined Canada products and services accessed via our website, mobile applications, and telephone or in person.

## 2. Personal Information We Collect

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“Personal Information” means information about an identifiable individual. The Personal Information we collect may include:

- a. Identifiers: Name, address, date of birth, social insurance number (“SIN”).
- b. Contact information: Phone number, email address.
- c. Financial information: Income, employment, assets & liabilities, payment information.
- d. Personal Health Information: Medical history, condition, disabilities, etc.
- e. Audio call recordings.
- f. Online activity: IP address, browsing history, page visits, links clicked, duration on pages, location data such as IP address location, etc. are governed by our website’s Terms of Use posted on our website.

## 3. Sources of Personal Information

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We collect Personal Information directly from individuals or from third party sources, always with appropriate consent when required:

- a. Directly from individuals/customers through applications, forms, surveys, website use, etc.
- b. Healthcare providers, Insurance databases such as MIB
- c. Agents, Brokers, Service Providers acting for customers or on our behalf
- d. Publicly available sources

## 4. Purposes for Collecting Personal Information

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We collect Personal Information to provide individuals with products and services. Specific purposes may include:

- a. Establishing identity and determining eligibility
- b. Providing quotes or advice
- c. Underwriting and administering policies
- d. Processing claims
- e. Internal modeling, analytics, and improvement of products/services
- f. Communicating, marketing, and providing customer service
- g. Meeting legal and regulatory requirements

We limit collection, use, disclosure, and retention to what is necessary for identified purposes. We obtain consent where required by law before collecting, using, or disclosing Personal Information for a new purpose.

## 5. Use and Disclosure of Personal Information

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We may use or disclose Personal Information internally, between Combined Canada and CICA and Chubb Group of Insurance Companies, brands, affiliates, and subsidiaries, to provide individuals with products and services and for other purposes identified here.

We do not sell Personal Information. We may share Personal Information with third party service providers acting on our behalf and pursuant to contractual restrictions regarding information use and disclosure.

We may disclose Personal Information without consent to comply with legal requirements, for example in response to a court order or law enforcement request, as required or permitted by PIPEDA or other laws.

We may disclose anonymous, de-identified or aggregated information to third parties, but this information will not be identifiable to any individual.

## 6. Safeguards

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We store your Personal Information outside of Canada.

We implement physical, technical, and organizational safeguards appropriate for the sensitivity of Personal Information in our custody or control. These safeguards aim to protect Personal Information from unauthorized access, use or disclosure.

We require third party service providers to protect the Personal Information they process on our behalf consistent with privacy and security obligations under our contractual agreements.

We retain Personal Information only as long as necessary to meet identified purposes or as legally required. When no longer required, we have a roadmap to securely destroy the information.

## 7. Individual Rights

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Individuals may request access, correction, withdrawal of consent or request deletion of their Personal Information. They may also file a complaint with Combined Canada, the Privacy Commissioner of Canada or other competent authority regarding our Personal Information practices.

## 8. Changes to this Policy

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We may update this Privacy Policy from time to time as our Personal Information practices evolve. The revised Privacy Policy will be made available via our website. These changes will apply to the way we handle your Personal Information going forward. We encourage you to check this policy periodically for updates.

## 9. Contact Information

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If you have any requests, questions, or concerns regarding our Privacy Policy or practices, please contact our Chief Privacy Officer at:

Chief Privacy Officer  
P.O. Box 3720, MIP  
Markham (Ontario) L3R 0X5  
Email: [Compliance@ca.combined.com](mailto:Compliance@ca.combined.com)

To fill out a Personal Information request visit <https://www.combinedinsurance.com/ca-en/>. We will respond to requests as soon as possible and generally within 30 business days.