



**MyLegacy**  
INSURANCE SERVICES

PERSONAL INFORMATION  
PROTECTION AND ELECTRONIC  
DOCUMENTS ACT (PIPEDA)

POLICIES AND PROCEDURES

## TABLE OF CONTENTS

Protecting Your Privacy and Confidentiality	3
Understanding Personal Information	3
Upholding Privacy: Our Commitment and Compliance with PIPEDA's 10 Principles	4
Principle 1 - Accountability	4
Principle 2 - Transparent Purpose Identification	5
Principle 3 - Consent	6
Principle 4 - Limited Collection of Information	7
Principle 5 - Use, Disclosure, Retention	8
Principle 6 - Accuracy	9
Principle 7 - Safeguards	10
Principle 8 - Openness	11
Principle 9 - Individual Access	12
Principle 10 - Provide Recourse	13
Contact Us	14
Appendix A - Safeguarding Personal Information	15
Physical Safeguards	15
Operational Safeguards	15
Technological safeguards	16
Assessing the Program	17



# POLICIES AND PROCEDURES (PIPEDA)

Training	17
Appendix B - Receiving and Processing Access Requests	19
Customer Access Requests - Our Procedures	20
Appendix C - Receiving and Responding to Inquiries and Customer Complaints	22
Contractor or Employee Inquiries or Complaints	23



## Protecting Your Privacy and Confidentiality

At MyLegacy Insurance Services, we prioritize the provision of insurance products and services to our contractors and their customers. To facilitate this, we gather specific personal information from both parties, acting on behalf of our insurance providers. Our dedication extends beyond mere compliance with legal obligations regarding personal information protection. We understand that the trust and confidence bestowed upon us by our contractors and insurers are vital to our business's prosperity. Safeguarding the confidentiality of personal information and respecting the privacy of the individuals who share it are paramount. This Policy applies to all our employees, as well as any third-party service providers or representatives we engage with.

## Understanding Personal Information

We believe in defining "personal information" as any factual or subjective information pertaining to an identifiable individual. This encompasses a diverse range of individuals we engage with, including group and individual life insured, beneficiaries, employees, contractors and insurance companies.

### **Examples:**

- Personal information includes details about an individual's name, age, gender, health, personal characteristics, financial circumstances, as well as opinions, evaluations, comments, social status and disciplinary actions intentions.
- Personal information may also encompass identification numbers (such as SIN or employee numbers), banking and income information, employment records, credit records and medical information.

Such information can be collected through various means, including written sources (such as correspondence and memoranda), electronic communications and

records, video or audio recordings photographs. It's important to note that personal information does not include the name, title, business address, telephone number and email address of employees within an organization. At MyLegacy Insurance Services, we are committed to handling personal information with the utmost care and respect for privacy.

## **Upholding Privacy: Our Commitment and Compliance with PIPEDA's 10 Principles**

Our company, MyLegacy Insurance Services, recognizes the importance of adhering to the principles outlined by PIPEDA (Personal Information Protection and Electronic Documents Act). These principles are derived from the Canadian Standards Association's Model Code for the Protection of Personal Information and impose specific responsibilities on insurers and AGAs/MGAs regarding the handling of customers' and contractors' personal information. To ensure transparency and clarity, our Privacy Policy is specifically tailored for contractors. It provides them with a comprehensive understanding of how we handle and manage their personal information, as well as the personal information of their customers.

### **Principle 1 - Accountability:**

**Requirement:** Designate an individual responsible for our company's compliance

#### **How we comply?**

At MyLegacy Insurance Services, we recognize the importance of accountability for the personal information in our possession or control. To ensure compliance, we have appointed a dedicated Compliance Officer. He/She diligently oversees our adherence to industry standards, legal requirements and regulations set forth by relevant authorities. We prioritize privacy and do not engage in outsourcing our processing to any third parties. MyLegacy Insurance Services operates in accordance with PIPEDA in Canada, ALPIPA

in Alberta, BCPIPA in British Columbia and ARPPIPS in Quebec, respecting the privacy rights and protection of personal information of our valued clients.

