

## **PRIVACY POLICY: INSURANCE OPERATIONS**

CAA South Central Ontario (“**CAA**,” “we,” “us,” or “our”) and its affiliated companies, including CAA Insurance Company (“**CAA Insurance**”), respect the privacy of your personal information.

This Privacy Policy applies to the personal information that CAA Insurance collects, uses or discloses in the course of providing insurance, both online and offline.

For information on the manner in which CAA collects, uses, discloses and otherwise treats personal information generally in relation to members, please see the general Privacy Policy of CAA South Central Ontario. For our personal information practices specific to our travel business, please see the Privacy Policy for CAA’s affiliated company, CAA Travel (South Central Ontario) Inc.

### ***What is personal information?***

Personal information means information about an identifiable individual.

### ***What personal information does CAA Insurance collect and use?***

If you choose to become a policyholder of CAA Insurance, we may ask you to provide certain personal information, some of which is detailed and sensitive, including, but not limited to:

- Full name and address (both of which must be provided)
- Home, cell and business phone numbers
- Payment information
- Date of birth
- Marital status
- Medical records
- Previous insurance experience, including claims history or accidents, traffic tickets
- Information regarding other drivers of the vehicle, such as date of birth and relationship to insurance policyholder
- Driver’s license number and number of years all drivers have been licensed
- If you participate in our usage-based insurance program, information about driving behavior and vehicle functionality collected through the telematics device installed in your vehicle, including vehicle identification number, time, date, vehicle location (GPS), vehicle diagnostic information, number of kilometers driven, vehicle speed, accelerometer speed, connected/disconnected information and other information collected by analyzing this information.



If you provide CAA Insurance with the personal information of other members of your household, you confirm that you have obtained their consent to our collection, use and disclosure of their personal information for the purposes outlined in this policy. In addition, if you participate in our usage-based insurance program, you are responsible to notify any driver of a vehicle enrolled in the program of the presence of the telematics device in the enrolled vehicle and of the fact that the device will be recording and transmitting collected data to CAA and its service provider.

Details relating specifically to information collected on our website can be found in [Internet Security & Privacy](#) section of this document.

Our products and services are available both to members and non-members. The personal information that we collect in providing these goods or services will vary. CAA Insurance and its affiliates may share your personal information with each other in accordance with this policy. CAA Insurance may also collect your personal information from third parties in accordance with this policy. For instance, CAA Insurance may collect or otherwise verify personal information about you from the Ministry of Transportation (Ontario).

Occasionally, we may send you information about new and existing services and benefits that we offer. In order to offer products and services that are relevant to you and to help us serve you better, we may review and analyze your use of CAA Insurance's products and services. In addition, for the same purposes, we may also collect and analyze information from publicly available demographic data about the jurisdictions in which CAA operates.

CAA Insurance may collect and use your personal information to:

- Process, administer and manage your car, property or travel medical policies;
- Provide requested products or services;
- Better understand your needs and the ways in which we can improve our products and services;
- Establish and maintain communication with you, including [sending you informational emails and alerts, direct mail and telemarketing] and responding to your inquiries;
- Confirm eligibility for a product or service;
- Process payments;
- Meet any legal, regulatory, processing or security requirement that requires collection, use or disclosure of your personal information;
- If you participate in our usage-based insurance program, build up a profile on

how, where and when your vehicle is driven to determine if you are eligible for discounts and for analytics and rate filing purposes with the Financial Services Commission of Ontario;

- Inform you about products and services that we offer that may be relevant to you; and
- Conduct surveys or research for the internal use of CAA South Central Ontario.

### ***How does CAA Insurance disclose personal information?***

We will not disclose, trade, rent, sell or otherwise transfer your personal information, without your consent, except as otherwise set out herein.

Service Providers and Affiliates: CAA Insurance may share your personal information with our affiliates and with our suppliers of goods and services, service providers, representatives, distributors, reinsurers and authorized administrators, which are responsible for administering or providing products and services on our behalf. For example, we may use service providers to authorize and process payments, send e-mail or other communications, run contests, conduct customer research; process information collected through telematics devices or manage and analyze data. Our service providers are only given the information they need to perform their designated functions, and we do not authorize them to use or disclose personal information for their own marketing or other purposes. Moreover, your personal information may be maintained and processed by our affiliates and service providers outside of Canada, including in the United States.

Sale of Business: We may transfer your personal information as an asset in connection with any contemplated or actual sale, merger or other disposal of all or part of our business or assets, or as part of a corporate reorganization or other change in corporate control, including for the purposes of determining whether to proceed with such transaction or fulfilling any records or other reporting requirements to such parties. In such circumstances, we will ensure that any transfer of personal information is subject to reasonable data protection security protocols.

Legal: CAA Insurance, its Canadian, U.S. and other foreign service providers and affiliates may provide your personal information in response to a search warrant or other legally valid inquiry or order, or to an investigative body in the case of a breach of an agreement or contravention of law, or as otherwise required by applicable Canadian, United States or other law. We may also disclose personal information where necessary for the establishment, exercise or defence of legal

claims, to investigate or prevent actual or suspected loss or harm to persons or property, or as otherwise required or permitted by law. If you have installed a telematics device on your vehicle, data collected from the device may be provided to third parties in relation to an accident, investigation and/or other litigation as required by law. For instance, the data may be useful in determining the cause of an automobile accident. If your vehicle is in an accident, we may be under a legal obligation to preserve the data transmitted from the device. This information may be sought by opposing parties in a civil lawsuit or by police when investigating the cause of an accident, or we may be legally obligated to provide such information in response to a subpoena or as otherwise required by law. CAA will not disclose or use the data to resolve any first party claims that you or another driver of your vehicle may file against CAA without first obtaining your prior written consent.

