



LEIPSIC

PRIVATE RISK MANAGEMENT

PRIVACY POLICY

Protecting the confidentiality of personal information provided to Leipsic Private Risk Management ("Leipsic") has always been an important part of the way we do business.

As a client or advisor, we recognize that you have shared important personal information with us. You did this so we could serve you better and know we would honor and respect your privacy in accordance with requirements specified by law. Whether you are a client, or a prospective client, at Leipsic we are committed to offering you superior insurance advice and services, so it should come as no surprise that we are also committed to meeting high standards with respect to the protection of personal information.

Leipsic has appointed a Privacy Compliance Officer to ensure our compliance with applicable privacy laws and to respond to your questions or inquiries. The Leipsic Privacy Compliance Officer can be contacted as follows:

The Privacy Compliance Officer
Leipsic Private Risk Management
500 - 1661 Portage Avenue
Winnipeg, Manitoba
Canada R3J 3T7
204-953-5776
info@leipsic.ca

1. Providing Personal Information

We are responsible for maintaining and protecting your personal information while it is under our control, including with respect to any information provided to third parties for processing or to facilitate other administrative functions. Leipsic has established this Privacy Policy to set out the manner in which we collect, use, disclose and maintain personal information provided to us.

The personal information collected enables Leipsic to establish and maintain relationships with our clients, and to provide insurance brokerage services and requested insurance products and services. Leipsic provides information and advice to clients and their advisors concerning client assets, insurance products that are suitable for identified client needs, and reports and information concerning risk management issues relating thereto. We also use personal information provided to contact clients and advisors concerning other insurance or risk management related products or services.

Requested personal information provides Leipsic with the necessary information to better assist our clients and their advisors and to assess relevant ongoing needs for our available insurance products and services. In order to provide a higher level of service, we require accurate and up-to-date information.

2. Collecting, Using and Disclosing Personal Information

"Personal Information" means information about an identifiable individual and does not apply to corporate information or individual business contact information.

Leipsic may collect personal information directly from you or, with your express consent, from your designated financial advisor, insurance broker or agent, investment dealer or other authorized representative. Knowing you better helps us to understand your insurance needs, to communicate effectively with you, and to present you with service and product options that you may need or want.

Leipsic only collects personal information which is reasonably required to maintain our client relationship and to provide the products or services requested. While the personal information we require to properly meet your needs may vary with circumstances, standard information that we collect concerning clients or potential clients may include where necessary:

- (a) Name, address, telephone number, fax number, and e-mail address;
- (b) Birth date and marital status where relevant;
- (c) Insurance claims history;
- (d) Banking information, credit rating and payment records;
- (e) Details about your real and personal property and values of same;
- (f) Driver's record (i.e. abstracts, accidents, convictions);
- (g) Medical and health information where relevant to the products or services requested;
- (h) Employment information (including occupation and income) where relevant to the products or services requested; and

- (i) Identification numbers (driver's license or social insurance numbers) where necessary for the products or services requested.

Personal information collected by Leipsic is maintained in our database and is assigned a Client ID Code for identification.

Personal information may only be used by authorized personnel in the course of their employment duties. Personal information will only be collected, used and disclosed for the purposes for which it was collected, unless otherwise allowed by law.

Should Leipsic find it necessary to use or disclose your personal information for any other purpose than for which it was collected, subject only to limited exceptions specified by law, we will contact you to obtain your consent.

3. We Protect Your Personal Information

Whether in electronic or paper-based format, Leipsic uses security safeguards appropriate to the sensitivity of the information to protect personal information. We will not collect, use or disclose your personal information for any purpose other than those that we identify to you.

In the event that we transfer your personal information to a third party, such as for settling claims, we will use contractual or other means to provide a comparable level of protection. We will obtain the appropriate consent from you for the collection, use or disclosure of your personal information.

We will keep your personal information for as long as we need it to fulfill the stated purposes, to comply with limitation periods or as required by law. To prevent improper access, we will dispose of personal information by means of shredding paper files or deleting electronic records after a period of time required by applicable privacy laws and other governing regulations.

4. Consent

Your knowledge and consent is required before we may collect, use or disclose your personal information, except in special circumstances, such as during a fraud investigation or in situations otherwise permitted by law.

In obtaining your consent, we will always use reasonable efforts to ensure that you are advised of the identified purposes for which any personal information collected will be used or disclosed.

Consent may either be express or implied. We accept any of the following as your express consent for Leipsic's existing use and future collection, use and disclosure of your personal information:

- (a) Your provision of information to Leipsic, either directly or through licensed agents, insurance brokers, insurance companies, adjusters or service representatives;
- (b) Your express written consent; or
- (c) Your consent as provided by your authorized representative, such as a legal guardian or power of attorney.

Should you need to get insurance on behalf of your family, or anyone else, Leipsic will obtain the consent from those individuals (identifying your representation for them), for the collections, use, and disclosure of their personal information.

By implication, if you have an existing insurance policy with us and you request amendments to the policy, it is assumed that the consent that you have previously provided to us remains in effect and that you consent to any amendments to our privacy policy then in place.

5. Right to Access and Correct Personal Information

Leipsic informs its policy holders of the existence, use, and disclosure of his or her personal information upon request and shall provide access to that information in accordance with its obligations at law. Our clients are able to challenge or correct the accuracy and completeness of their personal information and have it amended where appropriate.

When a request is made in writing, we will inform you in a timely fashion of the existence, use and disclosure of your personal information and, where appropriate, you will be given access to that information. In order to safeguard personal information, we may require that applicants provide sufficient identification to permit us to authorize access to a file.

In certain exceptional situations, we may not be able to provide you with access to all of the personal information requested. Exceptions may include information that is prohibitively costly to provide, information that contains references to other individuals which cannot reasonably be severed, information that cannot be disclosed for legal, security or commercial proprietary reasons, information that is subject to solicitor-client or litigation privilege, or in certain circumstances,

information of a medical nature. If this is the case, Leipsic will provide the reasons for denying access upon request.

6. Information or Complaints

Leipsic has a complaints procedure in place to address issues in the event that there are concerns about Leipsic or our practices.

Should you require information or wish to submit a complaint or request please contact the Leipsic Privacy Compliance Officer.