

# Privacy

## Privacy Statement

### PERSONAL INFORMATION PROTECTION & ELECTRONIC DOCUMENTS ACT (PIPEDA) CUSTOMER PRIVACY STATEMENT

#### **1. Commitment To Privacy**

At McLennan & Company, we are committed to protecting the privacy of our client files (client refers to debtors and creditors). This Privacy Statement provides you with details regarding why we collect personal information, what we do with that information, the steps we take to ensure that access to that information is secure, how you can access personal information pertaining to you and who you should contact if you have any questions or concerns about our policies or practices.

Since we regularly review our policies and practices, we may revise our Privacy Statement at any time; however, any changes or additions to Section 4. regarding the reasons we use personal information will not apply to you unless you consent to them. We will inform you that changes have been made by indicating at the top of the Privacy Statement, the date that it was last updated. Copies of our Privacy Statement can be obtained from our office and will be posted on our website at [www.mclennanandcompany.com](http://www.mclennanandcompany.com). We encourage you to review our Privacy Statement to be sure that you understand how information that you provide will be used.

#### **2. What Is Personal Information?**

In the Personal Information Protection and Electronic Documents Act, personal information is defined as information that would allow a specific individual to be identified or information that can be directly associated with an individual. For example, this includes your name, postal or e-mail address, telephone number, social insurance number, demographic information and purchasing history.

#### **3. When We Collect Personal Information**

We only collect such personal information as is strictly necessary for the purposes outlined in Section 4. We collect personal information when (1) you request our products or services (including information about your credit history); (2) when you move or request changes to products or services; (3) when you interact with us by telephone, mail, fax, e-mail or in person; (4) when you participate in any of our programs or promotions; (5) or when you purchase any products from us.

#### **4. How We Use Personal Information**

As part of our business operations, we hold and use certain personal information pertaining to you in order to process your requests, provide you with service, to tell you about opportunities or changes that we think may impact you. Specifically, we may use personal information for the following purposes:

- Verify your identity;
- Process your requests for products or services;
- Assess and update your creditworthiness, as required;
- Provide you with services including billing and collection for those services;
- Protect all parties from error and fraud;
- Comply with legal and regulatory requirements

Personal Information may be collected, used or disclosed for any of the above "Identified Purposes". If your personal information is not needed for one of the "Identified Purposes", we will not use or disclose it without obtaining additional consent from you.

#### **5. When We Share Personal Information**

In limited circumstances we share personal information with other parties, for one principal reason: To administer the delivery of products and services to you. We may share personal information with the following entities: credit bureaus; data storage and exchange providers; software providers; data and payment processors; cheque printers; claims processors; professional firms or consultants (ie: legal firms, engineers); collection agencies; statement producers; mailing houses (ie: to mail you newsletters or promotions, or to provide any necessary communications); third party suppliers (we interact with a number of third parties to provide our complement of products and services). In these circumstances the personal information that the non-related organization receives is limited to only the personal information held by us that they need in order to render their service to us.

We will disclose personal information if a law, regulation, search warrant, subpoena or court order legally authorizes or requires us to do so to protect the rights, property or personal safety of McLennan & Company, its clients, employees or other members of the public. Except as set out, we do not share or disclose the personal information we hold to others.

#### **6. How Long Do We Hold Personal Information**

Personal information is retained only for so long as is necessary for the purposes set out above. When no longer required, we will destroy, erase, or de-personalize the personal information. Federal or Provincial Legislation or Legal requirements may necessitate our retaining some or all of the personal information for a period of time that is longer than we might otherwise hold it.

#### **7. Accuracy**

To ensure that the personal information you provided is accurate, complete and up to

date, we urge you to provide us with updates regarding such information and to inform us of any errors affecting the personal information we hold.

### **8. Security Measures**

We will continue to keep in place security measures in an effort to protect personal information held by us from unauthorized use, access, disclosure, distribution, loss or alteration. We employ physical, administrative, contractual and technological safeguards to appropriately protect personal information held by us in the most effective manner possible.

### **9. Accessing Personal Information**

You may review your personal information. If you believe our information needs corrected, please let us know and we will try to amend our files as quickly as possible. In response to a formal request, our goal is to respond to your concerns within thirty (30) days of receipt of your written request. If we cannot meet that timeline we will contact you and explain the reason for the delay.

### **10. Complaint Process**

If you are not satisfied or wish to submit comments concerning our Privacy Statement or its application by us, we invite you to convey your concerns or suggestions to McLennan & Company Ltd., 289 Dufferin Avenue, London, Ontario N6B 1Z1 Attention: Chief Privacy Officer. We will reply as quickly as possible and inform you of the steps, if any, that have been or will be taken in order to address the concern or implement the suggestion.

To learn more about the Federal Privacy Act:  
Privacy Commission of Canada  
Toll Free: 1-800-282-1376  
Website: [www.priv.gc.ca](http://www.priv.gc.ca)

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