



Privacy Statement and Consent

Our Commitment to our insurance suppliers and our customers:

To provide customers with access to insurance products and services, we collect certain personal information about them. Our commitment goes beyond meeting legal requirements for protecting personal information. The trust and confidence that our customers and insurers hold in me, including our ability to protect the confidentiality of personal information and the privacy of the individuals who provide it, are critical to our success. This Policy applies to our employees and any third-party service providers or representatives with which We do business. We also adhere to the Canadian Anti-Spam Legislation and Regulations and will only communicate electronically with your permission.

Why We collect, use, and retain personal information:

We act as an intermediary between you and the insurance companies with which We hold contracts to promote their products and services. When We collect information in order to assess your insurance needs and provide advice, we do so with your explicit consent. In order to place an insurance application with any insurer, we are required to obtain certain essential personal information about you on behalf of the insurer and under the consent that the insurer obtains from you on the application. Your application is provided to The Gryphin Advantage, a Managing General Agent (MGA), which provides administrative services to both me and the insurer, under a contractual arrangement. The MGA's and our own privacy policies, practices and safeguards must meet the standards that insurers establish in their own privacy policies. Your information is used to determine insurance risk, assess eligibility for products, to administer those products once purchased and to fulfill certain regulatory requirements. This can include health information, financial information and history and information about avocations. The MGA, insurer and We retain some of this information in order to be able to administer business, to provide ongoing service to you and when We are required to do so by law.

We may use anonymous data to manage our business, to identify products and services that might benefit you and to prepare reports about our business.

Limiting collection:

We collect only the information We need to fulfill our contracts with you, the MGA and the insurer and to meet our regulatory obligations. We will use only fair and lawful means to collect this information. We will collect information only with consent.

How We collect customers' information:

We collect your personal information, including health information, directly from you.

Consent:

The customer consent that insurers receive includes consent to provide personal information to me and generally to the MGA, which allows us both to fulfill our contractual obligations to the insurer. The MGA and We also operate under the customer consent that We receive at the outset of our relationship. When you request or use any of the products or services, we make available, we will transfer whatever information is necessary by implied consent. If We receive notice from you or an insurer that you have



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withdrawn consent for the continued use and retention of personal information, we will take whatever steps are necessary to adhere to the Act. This may require termination of our relationship. We will act on whatever instructions We receive from the insurer regarding your status.

Limits on use and disclosure:

We will use and disclose personal information to perform our contractual duties, to provide you with information and when We am required to do so by law. We may disclose this personal information to our employees or service providers, including Managing General Agents, so that they can perform their duties, to insurers and any person or organization to which consent has been given and where authorized by law. Where personal information is provided to service providers, insurers and We require them to protect that information consistent with our policies and practices.

We may also use personal information to offer products and services that We believe will interest you but We will never give or sell personal information to third parties for marketing purposes.

Limits on retention of information:

We will retain personal information in our records only as long as it is needed for the purposes identified, or as legally required or permitted.

Accuracy of information:

We are responsible to the insurer for keeping your personal information as accurate and up-to-date as possible. The insurer is responsible for providing me with any notices of changes that you provide to them directly. You may challenge the completeness and accuracy of your personal information that We hold. We will make any necessary corrections to information that is shown to be incomplete or inaccurate and will notify any third parties, including insurers and MGAs, if We make such corrections. Any disagreement or discrepancy regarding accuracy will be documented.

You may gain access to your personal information we hold under the consent you provided to me by making an access request to me. If you wish to request access to information that We collected on behalf of the insurer, you may make the request through us, but we may be asked to direct you to the insurer.

Protecting personal information:

We will protect personal information from unauthorized access or use by ensuring that safeguards are in place, including physical security measures for our office location, operational policies, procedures and access protocols and technological measures for our computer systems. We will use safeguards to prevent unauthorized access to personal information during the destruction process.

Contact Us:

If you have any questions or concerns regarding this Policy or how we manage your personal information, please contact us at info@alfordfincial.ca.