## **Principle 2 - Transparent Purpose Identification:**

**Requirement:** Promoting clarity in personal information collection

### **How we commit to transparency?**

At MyLegacy Insurance Services, we uphold the principle of transparent purpose identification when collecting personal information. We ensure that individuals are informed about the reasons for collecting their personal information, either prior to or at the time of collection. This information is communicated in writing whenever possible or orally, depending on the method of collection.

We collect personal information through various channels such as in-person meetings, applications/agreements or other appropriate means. Before or at the time of collection, we clearly identify the purpose for which the information is being collected. Our primary reasons for collection include fulfilling contracts with contractors and insurers, commission purposes and meeting regulatory obligations. We strictly adhere to fair and lawful methods of collecting information.

It is our commitment that we will not collect, use or disclose personal information beyond what is necessary to fulfill the specified purposes communicated at the time of collection. In cases where personal information needs to be collected for a previously undisclosed purpose, we will obtain consent from the contractor and clearly communicate the new purpose.

At MyLegacy Insurance Services, we do not directly collect personal information from customers. Instead, we rely on contractors as the primary source of information. We expect our personnel collecting personal information to be well-informed and capable of

explaining to individuals the purpose for which their information is being collected. This ensures transparency and fosters trust between us and the individuals whose personal information we handle.

### **Principle 3 - Consent:**

**Requirement:** Empowering privacy choices

#### **How we respect individual consent?**

At MyLegacy Insurance Services, we recognize the importance of obtaining valid consent from individuals before or at the time of collecting their personal information, as well as when a new use of the information is identified. We strictly adhere to the requirements set forth for obtaining consent.

To ensure compliance, MyLegacy Insurance Services seeks to obtain express consent whenever personal information is likely to be considered sensitive. This is especially true when the information is collected for purposes not previously identified. Express consent is actively sought from individuals either during or prior to the collection of their information.

In cases where the personal information is less sensitive, implied consent may be reasonably inferred. This occurs when the circumstances indicate that individuals would reasonably expect their information to be collected, used or disclosed for specific purposes.

In situations where an individual is unable to provide consent directly, such as in the case of a legal guardian or a person holding power of attorney, consent may be obtained from an authorized representative.

While consent is generally required for the collection, use and disclosure of personal information, PIPEDA allows for specific limited circumstances where knowledge

and consent may not be feasible or required. These include situations where the collection is in the individual's best interests, necessary for investigating breaches of agreements or laws, publicly available as specified in regulations or when information is provided in the course of employment or business.

Individuals have the right to withdraw their consent at any time, subject to legal or contractual restrictions and reasonable notice. MyLegacy Insurance Services will inform individuals of the implications of such withdrawal, which may include policy termination, benefits cessation or the inability to process a claim.

We are committed to respecting and honoring individual privacy choices through the proper and lawful obtaining of consent, ensuring transparency and empowering individuals in the handling of their personal information.

## **Principle 4 - Limited Collection of Information:**

**Requirement:** Balancing necessity and privacy

### **How we strategically and responsibly collect and curate data?**

At MyLegacy Insurance Services, we adhere to the principle of limited collection of personal information. We ensure that the collection is limited to what is reasonably necessary for the identified purposes. We prioritize the fair and lawful means of gathering information.

Indiscriminate collection of personal information is strictly avoided at MyLegacy Insurance Services. Both the quantity and type of information collected are carefully limited to what is reasonably required to fulfill the purposes identified.

We uphold our obligations to identify the purpose of collection and obtain the individual's consent for the collection, use and disclosure of their personal information. For instance, we collect customer information necessary for issuing policies or creating



files that enable our contractors to demonstrate the appropriateness of the sale. Contractor information is collected to assess suitability, ensure alignment with our organization, facilitate contracting with insurance carriers, determine commissions and fulfill regulatory requirements.

Our focus remains on balancing the necessity of collecting relevant information with the utmost respect for privacy. By adhering to this principle, we safeguard personal information while fulfilling our obligations and delivering reliable insurance services to our valued customers and contractors.

### **Principle 5 - Use, Disclosure, Retention:**

**Requirement:** Responsible use, disclosure and retention

#### **How we safeguard your information integrity?**

At MyLegacy Insurance Services, we adhere to the principle of using and disclosing personal information solely for the purpose for which it was collected, unless consent is obtained or authorized by the Act. We also prioritize retaining personal information only as long as necessary to fulfill the stated purposes.

