



## ***Our Privacy Policy***

CGI Adjusters Inc. has been providing claims related outsourcing services to the insurance and risk management industry since 1951<sup>1</sup>.

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. We gather personal information only in connection with claims related risk management activities and our staff have been trained to treat personal information carefully and with respect.

### **WHY WE COLLECT AND DISCLOSE PERSONAL INFORMATION**

We collect and disclose 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 KIND OF PERSONAL INFORMATION WE COLLECT**

The type of information we collect 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 Environment, Ministry of Labour, Office of the Fire Marshal, Police and Fire Services, Municipalities, Towns and Cities.

### **HOW WE OBTAIN PERSONAL INFORMATION**

In most cases, a significant portion, if not the entirety 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, we, or those we entrust with specific services, will infer such consent where appropriate. If an instructing principal tells us that they have consent to collect information, we will rely on that instructing principal's advice.

Consent is not required 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 a Canadian law, then consent is not required.

### **OUR DISCLOSURE OF PERSONAL INFORMATION**

We disclose personal information, including to our 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 by 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 be limited to) insurers, 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 principal's advice.

Where we disclose 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 is not required. Similarly, if personal information is disclosed to a lawyer for claims purposes or to obtain legal advice, consent is not required.

## HOW WE ENSURE THE SECURITY OF PERSONAL INFORMATION

Personal information recorded in documents is securely stored at our offices and our employees' offices in Canada and at offices of our affiliated companies. Electronically recorded information is stored on computer systems maintained by CGI Adjusters Inc. and its affiliated companies. These computer systems, and the information stored in them, are protected by electronic security systems.

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

We are committed to the accuracy and completeness of the personal information we use or disclose to our 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;
- if the information was generated in the course of a formal dispute resolution process;
- if we are acting as agent for an insurer or other instructing principal where that principal has the responsibility to respond to request for access to personal information.

## AMENDMENTS

CGI Adjusters Inc. may amend this policy from time to time at its discretion. A current version of this privacy policy is always available on CGI Adjusters Inc. main web site ([www.uab.ca](http://www.uab.ca)).

## FURTHER INFORMATION

Request for further information, personal information access or complaints about CGI Adjusters Inc.'s handling of personal information should be referred to our local Privacy Officer, namely the Branch Manager / Director of our closest office located anywhere in Canada. Also, our Regional Privacy Officers can be reached as follows:

	Telephone No.
Atlantic Region:	(902) 423-9287
Quebec Region:	(514) 735-3561
Ontario Region:	(905) 474-0003
Western Canada Region:	(403) 296-1300

Our National Privacy Officer can be reached at the following telephone no.: (905) 474-0003

## This Privacy Policy is also available in French.

Revision Date: 2003/12/01

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<sup>1</sup> From 1951 to 2003, our company was known under the name of *Underwriters Adjustment Bureau Ltd.*