### ***Opting Out***

In the event you withdraw from our usage-based insurance program, CAA will continue to use the data collected from the device for analytics and rate filing purposes with the Financial Services Commission of Ontario. You may opt out of CAA's continuous use of personal information by writing to us at CAA Insurance Company 60 Commerce Valley Drive East, Thornhill, Ontario L3T 7P9 Attention: UBI Coordinator.

If you wish to opt out of or change your communication preferences, please complete an Opt-Out Form and send it back to us. In the event of email communications, you may also click the "unsubscribe" link at the bottom of each of our emails. An Opt-Out Form can be obtained directly on our website at [www.CAASCO.com/privacy](http://www.CAASCO.com/privacy), or by visiting one of our store locations or by calling our toll free number at 1-800-268-3750. Please note that if you unsubscribe from receiving marketing communications, you may still continue to receive transactional or informational messages from us.

### ***How will CAA Insurance protect my personal information?***

Only authorized CAA Insurance employees and agents who need your personal information will have access to it, unless access by others is authorized or permitted by this policy or by applicable law. CAA Insurance takes precautions in an effort to help protect your personal information against loss, theft and unauthorized access, use, alteration, duplication, destruction or disclosure. Such controls include reasonable technological, physical and organizational safeguards, depending on the sensitivity and the format of the information. If you are transmitting personal information electronically, please review the Internet Security & Privacy section of this policy.

CAA Insurance will destroy, erase or render anonymous personal information no

longer required for the stated purposes or for a legal or legitimate business requirement.

***How do I access or correct my personal information, or make inquiries or submit comments to CAA Insurance?***

You have the right to access, update, and correct inaccuracies in your personal information in our custody and control, subject to certain exceptions prescribed by law. If you wish to update or request access to, or correction of, your personal information in CAA Insurance's records, or to make inquiries or complaints, please contact our Chief Privacy Officer in writing at:

CAA South Central Ontario  
60 Commerce Valley Drive  
East Thornhill, Ontario  
L3T 7P9

Fax:(905)771-3101

E-mail:

[privacy@caasco.com](mailto:privacy@caasco.com)

Phone:1-800-268-3750

We may request certain personal information for the purposes of verifying the identity of the individual seeking access to their personal information records. Some information may not be accessed in certain circumstances, for example if it contains personal information of other persons or for other legal reasons. If you are enrolled in any of our usage-based insurance programs, you may access information collected by the telematics device installed in your vehicle via the secure portal or mobile application for your insurance program.

If you have any inquiries or comments regarding this Privacy Policy or CAA Insurance's privacy practices, please write to or contact our Chief Privacy Officer at the same addresses listed above.

***Changes to this Privacy Policy***

CAA Insurance reserves the right to change this Privacy Policy from time to time. If this Privacy Policy changes materially, we will take reasonable measures to notify you, including posting a copy of the revision on our website at [www.CAASCO.com/privacy](http://www.CAASCO.com/privacy). Accordingly, we recommend that you review this Privacy Policy from time to time.



## ***Internet Security & Privacy***

In general, you may visit [www.caasco.com](http://www.caasco.com) without telling us who you are or actively submitting any personal information. However, we collect the IP (Internet Protocol) addresses of all visitors to our Website and other related information such as page requests, browser type, operating system and average time spent on our Website. We use this information to help us understand our Website activity, and to monitor and improve our Website.

To access our services, CAA Insurance requires you to identify yourself. CAA Insurance uses “cookies” to identify you as a registered and/or returning visitor. Cookies are files sent from a website to a visitor's computer which may then be stored on your hard drive so we can recognize you when you return. CAA Insurance uses both session and permanent cookies. These cookies entitle members to enter member exclusive areas of the Website and also to “welcome back” members with pre-established member exclusive privileges. This data may be used for generation of statistics and to personalize future visits or communications. We use cookies, pixels and pixel tracking on the pages of our Website where you are prompted to log in or that are customizable for the collection of aggregate data. If you have registered with our Website, these cookies (1) may let us know who you are, (2) may be necessary to access your account information (stored on our computers) in order to deliver products and personalized services, and (3) will provide us with information that we will use to personalize our Website in accordance with your preferences. You may set your Web browser either to notify you when you receive a cookie or to not accept certain cookies, however, without enabling cookies, you may not be able to take advantage of certain features of the Website.

We also allow service providers and other third-party companies to collect certain information through cookies (such as time and date of website visit and subject of advertisements clicked or scrolled over) when you visit our websites. These companies may use this information to serve tailored ads on our website or other third-party websites. To learn more about online behavioural advertising or to manage your choices for this type of advertising, you can visit [www.youradchoices.ca](http://www.youradchoices.ca).

### ***When you leave our Website***

This policy discloses the privacy practices for our Website. However, our site contains links to other sites that CAA Insurance and its affiliates do not own or operate. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. Once you link to another site, you are subject to the privacy and security policies of the new site. We encourage you to read the privacy policies of

all websites you visit, especially if you share any personal information. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your personal information.

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This Privacy Policy was last revised **April 20, 2018**