Our collection, use and retention of personal information from individuals align with the functions and services outlined in our Privacy Policy. To ensure compliance with record retention requirements, we rely on insurers to inform us of their specific guidelines for retaining customer information.

When personal information is utilized in making decisions about individuals, we retain it for an appropriate duration, allowing individuals access to the information after the decision has been made. Personal information that no longer serves its intended purpose is securely and responsibly destroyed, ensuring the integrity and protection of sensitive data.

By adhering to these practices, we uphold the principles of data usage, disclosure and retention, safeguarding personal information and respecting the privacy rights of our customers and contractors.

## **Principle 6 - Accuracy:**

**Requirement:** Maintaining data accuracy

### **How we promote informed decision-making?**

At MyLegacy Insurance Services, we recognize the importance of maintaining accurate and up-to-date personal information. We strive to minimize the possibility of using incorrect information when making decisions about individuals or disclosing information to third parties, as required by this principle.

To achieve this, we adopt a comprehensive approach based on the specific use and interests of the individual. The extent to which personal information is updated will depend on the purpose for which it is used, taking into account the individual's best interests. We ensure that personal information is sufficiently accurate, complete and up-to-date, reducing the risk of inappropriate information being used for decision-making.

As part of our commitment to accuracy, we thoroughly vet insurance applications and forms on behalf of insurers. This process allows us to ensure that the information provided to insurers is complete and accurate, promoting informed decision-making and enhancing the overall integrity of the insurance process.

While routine updates to personal information are not conducted unless necessary to fulfill the purposes for which the information was collected, we actively encourage individuals to inform us of any changes or corrections to their personal information. This helps us maintain accurate records and better serve our customers and contractors.

By prioritizing accuracy, we strive to uphold the highest standards in our data handling practices, empowering individuals with confidence in the integrity and reliability of their personal information within our organization.

## **Principle 7 - Safeguards:**

**Requirement:** Ensuring information security

### **How we safeguard your confidentiality and integrity of data?**

At MyLegacy Insurance Services, we place a paramount emphasis on safeguarding personal information against unauthorized access, disclosure, copying, use, loss or theft, in accordance with the requirements set forth in this principle.

To achieve this, we have implemented robust security safeguards and comprehensive training programs throughout MyLegacy Insurance Services. These measures are designed to protect personal information from potential risks and vulnerabilities. The specific safeguards employed may vary depending on the nature and format of the collected information.

Our security safeguards encompass a combination of physical organizational and technological measures. These measures aim to restrict access to authorized individuals, ensuring the integrity and confidentiality of personal information while protecting it from unauthorized use or disclosure. We take proactive steps to ensure that any third parties with whom we contract and who may handle personal information, have implemented comparable security measures.

By implementing these safeguards, we strive to create a secure environment that instills confidence in the confidentiality and integrity of personal information. We remain dedicated to upholding stringent security standards and continuously evaluate and



# POLICIES AND PROCEDURES (PIPEDA)

enhance our security practices to adapt to evolving threats and technological advancements.

## **Principle 8 - Openness:**

**Requirement:** Commitment to transparency

### **How we keep our privacy policies and procedures accessible?**

At MyLegacy Insurance Services, we are committed to promoting openness and transparency regarding our privacy policies and procedures, as mandated by this principle. We strive to ensure that our privacy practices are easily understandable and readily available to our contractors and stakeholders.

To fulfill this requirement, we provide our comprehensive Privacy Policy to our contractors and make it easily accessible on our website. Our Privacy Policy serves as a valuable resource, outlining our commitment to protecting personal information and explaining how we handle and safeguard it. It covers important aspects such as information collection, use, disclosure, retention and individuals' rights.

In addition to the readily available online version, we also provide our Privacy Policy upon request, ensuring that individuals have easy access to the information they seek. We believe in proactive communication and are dedicated to addressing any inquiries or concerns regarding our privacy practices.

For a more detailed list of the specific safeguards we employ to protect private information, please refer to Appendix A, which provides additional information on the security measures and controls we have implemented. By promoting openness and making our privacy policies and procedures easily accessible, we aim to foster trust, empower informed decision-making and demonstrate our commitment to protecting the privacy and confidentiality of personal information.

