



## **Privacy Policy**

McLarens Canada privacy policy is published on its corporate website. It states as follows: McLarens Canada (McLarens) has been providing claims related outsourcing services to the insurance and risk management industry since 1976. We are committed to the highest ethical standards both as to the accuracy and careful treatment of personal information that comes into our possession as part of the services we render to our clients. McLarens gathers personal information only in connection with claims related and risk management activities and our staff have been trained to treat personal information carefully and with respect.

### ***Why McLarens Collects and Discloses Personal Information***

McLarens collects and discloses personal information to enable our instructing principals to satisfy themselves as to the entitlement of their client to benefits arising from contracts of insurance or under self-insured plans. It also includes collecting and disclosing personal information about third parties with respect to claims made against clients of our principals.

### ***The Kinds of Personal Information McLarens Collects***

The type of information McLarens collects depends upon the type and nature of the claim or risk circumstances. This may include previous claim history, financial, medical health or employment information. We may seek claim validation information from retailers, wholesalers and suppliers of goods and services. In appropriate cases we may also seek information from authorities such as the Ministry of the Environment, Ministry of Labour, Office of the Fire Marshal, Police and Fire Services, Municipalities, Towns and Cities.

### ***How McLarens Obtains Personal Information***

In most cases a significant, if not exclusive portion of personal information is collected directly from the insured or self-insured party, or a third party making a claim against an insured or self-insured party.

Some personal information may be provided by an instructing principal or their agents such as insurance brokers.

Personal information may also be collected from involved parties such as public officials (Fire Department, Police, Office of the Fire Marshal) Witnesses, Private Investigators, Credit Bureaus, Title Searchers and the like. The organizations with which we deal are subject to their own privacy codes and we respect those codes. In some cases McLarens, or those we entrust with specific services, will infer such consent where appropriate. If an instructing principal tells McLarens that they have consent to collect information we will rely on that instructing principals advice. Consent may not be obtained with respect to the collection of certain publicly available information. If information is collected with respect to an investigation involving a suspected breach of an insurance policy (or other agreement) or breach of Canadian law, then consent may not be obtained.

### ***McLarens Disclosure of Personal Information***

McLarens discloses personal information, including to its affiliated companies, only for the reasons listed above or if required to do so by law. The majority of information is disclosed or transferred solely to our instructing principals. However, in order to collect the information required by our principals to provide claim or risk services, we may disclose personal information to third party service providers. This would include (but not limited to) insured's, insurance brokers, insurance adjusters, automobile repair companies, contractors, construction companies, investigators, engineers, accountants, lawyers, and others. We may also disclose personal information to authorities with jurisdiction such as Fire Departments, Fire Marshals, Police and other Federal, Provincial or Municipal authorities for the purposes of verifying the circumstances surrounding a claim. We obtain consent to disclosure when required. Consent may also be inferred where appropriate. If an instructing principal advises us that they have their client's consent to disclose information, we will rely on our instructing principals' advice.

Where McLarens discloses personal information to an approved investigative body (such as the Insurance Crime Prevention Bureau) or when we believe that the information relates to the breach of an insurance policy or other agreement or Canadian law, or where we are required by law to disclose the information, consent may not be obtained. Similarly, if personal information is disclosed to a lawyer for claims purposes or to obtain legal advice, consent may not be obtained.

### ***How McLarens Ensures the Security of Personal Information***

Personal information recorded in documents is securely stored at McLarens offices and its employee's offices in Canada and at offices of McLarens affiliated companies. Electronically recorded information is stored on computer systems maintained by McLarens and McLarens affiliated companies. These computer systems and the information stored in them are protected by electronic security systems.

McLarens and its affiliated companies restrict access to personal information and McLarens employees, contractors and representatives are under obligation to access personal information only when they have a legitimate business need to do so. McLarens employees receive training with respect to proper personal information handling practices and they are under obligation to comply with the privacy laws, this policy and related codes of conduct.

McLarens compliance with appropriate personal information practices and privacy laws is overseen by and is the responsibility of our Privacy Officer.

### ***Accuracy and Access to Personal Information***

McLarens is committed to the accuracy and completeness of its personal information it uses or discloses to its instructing principals.

Upon written request and subject to the following (and any other reasonable conditions which may be necessary) we will provide reasonable access to personal information exclusively to the individual to whom it refers. We will not provide access in any of the following circumstances:

- If doing so would likely reveal personal information about a third party;
- If the information is subject to solicitor-client privilege;
- If revealing the information would reveal confidential commercial information;
- If revealing the information could affect the security of another person;
- If the information relates to the actual or suspected breach of an insurance policy or other agreement or the breach of a Canadian law, or;
- If the information was generated in the course of a formal dispute resolution process;
- Where McLarens is acting as agent for an insurer or other instructing principal where that principal has the responsibility to respond to access to personal information

### ***Amendments***

McLarens may amend this policy from time to time at its discretion. A current version of the privacy policy (which should not be confused with our Internet Privacy Policy) is always available on McLarens main web site "McLarens Privacy Policy".

Please note that the above policy is McLarens Canada's current privacy policy.