

6. **Accuracy:** We will keep your *Personal Information* as accurate, complete and up-to-date as possible to fulfill the purposes for which it was collected. You can assist us in ensuring your records are current by providing us with any changes to your *Personal Information*, such as an address change. You have the right to challenge the accuracy and completeness of your *Personal Information* and amend it as necessary.

7. **Safeguards:** We will protect the *Personal Information* we collect from you with security safe-guards. Unencrypted, electronically transmitted information is not 100% secure. Therefore, we cannot guarantee the security of any information you transmit to us electronically or that you request us to transmit to you via public Internet.

Our systems and procedures are designed to prevent loss, misuse, unauthorized access, disclosure, alteration or destruction of your *Personal Information*. Only authorized employees and service providers of Equitable Life have access to your *Personal Information*. Some service providers may be located outside of Canada. Our commitment to security extends to the contracts and agreements that we sign with external suppliers and service providers.

8. **Openness:** We will make available to you information about our policies and practices relating to the management of *Personal Information*.

9. **Access:** We will give you access to your *Personal Information* at your request, subject to any legal or business restrictions. There may be a nominal charge for doing so.

10. **Challenging Compliance:** You may contact us with any questions, concerns or suggestions with respect to our ten privacy principles.

Our Commitment to Protecting Your Privacy



Chief Privacy Officer
One Westmount Road North
P.O. Box 1603 Station Waterloo
Waterloo, Ontario N2J 4C7

Telephone: 1.800.265.8878

Facsimile: (519) 883.7425

Email: privacyofficer@equitable.ca

Or visit our website at: www.equitable.ca

This Privacy Statement is governed by applicable provincial and federal laws and applies to all clients who are Canadian residents. It is subject to review and change from time to time to ensure its continued accuracy and relevance.

® denotes a trademark of The Equitable Life Insurance Company of Canada.

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What is Privacy?

The Privacy Commissioner of Canada defines privacy as an individual's right to maintain control over the uses and circulation of his or her *Personal Information*.

Our Commitment to You!

At The Equitable Life Insurance Company of Canada, our commitment to protecting the confidentiality and security of our clients' Personal Information has and always will be the most integral part of our corporate values. Equitable Life® has adopted the ten privacy principles established by the Canadian Standards Association's Model Code for the Protection of Personal Information. These ten principles form part of the Personal Information Protection and Electronic Documents Act ("Act"). This Act establishes rules governing the collection, use and disclosure of Personal Information.

What is Personal Information?

Under the Act, *Personal Information* is broadly defined as information (data) - oral, written or electronic - about an identifiable individual. *Personal Information* includes, but is not limited to, the following:

- name, address and telephone number
- age, gender, family and marital status
- identification numbers (such as Social Insurance Number or driver's license)
- financial and employment information
- credit rating, payment records
- previous insurance and claims experience
- medical and health information

What is NOT Personal Information?

The name, title, business address or business telephone number of an employee of an organization ("business card information") is not considered *Personal Information*. Any data that we have collected in which all the "personal identifiers" have been removed, making it impossible to determine the identity of the person to whom it relates, is also not considered *Personal Information*.

Why We Ask For Your Personal Information:

We ask you for information to establish and service your needs as a client. The Personal Information we ask for depends on the product or service you are requesting. For all products and services offered by Equitable Life, we need your name, address and some form of identification.

Here is why we need some of the other information we ask you to provide:

Birthdate

By providing us with your birth date we are able to better identify you and ensure that no one is trying to impersonate you. We may also use your birth date to determine your eligibility for products and/or services you are requesting.

Social Insurance Number (SIN)

Your SIN is required for certain benefits and products that earn investment income in order to comply with Canada Revenue Agency's income reporting requirements. If you provide your SIN, we may also use it to keep your information separate from other clients.

Financial Information

By providing us with your financial information, we are able to assess your eligibility for certain products and services.

Health Information

Your health information is required for certain products and services to ensure you are eligible for coverage.

Our Ten Privacy Principles:

- 1. Accountability:** All employees of Equitable Life are accountable for protecting the confidentiality and security of all Personal Information under their control. We have designated an individual to oversee our compliance with the Act and ensure that our ten privacy principles are upheld.
- 2. Identifying Purposes:** We will identify the purposes for which your Personal Information is being collected either before or at the time of collection. With your permission, your Personal Information may be collected, used and disclosed by Equitable Life for the following purposes:

- confirming your application information and assessing your eligibility for products and services;
- providing you with ongoing services, establishing and maintaining communication with you and responding to any inquiries you may have;
- assessing the suitability of Equitable Life's products or services for you or providing you with information on other Equitable Life products and services that may help meet your financial security needs;
- processing and adjudicating your claims and determining your eligibility for benefits;
- notifying you about Equitable Life events and activities;
- meeting legal and regulatory requirements.

For these purposes we may share your Personal Information within Equitable Life, with your financial advisor, broker, plan administrator, other insurance companies, insurance reporting agencies, credit bureaus and with any other person, corporation or enterprise.

- 3. Consent:** We will explain the reason for and obtain your consent before using your *Personal Information* for any purpose other than those listed above. We will only collect, use and disclose your *Personal Information* with your consent, except where otherwise required or permitted by law. Your medical and health information will only be shared with your consent. Equitable Life does not sell, trade or rent its clients' *Personal Information* to any organization for any purpose.

It is your right to choose not to provide us with some or all of your Personal Information. You may even deny us or withdraw consent to the use or disclosure of your Personal Information for certain purposes. However, it is important to remember that we require certain aspects of your Personal Information in order to establish your eligibility for certain products and services, or to continue to provide you with these products and services.

- 4. Limiting Collection:** We will limit the collection of your *Personal Information* to only those details that are necessary for the purposes identified.
- 5. Limiting Use, Disclosure and Retention:** We will only use your *Personal Information* for the purposes for which it was collected, unless you have consented otherwise, or when it is required or permitted by law. Your *Personal Information* will only be retained for the time necessary to fulfill the purposes for which it was collected, and to meet any legal or regulatory requirements.