## Principle 9 - Individual Access:

**Requirement:** Enabling individual access

### How we empower your control and accountability?

At MyLegacy Insurance Services, we prioritize the rights of individuals to access their personal information, as mandated by this principle. We are committed to providing individuals with the necessary information and access to their personal data while enabling them to exercise control over its accuracy and completeness.

Upon receiving a request, MyLegacy Insurance Services will promptly inform the individual whether we hold any personal information about them. We will grant individuals access to their personal information, along with an account of its use and disclosure. We strive to respond to all access requests within a reasonable timeframe, ensuring that individuals can obtain the information they seek.

Our commitment to individual access extends to facilitating the correction or amendment of personal information if inaccuracies or incompleteness are identified. We provide individuals with the ability to challenge the accuracy of their personal information and request appropriate changes as needed.

We aim to make the process of accessing personal information as straightforward as possible, without imposing any unnecessary costs. Our goal is to empower individuals by granting them meaningful control over their personal data.

For more information on the specific procedures and guidelines for accessing personal information, please refer to Appendix B, which provides further details on the access request process. By facilitating individual access and fostering transparency, we demonstrate our commitment to accountability, privacy rights and ensuring that individuals have the necessary tools to maintain the accuracy and integrity of their personal information.

## Principle 10 - Provide Recourse:

**Requirement:** Ensuring recourse and resolution

### How we empower complaint handling?

At MyLegacy Insurance Services, we are committed to providing individuals with clear information about the available avenues of recourse when it comes to privacy-related concerns. We understand the importance of addressing complaints and providing individuals with appropriate channels for resolution.

MyLegacy Insurance Services takes responsibility for informing individuals who inquire or lodge complaints about the applicable complaint handling protocol in place. We ensure that individuals are aware of the internal processes and procedures we have established to address privacy-related concerns.

We are dedicated to investigating and responding to all complaints in accordance with the relevant departmental complaint handling protocol. If a complaint is found to be justified, we will take appropriate measures to address and rectify the situation. This may include amending our policies or practices as necessary to prevent similar issues in the future.

In addition to our internal complaint handling procedures, we inform individuals about other available avenues of recourse. This includes directing them to industry associations, regulatory bodies and the Office of the Privacy Commissioner of Canada. By providing individuals with this information, we empower them to seek resolution through external entities if they deem it necessary.

For detailed information on the recourse options available, please refer to Appendix C, which provides additional guidance on the avenues for complaints and dispute resolution. By ensuring transparency and providing effective recourse mechanisms, we demonstrate our commitment to accountability, addressing concerns



## POLICIES AND PROCEDURES (PIPEDA)

and continuously improving our privacy practices to better serve our valued customers and stakeholders.

**Contact Us:** If you have any questions or concerns regarding this Policy or the management of your personal information, please reach out to our Privacy Compliance Officer. To ensure a timely and effective response, we kindly request that complaints be submitted in writing via email.

Privacy Compliance Department

Name: Privacy Compliance Officer

Address: 7050 Telford Way, Unit 200, Mississauga, ON L5S 1V7

Phone: +1(905) 960-4444

Fax: (416) 214-4333

Email: [compliance@mylegacyinsuranceservices.com](mailto:compliance@mylegacyinsuranceservices.com)

We value your privacy and are committed to addressing any inquiries or concerns you may have. Our Privacy Compliance Officer is dedicated to providing assistance and resolving any privacy-related matters in a professional and timely manner. Please use the provided contact information to get in touch with us.

## Appendix A - Safeguarding Personal Information

### Ensuring Robust Security Measures: Protecting the Privacy of Personal Information

At MyLegacy Insurance Services, safeguarding personal information is a critical aspect of our privacy efforts, recognizing the sensitive nature of the information we collect, use and retain. To ensure the protection of personal information from potential risks such as loss, theft and inadvertent destruction, we have implemented appropriate safeguards. Personal information owned by our contractors, employees and customers is maintained in both paper and electronic formats within our offices.

