



# Respecting your privacy

## 10 fair information principles



### What types of information do we collect and use – and why?

In the course of doing business, we collect and use three types of information: personal, non-personal and anonymous.

**Personal information** – Identifies you specifically. Some examples of personal information are: name, age, income, blood type, medical records, credit history, social insurance number, home email, address and telephone number.

**Non-personal information** – Includes business name, title, address and phone number.

We collect, use and may disclose personal and non-personal information to provide and administer the financial security products and services our clients and business partners ask for any specific purposes will be identified at time of collection.

Empire Life may use third party service providers located outside of Canada to process and store your personal information.

Personal information that is processed or stored outside Canada may be subject to the laws of the jurisdiction outside Canada where the information is processed or stored, which may allow disclosure to courts, law enforcement or other government authorities of that jurisdiction under certain circumstances.

**Anonymous information** – Is general information or information we may collect that doesn't identify you. For example, we may conduct surveys to measure how well we are doing our job or we may use anonymous demographic information from internal and external data sources to develop new products and services. We may also regularly track anonymous traffic patterns through our websites. In all of these cases, we don't collect, use or disclose any identifying information unless you agree to provide it.



## Our commitment to you

At Empire Life, we take privacy and the trust our customers, employees and business partners place in us seriously. We follow 10 principles which set the standards for how we handle your personal information. Everyone at Empire Life follows 10 privacy principles called “fair information principles”.



## 10 fair information principles

### 1. Accountability

Under the guidance of our Chief Privacy Officer, we are responsible for maintaining and protecting the personal information we collect, use and disclose.

### 2. Identifying purposes

We tell you why we need your personal information before or at the time we collect it.

### 3. Consent

We ask for and receive your consent to collect, use or disclose your personal information. The only exceptions would be in cases where use or disclosure is required or permitted by law. For example, a medical emergency or a criminal investigation may constitute an exception.

### 4. Limiting collection

We only collect information necessary for the purposes we identify to you, and only in a fair and lawful way.

### 5. Limiting use, disclosure and retention

We only use the information for the purposes we collect it for, and we destroy the information once it is no longer needed for those purposes.

### 6. Accuracy

We take steps to make sure your personal information is accurate, complete and up-to-date.

### 7. Safeguards

We protect the confidentiality of your personal information with secure storage and procedures, and provide access only to those individuals who need it for its intended purpose.

### 8. Openness

We make information openly available about our privacy policy and practices, through printed material, our websites and our Chief Privacy Officer.

### 9. Individual access

We provide you with access to any personal information of yours we have, tell you how it is being used, stored and disclosed, and give you the opportunity to request that it be amended, if appropriate.

### 10. Challenging Compliance

We are always ready to answer your questions, enquiries or complaints about our privacy principles and practices, and your requests to access your personal information. Please contact our Chief Privacy Officer.



## Integrity & accountability

To us, they're not just the latest corporate buzzwords. Integrity and accountability are values that have guided our business practices since The Empire Life Insurance Company (Empire Life) was founded in 1923.

We're in the business of providing financial security solutions to Canadians and to help us fulfil our mission, we are entrusted with a significant amount of personal and other types of information.



### Chief Privacy Officer

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### Empire Life Corporate Head Office

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Our complete privacy policy and guidelines for personal information access requests are posted on our website at [www.empire.ca/your-personal-information-and-your-privacy](http://www.empire.ca/your-personal-information-and-your-privacy).

> If you would like further information, please contact us using the information listed above.

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### The Empire Life Insurance Company

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