

**April 17<sup>th</sup> 2014**

**Privacy Policy – National Truck League Insurance Brokers Inc.**

National Truck League is committed to protecting the privacy of the information we collect with respect to our customers, former customers, applicants, claimants and other individuals involved in the issuance and maintenance of our insurance protection products.

Our customers have trusted us in the protection of their privacy for 26 years.

The introduction of the Personal Information Protection and Electronics Documents Act (PIPEDA) which comes into effect on January 1, 2004 for most Canadian companies sets out, in law, the rights of the individual and obligations of the Company with respect to our privacy policy. In addition, the Act sets forth standards which companies must adopt to ensure this privacy is maintained. A brief overview of these standards is as follows:

**Accountability**

National Truck League is responsible for personal information in our control and will appoint an individual who is responsible for our compliance with the following standards.

**Identifying Purposes for the Collection of Personal Information**

National Truck League will identify the reasons for which we collect personal information at the time of collection.

**Obtaining Consent**

National Truck League will not collect, use or discuss your personal information without your knowledge and consent, unless permitted or required by law.

**Limiting Collection**

We will limit the collection of personal information to that information necessary to satisfy the purposes disclosed to you.

**Limiting Use, Disclosure and Retention**

National Truck League will not use or disclose personal information for purposes other than those identified to you or as permitted or required by law. Personal information will be maintained only as long as it fulfills those identified purposes.

**Accuracy of Personal Information**

Personal information will be as accurate, complete and up-to-date as is necessary to satisfy the purposes for which it was collected.

**Security and Safeguards**

National Truck League will protect the personal information with safeguards appropriate to the sensitivity of that information.

**Openness Concerning Policies and Procedures**

National Truck League will make readily available to both customers and employees information about policies and practices relating to the management of personal information.

## **Individual Access to Personal Information**

National Truck League shall inform a customer or employee of the existence, use or disclosure of personal information upon request and shall give the individual access to that information. The individual will have the opportunity to challenge the accuracy and completeness of that information and have it amended as appropriate.

## **Challenging Compliance**

A customer or employee shall have the right to challenge the company's compliance with the above standards to the designated individual responsible for the company's compliance .

**The ten standards as listed above form the basis of National Truck League's policies with respect to the protection of personal information. As these 10 standards are interrelated, National Truck League will adhere to them as a whole. Each standard must be read in conjunction with the attached commentary.**

## **Definitions**

### **Personal Information**

Any information about an identifiable individual which is not readily available as a result of an individual's position in a company, such as title and business contact information. It does include, but is not limited to, name, address, gender, birth date, personal health information, marital status, etc.

### **Privacy Officer**

The Company shall appoint a Privacy Officer who shall be responsible for the compliance with the Company's policies and procedures relating to the protection of personal information and who is identified to the public as the individual to whom questions, concerns or complaints arising from the administration of these policies and procedures should be addressed.

### **Collecting**

The act of gathering , recording or obtaining personal information from any source, including third parties, by any means.

### **Consent**

Voluntary agreement with the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and be given directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing and is unequivocal and therefore the preferred method of obtaining consent where information is sensitive. Implied consent is consent that can reasonably be inferred from a person's actions.

### **Information We Collect and Why We Collect It**

Information we collect is critical to us to ensure we meet your insurance protection needs, both now and in the future. The types of information we collect, and the sources from which we collect it, vary depending upon the particular situation. We may get this information directly from you , from your National Truck League agent, from your employer or from other third parties.

- We get information directly from you on application and other related forms such as name, address, birth date, gender ,marital status and certain vehicle information which we require in order to underwrite your application for insurance coverage, administer your policy and pay claims. If applicable, we may also collect income information should it be required to underwrite certain income protection plans.

- Even if you are not an insured with National Truck League, we may collect information about you from a related individual's application or other related forms such as would be required for beneficiaries and dependants.
- We get information from selected third party organizations to assist in the underwriting and claims adjudication process such as motor vehicle reports , driver's abstracts and claims history.
- We get information from your employer or group benefit supplier regarding any group benefit products you have such as name, address, birth date, gender, marital status and employee identification number, and
- We sometimes get this information indirectly, such as a referral from a colleague or through contact at conventions or trade shows.

We only collect personal information we require to provide you with the insurance protection and servicing you request.

### **Consent**

Given the nature of the insurance industry, consent may be implied in certain situations. For example, we sometimes provide insurance or amendments to existing policies over the telephone, on short notice or with little written documentation. In these situations it is impossible to obtain express written consent from you. Another example is that consent can be given by you on behalf of another individual such as where an individual applies for family insurance coverage even though the other family members are not present during the application process. By dealing with us on insurance related matters, we infer that we have your consent for the collection, use and disclosure of personal information necessary for the identified purpose.

You may withdraw your consent subject to legal or contractual obligations and on reasonable notice. Withdrawal of consent may limit our ability to provide you with the products and services for which you became a member. If you want to withdraw your consent, you should contact the Company's Privacy Officer at our Head Office to understand the implication of such withdrawal , and then if you choose to proceed, , to give the required notice.

### **How We May Disclose or Share Your Personal Information**

While acknowledging the importance of protecting personal information, we may find it necessary, in the course of conducting business, to disclose this information to selected third parties. Most of these situations relate to the sharing of your information with insurance companies to enable them to underwrite your insurance policy and administer claims to which you are entitled. Other situations where we may disclose or share your information include:

- Disclosure of banking information with our financial institution or credit card information in order that we may process monthly payments directly from your account
- Disclosure to other third parties for the administration of a group benefit plan or group marketing initiative such as the Shell Program.
- Disclosure to your employer with respect to your enrolment in a particular insurance product deemed a requirement of employment, and Disclosure as required or permitted by law.

**National Truck League does not sell any information about current or former customers, and we do not sell the fact that you are a customer or sell a customer list.**

## **Protecting Personal Information**

We are committed to maintaining the privacy and security of your personal information. To ensure personal information is used only in the manner for which it was intended, we have instituted the following procedures:

- Employees are required to comply with our Privacy policies and Procedures which exist to protect the confidentiality of customer information;
- Employees access to personal information is restricted to a need to know basis in order to underwrite or administer a policy, pay claims or provide customer service.
- We use manual and electronic security procedures to maintain the confidentiality of the information we collect and to guard against its unauthorized access or use.

## **Accessing Personal Information**

You have a right to submit a written request to access your personal information that is in our possession and make corrections to it. Such a request is to be made to our Privacy Officer at Head office at the address indicated below. We will respond to your request within 30 days or advise you that 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. For example, we would be so prohibited if allowing you access to your personal information would likely reveal the personal information of another individual or other confidential information. In such a case, we would advise you why, subject to legal restrictions.

We may also charge you for providing you access to personal information, however we would only do so after first advising you of the approximate cost.

We will amend any personal information which is inaccurate or incomplete.

## **Further Information and Contact**

If you have a question or complaint regarding our privacy policies or procedures, you may contact the individual accountable for our personal information protection compliance.

Privacy Officer  
National Truck League  
910 Wilton Grove Rd.  
London, ON N6N 1C7

If you make an inquiry or lodge a complaint and are not satisfied with the outcome, you may challenge that by writing a letter to our President requesting reconsideration of the matter. National Truck League's commitment is to promptly open a dialogue with you. If your concern remains unresolved, to your satisfaction, you may address your concerns to the Privacy Commissioner of Canada, 112 Kent Street, Ottawa, Ontario K1A 1H3