

## Our Privacy Commitment to You

SMI is committed to protecting the privacy of the personal information of its customers, which includes insureds, former insureds, applicants, claimants and other individuals involved in a claim. Our customers have trusted us with their insurance needs since 1908, and it is important to us to maintain a high degree of integrity. As of January 1, 2004, the federal Personal Information Protection and Electronic Documents Act (PIPEDA) applies to the operations of insurance companies. PIPEDA, which sets out the rights of the consumer and duties of the company to protect personal information, puts into law the general insurance industry privacy practices that we follow. Our Pledge is to safeguard the privacy rights defined in PIPEDA and all other relevant laws.

### Our Privacy Principles

1. **Accountability:** We have designated an individual, our Secretary/Treasurer, as the person who is accountable for ensuring we use personal information appropriately.
2. **Identifying Purposes:** We will identify the purposes for collecting personal information at or before the time the information is collected.
3. **Consent:** We will only collect, use or disclose your personal information with your knowledge and as accorded by law.
4. **Limiting Collection:** We will only collect personal information that is necessary for the purposes we have identified.
5. **Limiting Use, Disclosure and Retention:** We will not use or disclose personal information for purposes other than those for which it was collected, except with consent or as required by law. Personal information will be retained only as long as necessary for the fulfillment of those purposes.
6. **Accuracy of Information:** Personal information will be as accurate, complete and up-to-date as is necessary for the purposes for which it is to be used.
7. **Safeguards:** Personal information will be protected by security safeguards appropriate to the sensitivity of the information.
8. **Openness:** We will make readily available to individuals specific information about our policies and practices relating to the management of personal information.
9. **Individual Access:** Upon request, an individual will be informed of the existence, use and disclosure of his or her personal information and will be given access to that information. An individual can challenge the accuracy and completeness of the information and have it amended as appropriate.
10. **Challenging Compliance:** An individual can address a challenge concerning compliance with the above principles to our Secretary/Treasurer, who is accountable for our compliance with these principles.

These principles are developed more fully in our Personal Information Protection Policy.

## **Collecting, Using and Disclosing Information About You**

We collect, use and disclose your personal information in order to provide you with the insurance protection that you have requested or in the case of a claimant to provide you with the compensation to which you are entitled. In order to do this, we use your personal information for the purposes of: establishing and maintaining communications with you; underwriting risks on a prudent basis; investigating and paying claims; detecting and preventing fraud; offering and providing products and services to meet your needs; compiling statistics and acting as required or authorized by law (the Identified Purposes).

We take a global view of the Identified Purposes. In other words, we are not collecting personal information just for any one of the purposes, e.g. underwriting your policy. We are collecting the personal information for all of the Identified Purposes, so in effect you can expect that although we may initially use the data for underwriting your policy, we may later use it for claims purposes, and vice versa.

We only collect personal information that we require to provide you with the insurance protection that you have requested and to administer any claims that you may have. The type of personal information that we hold depends upon the type of your dealings with us, but may include: name, address, telephone number, date of birth, family status, marital status, occupation, medical and health records, assets, liabilities, income, credit rating, whether or not credit was extended or refused, credit and payment records, an individual's previous insurance experience including claims history, and an individual's driving record. We only use such information for the Identified Purposes.

Given the nature of the general insurance industry, consent may be implied in some circumstances. For example, we sometimes provide insurance or amendments to existing policies over the telephone, on short notice or with little written documentation. In these circumstances, it is impossible to obtain express written consent from you. Another example is that consent can also be given by you on behalf of another individual. For example, where an individual applies for auto insurance for themselves and their family, the applicant is giving consent for the collection, use and disclosure of personal information both for themselves and their family members even though the family members are not present during the application process. By dealing with us on insurance related matters, we infer that we have your consent for the collection, use and disclosure of personal information necessary for the Identified Purposes.

You may withdraw your consent subject to legal or contractual obligations and on reasonable notice. Withdrawal of consent may limit our ability to provide you with the requested product or service. If you want to withdraw your consent, you should contact the Secretary/Treasurer of Head Office, SMI first to understand the implications of such withdrawal, and then if you choose to proceed, to give the required notice.

## **Protecting Your Privacy**

Your personal information is kept in strict confidence. We maintain physical, electronic and procedural safeguards to protect your information from unauthorized access. We review our policies and practices, monitor our computer networks, test the strength of our security and monitor our compliance with relevant laws in order to help us ensure the safety of your personal information. We restrict access to your personal information to those employees whom we have determined need to know that information to provide products or services to you. In addition, all our employees are bound by a Confidentiality Policy. Personal information is retained only as long as it is needed, or to meet any legal, regulatory or tax requirement.

There are situations specific to the general insurance industry where we will disclose personal information as dictated by prudent insurance practices. For example: As part of the underwriting handling process, we may transfer personal information to other insurance companies including reinsurance companies, which share in the risk. We may disclose personal information to information services for underwriting, claims, classification and rating purposes. We may also disclose personal information to businesses that provide goods and services to insurance companies and their customers, such as claims adjusters, appraisers and repair shops. As well, we may disclose personal information to insurance intermediaries, such as your broker. Only the information necessary for these services will be provided by us to these services providers, and it is done on the basis that they will maintain the confidentiality of the information.

We do not make any personal information available to affiliated organizations, such as subsidiaries, without your consent.

## **Accessing Your Personal Information**

You have a right to submit a written request to access your personal information that is in our possession and make corrections to it. Such a request is to be made to our Secretary/Treasurer at the address listed below. We will respond to your request within 30 days or advise you if additional time is required to respond to your request.

There may be situations in which we are legally prohibited from allowing you access to your personal information. For example, we would be so prohibited if allowing you access to your personal information would likely reveal personal information about another person or other confidential information. If this is the case, we will advise you why, subject to any legal restrictions.

We may also charge you for providing access to personal information, however we will only do so after first advising you of the approximate cost.

We will amend personal information that is demonstrated to be inaccurate or incomplete.

## **Further Information and Contact**

If you have a question or complaint regarding our privacy policies or procedures, you may contact the individual accountable for our personal information protection compliance:

Secretary/Treasurer  
SMI  
279 – 3<sup>rd</sup> Avenue North  
Saskatoon, Saskatchewan  
S7K 2H8

If you make an inquiry or lodge a complaint, and are not satisfied with the outcome of that, you may challenge that outcome by writing a letter to our President, requesting reconsideration of your matter. SMI's commitment is to promptly open a dialogue with you. If your concern remains unresolved to your satisfaction, you may address your concerns to the Privacy Commissioner of Canada, 112 Kent Street, Ottawa, Ontario, K1A 1H3