

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. Providing Recourse

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 at:

Chief Privacy Officer

The Empire Life Insurance Company

259 King Street East

Kingston, ON K7L 3A8

Telephone: **(613) 548-1881**

Toll-free: **1 800 561-1268**

Facsimile: **1 800 920-5868**

E-mail: privacy@empire.ca

From time to time we may also provide you with information concerning other Empire Life products and services. If you prefer not to receive such information, simply contact our Chief Privacy Officer.

Where can I find more information about the Empire Life privacy policy and practices?

Our complete privacy policy and guidelines for personal information access requests are posted on our website at www.empire.ca.

If you would like further information, please contact us in writing or by phone or e-mail, using the information listed above.

The Empire Life Insurance Company (Empire Life) offers competitive individual and group life and health insurance, investment and retirement products to help you build wealth and protect your financial security.

Empire Life is among the top 10 life insurance companies in Canada¹ and is rated A (Excellent) by A.M. Best Company². Our vision is to be the leading, independently-owned, Canadian financial services company committed to simplicity, being easy to do business with and having a personal touch.

¹ Source: Office of the Superintendent of Financial Institutions (OSFI) and company annual reports, based on general and segregated fund assets

² As at June 29, 2012

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Empire Life Corporate Head Office

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RESPECTING YOUR PRIVACY

10 privacy principles



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.



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 e-mail, address and telephone number.

Non-personal information includes business names, titles, addresses and phone numbers.

At Empire Life, we collect and use personal and non-personal information to deliver the financial security products and services our clients and business partners ask for.

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

Anonymous information

In addition to personal and non-personal information, we also collect and use anonymous information. For example, we may conduct surveys to measure how well we are doing our job or we may use non-identifying demographic information from internal and external data sources to develop new products and services to respond to market needs. In addition, and for both of the reasons mentioned above, we regularly track anonymous traffic patterns through our websites. In all of these cases, we don't collect and use any identifying information about you unless you agree to provide it.

Our commitment to you

At Empire Life, we have always been very sensitive to privacy issues and to the ongoing trust our clients, employees and business partners place in us. In respect of your privacy, everyone at Empire Life follows **10 privacy principles.** These principles set standards for how we handle your personal information.

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 purpose we collect it for, and we destroy the information once it is no longer needed for that purpose.

6. Accuracy

We take steps to make sure your 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.