To safeguard personal information, we have established various controls and measures:

#### Physical Safeguards:

- Our premises are secured using locks and fire suppression systems to maintain a secure environment.
- Paper files containing personal information are stored in locked file cabinets to restrict unauthorized access.
- Reception areas and other relevant areas are regulated to enhance security measures.

#### Operational Safeguards:

- We maintain a clean desk policy to minimize the risk of unauthorized access or disclosure of personal information.
- Policies and procedures regarding information security are in place to guide our employees in maintaining the confidentiality and integrity of personal information.
- We follow record retention and destruction schedules in accordance with insurers' records retention policies, ensuring compliance with applicable regulations.



- Personal information is strictly prohibited from being removed from our offices to mitigate the risk of unauthorized disclosure.
- Staff members receive comprehensive training on information security protocols and the importance of safeguarding personal information.
- Access to personal information is granted on a need-to-know basis, aligning with the roles and responsibilities performed within the AGA/MGA.
- We regularly back up our electronic records to ensure data integrity and provide secure storage for these backups.

By implementing these robust safeguards, we prioritize the privacy and security of personal information entrusted to us. Our commitment to maintaining confidentiality and protecting against potential threats is reflected in the comprehensive measures we have put in place. We continually evaluate and enhance our security practices to adapt to emerging risks and technological advancements, ensuring the ongoing protection of personal information.

### **Technological safeguards:**

- **Virus Scanning:** Our systems are programmed to perform regular virus scans to detect and mitigate any potential threats.
- **Encryption:** We utilize encryption for the secure transmission of all sensitive information through electronic means, ensuring data confidentiality.
- **Secure Faxing:** Rules are in place for the use of faxes and our fax equipment is securely housed in a protected location away from public view, minimizing the risk of unauthorized access to sensitive information.
- **Password Protection:** We enforce the use of passwords on our systems to restrict unauthorized access and enhance data security.

## Assessing the Program:

To ensure the ongoing effectiveness of our privacy program, we conduct regular assessments of our controls. These assessments occur as frequently as necessary, but at a minimum, every two years. A comprehensive gap analysis is prepared, which identifies any identified weaknesses and includes a management action plan with a timetable for resolution.

## Training:

We understand the importance of well-informed staff who can confidently address privacy-related matters. As recommended by the Office of the Privacy Commissioner of Canada (OPCC), we provide comprehensive training to our frontline and management staff. This training equips them with the knowledge and skills to address various privacy-related inquiries and situations effectively.

Our training program covers key topics, including:

- Responding to public inquiries regarding our AGA's/MGA's privacy policies.
- Understanding consent and the appropriate methods and timing for obtaining it.
- Recognizing and handling requests for access to personal information.
- Referring complaints about privacy matters to the relevant parties.
- Staying informed about ongoing activities and new initiatives relating to the protection of personal information within our AGA/MGA.

In addition to our internal training efforts, our insurance company suppliers regularly provide training sessions to our staff and contractors, ensuring they stay updated on privacy issues and best practices.

By consistently reinforcing our technological safeguards and investing in staff training, we demonstrate our commitment to upholding the highest standards of data



## POLICIES AND PROCEDURES (PIPEDA)

protection. These measures contribute to the overall security of personal information and reinforce the trust our stakeholders place in us.



## Appendix B - Receiving and Processing Access Requests

### Establishing Clear Procedures: Ensuring Efficient Handling of Access Requests

At MyLegacy Insurance Services, we recognize the importance of providing individuals with access to their personal information as mandated by privacy regulations. To facilitate the handling of access requests, we have established clear procedures to ensure a smooth and efficient process.

When receiving an access request, the following rules and procedures apply:

- **Timely Response:** We aim to respond to a customer's access request within 30 days. In exceptional circumstances, this timeline can be extended for an additional 30 days if it unreasonably interferes with our activities or more time is required for consultations or converting personal information to an alternate format.
- **Notification of Extension:** If an extension is necessary, we will notify the individual within 30 days of receiving the request, informing them of the extension and their right to lodge a complaint with the Office of the Privacy Commissioner of Canada (OPCC).
- **Assisting the Requestor:** We provide assistance to any customer who requires help in preparing their personal information request, ensuring that the process is accessible and understandable.
- **Information Verification:** To account for the existence, use and disclosure of personal information, the individual may be asked to provide sufficient information.
- **Minimal or No Cost:** Access to requested information is provided at minimal or no cost to the individual. Before processing the request, we will notify the individual of any approximate costs involved and request their confirmation to proceed.
- **Clarity and Explanation:** The requested information will be presented in an understandable format, ensuring that acronyms, abbreviations and codes are explained to facilitate comprehension.

