



## **HL Hamilton Insurance Ltd Privacy Policy**

H.L. Hamilton Insurance Ltd provides a varied range of Insurance services. When you become a client of H.L. Hamilton Insurance Ltd you share important personal information with us. We are committed to protecting the privacy, confidentiality, and security of the personal information and ensuring the accuracy of the personal information we collect, use, retain, or disclose in the course of doing business. The principals in this privacy policy guide our employees and affiliates in this matter.

### *Personal Information:*

We define “personal information” as - oral, electronic or written personal details that are identifiable to an individual including (but not limited to):

Date of birth, personal address and telephone number, family status, age, gender, family and marital status, driving record, previous insurance and claims experience, banking information, credit rating, and payment records, medical and health records, personal assets or income are considered “personal information”. We collect this personal information because it is essential to the insurance products and services that we provide either directly to you or obtain through an Insurance Company or other affiliate on your behalf.

### *Identified Purposes for collecting Personal Information:*

H.L. Hamilton Insurance Ltd typically collects, uses and discloses personal information for the following purposes:

- Understanding and quoting insurance needs
- Assessing insurance applications and underwriting policies
- Communicating and negotiating with Insurance Companies and their affiliates
- Risk management
- Providing information about upgrades to coverage and additional products and services
- Determining and facilitating your payment of fees and premiums
- Arranging for financing of Insurance Premiums
- Establishing and maintaining communications with you
- Verifying your identity and the accuracy of your Personal Information with government agencies, industry associations, other brokers and insurers
- Evaluating and investigating claims
- Detecting, investigating or preventing fraud or other illegal activities
- Meeting legal and regulatory requirements
- Analyzing business results
- Compiling statistics

H.L. Hamilton Insurance Ltd also consults the personal information on our existing files for these purposes.

### *Consent for the collection, use or disclosure of personal information:*

Your knowledge and consent are required before we may collect, use or disclose your personal information, except in certain special circumstances as outlined in the privacy act. Consent may be express and implied. Express consent is explicit and obtained through verbal or written means. Implied consent is inferred when the purpose for which personal information is collected is obvious by the very nature of the transaction. We accept any of the following as your consent for H.L. Hamilton Insurance Ltd s existing use or future collection, use or disclosure of your personal information for identified purposes.

- Receipt of this Personal Information Policy, unless you advise us otherwise in writing.
- Your express oral consent when dealing by telephone.

- Your written consent.
- Your consent as provided by your authorized representative, a guardian or power of attorney
- If you have an existing insurance policy and you request amendments to the policy,
- For us to provide you with on-going coverage, it is assumed that the consent, verbal or written that you gave to us when you originally purchased the policy or requested a quote remains in effect.

If your personal information is not for one of the “identified purposes” listed, we will not use or disclose it without obtaining additional consent from you.

Consent to the use of and disclosure of your personal information can be withdrawn by notice in writing to our Chief Privacy Officer. Please note however, that withdrawal of your consent may result in us being unable to continue to provide insurance services to you.

H.L. Hamilton Insurance Ltd may disclose personal information to third parties who are necessary to assist in the provision of insurance products and services. Examples of such third parties are insurers, other brokers, risk managers, associations related to program business, premium finance organizations, banks, mortgagees, lien holders, lessors, claims adjusters, investigators, lawyers, accountants and others involved in the claims handling process. These organizations are limited in how they may use personal information and they are obligated to protect the privacy of information with which they have been provided.

#### *Retention of personal information:*

H.L. Hamilton Insurance Ltd keeps personal information only as long as it remains necessary in order to meet and maintain your insurance needs or as required by law.

#### *Safeguards of your personal information:*

Whether electronic or paper-based format, H.L. Hamilton Insurance Ltd maintains security systems to protect your personal information from unauthorized access, disclosure or misuse. Access is granted only to those who require it for authorized purposes. As well, when we no longer need your information, we take as much care to destroy it as we do when storing it.

#### *Accuracy and access:*

H.L. Hamilton Insurance Ltd takes reasonable steps necessary to ensure that your personal information is accurate and up-to-date. Of course, H.L. Hamilton Insurance Ltd relies on its clients and its third party suppliers to provide all material information and to notify us of any changes.

You have the right to access, review and if applicable correct the personal information held by us. However, the right to access is not absolute and there are certain exceptions established by law. For example, if the information which is requested is subject to a legal privilege, is confidential commercial information, or would give you access to someone else’s personal information the request may be declined.

A request for access to your personal information can be made in writing. Such requests must provide satisfactory identification and proof of entitlement. A reasonable charge may be made for providing requested information.

#### *How to contact us:*

Any individual who wishes to make inquiries about their personal information, or how it is used or disclosed, or wishes more information about H.L. Hamilton Insurance Ltd personal information practices may write to:

Chief Privacy Officer  
H.L. Hamilton Insurance Ltd  
102 Murray Street  
Amherstburg, Ontario  
N9V 1H9

This document may be amended from time to time. You may always obtain our most up-to-date version by contacting H.L. Hamilton Insurance Ltd’s Chief Privacy Officer

If you are not satisfied with H.L. Hamilton Insurance Ltd’s response to a privacy related inquiry or complaint, you may contact – Office of the Privacy Commissioner of Canada at 1-800-282-1376 or at [www.privcom.gc.ca](http://www.privcom.gc.ca)