- **Amendments to Information:** If any requested information has been amended, we will ensure that relevant third parties, including AGAs/MGAs, receive the updated information.
- **Notification of Refusal:** If an access request is refused, the individual will be informed in writing, outlining the reasons for refusal and any available recourse options.

### Customer Access Requests - Our Procedures:

When we receive a request directly from a customer or through a contractor on behalf of a customer, the following procedures apply:

- **Insurance Company Identification:** We will ask the requestor to name the insurer(s) involved without disclosing any information. Authentication processes cannot be set up as regular contact with customers is not maintained.
- **Avoiding Discussion of Concerns:** We will refrain from discussing any concerns that may have given rise to the request, understanding that unintended conversations can inadvertently lead to the crystallization of a complaint.
- **Contractor Involvement:** If the requestor is a contractor, we will ensure they understand the process and that any personal information collected on behalf of the insurer is not released directly to them.
- **Written Authorization:** Any request made on behalf of someone else, including by the contractor, requires written authorization from the owner of the personal information.
- **Notification and Instruction:** The Privacy Compliance Officer will be notified of the request and will directly contact the contractor and/or insurer's designated contact person, seeking written instructions on how to handle the request. Instructions will include the format requirements, deadlines and other relevant details concerning the personal information in our possession.



## POLICIES AND PROCEDURES (PIPEDA)

- **Contractor or Employee Access Requests:** Access requests made by contractors or employees will be promptly communicated to the Privacy Compliance Officer, who will handle the requests or delegate the responsibility as needed.

By adhering to these procedures, we ensure that access requests are processed efficiently and in accordance with applicable regulations, maintaining the privacy and confidentiality of personal information throughout the entire process.



## Appendix C - Receiving and Responding to Inquiries and Customer Complaints

### Establishing Effective Procedures: Handling Privacy-Related Complaints

At MyLegacy Insurance Services, we prioritize addressing and resolving privacy-related inquiries and customer complaints promptly and effectively. To ensure a consistent and efficient process, we have established the following procedures:

When receiving a privacy-related complaint directly from a customer or through a contractor on behalf of a customer, the following procedures apply:

1. **Insurance Company Identification:** We will not volunteer information about policies or insurers involved. Instead, we will explain to the complainant that the complaint should be directed to the Contractor and/or insurer(s) involved. We will request the requestor to name the insurer(s) to facilitate appropriate handling.
2. **Avoiding Discussions about Complaints:** We will refrain from engaging in discussions with the complainant about the complaint to avoid inadvertently influencing their perception or shaping the complaint. Our goal is to maintain an objective and fair process.
3. **Notification to the Privacy Compliance Officer (PC Officer):** The PC Officer should be promptly notified of the privacy-related complaint. The PC Officer will take the following steps:

**a. Notify the Involved Insurer(s)/Contractor:** The PC Officer will inform the insurer(s)/Contractor involved in the complaint and request written instructions if our assistance is required in providing personal information or resolving the complaint.

**b. Record Keeping and Resolution:** The PC Officer will request that the parties involved in the complaint keep us informed of the progress and decisions made. This enables us to document the outcomes, make any necessary adjustments to our policies and procedures and properly close the complaint in our complaint log.

## Contractor or Employee Inquiries or Complaints:

If an inquiry or complaint is received from a contractor or employee, the following steps should be taken:

1. **Notify the PC Officer:** Any contractor or employee inquiries or complaints should be promptly communicated to the PC Officer.
2. **PC Officer Handling:** The PC Officer will handle all such inquiries or complaints directly or delegate the responsibility as needed, ensuring a consistent and appropriate resolution process.

By adhering to these procedures, we maintain a structured approach to addressing privacy-related inquiries and complaints. Our objective is to provide timely and effective responses, ensure appropriate involvement of insurers/contractors when necessary and continuously improve our policies and procedures based on the outcomes and lessons learned.

