

This policy was last updated: September 2023

### **What's New**

We have recently updated our Canadian privacy policy to:

- Further clarify how we collect, use, disclose and retain personal information
- Provide additional information on crossborder transfers of personal information

### **Introduction**

The Independent Order of Foresters and its subsidiaries and affiliates (collectively Foresters) maintain the privacy and security of individuals' personal information while collecting, using and disclosing personal information. We support the rights of individuals or their authorized representatives to access, correct or delete their personal information in our control, as required by applicable laws. We will not collect, use, disclose or retain personal information except as described to you in this privacy policy, where you provide your consent, or where we are otherwise permitted by law to do so. Personal information is information about you or that relates to you and that can identify you, as set out in Canadian privacy laws.

This Privacy Policy applies to all of our operations in Canada, unless we have provided you with a separate privacy statement for a particular service or activity.

This privacy policy is divided into different sections, and you can click through each section listed below.

1. Your Consent
2. Information We Collect
3. Online Privacy
4. Why Do We Collect your Information and How Do We Use It
5. When Do We Disclose Your Personal Information and to Whom
6. Limiting Use, Disclosure and Retention
7. Crossborder Transfers
8. How Long Do We Use and Retain Your Personal Information For
9. How Do We Protect Your Information
10. Your Rights and Choices
11. Complaints
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## 1. Your consent

We collect, use and share your personal information only for disclosed purposes related to the products, services and fraternal benefits we offer, and only with your consent or as permitted or required by law. Your consent may be expressed in writing, or it may be given verbally, electronically, or through our or your authorized representative(s). Depending on the circumstances and the sensitivity of the personal information, where it is appropriate to do so your consent may also be implied or inferred. You may withhold or withdraw your consent for us to collect, use and disclose your Personal Information, subject to legal or contractual reasons preventing you from doing so. Depending on the circumstances, however, withdrawal of your consent may impact our ability to continue to provide you with the insurance services and fraternal benefits you have requested.

If you provide personal information about another individual to us, it is your responsibility to obtain the consent of that individual to enable us to collect, use and disclose his or her information as described in this Privacy Policy.

## 2. Information we collect

We generally collect your personal information when you submit an application, when you provide it to an insurance advisor, or when you provide it through other electronic or paper means, and from your transactions and other interactions with us. This information may include the following personal information:

- Identity information, such as your name, address, email address, telephone number, date of birth, government identification such as passport number, driver license, social insurance number or citizenship.
- Financial information, such as your income and banking information, and which may also include payment information.
- Health related information, such as health and medical information or information about your lifestyle and habits.
- Information about your interactions with us, such as when you visit our websites, applications, social media sites or when you call our service centers, or through other methods of communications.
- Biometric data, such as your voiceprint, should you choose this option when you call us.

We collect your personal information in the following ways:

**Directly from you:** We collect personal information from you, either by mail, telephone, email, online, or through applications and other forms that you submit to us, such as when you apply for insurance or file a claim, or when you decide to open and register a member account on our website.

**Indirectly from you:** We collect personal information when you use our products and services, from your transactions with us or others, and when you use or interact with our websites or social media sites. For example, we may use cookies and other similar technologies, to collect information such as online identifiers including location data, your Internet Protocol (IP) Address, device or browser type, or information about how long you used the website and pages visited. For more details on the use of such technologies and as to the means to activate them, please read our [Cookies Policy](#).

**From third parties and other sources:** During the normal course of our business, we may, from time to time, collect information from third parties such as your insurance advisor, consumer reporting agencies, other service providers who process or administer products or services requested by you, and from health care providers, clinics, and other insurance companies. We may also collect information from the Medical Information Bureau or other persons that have records about you or your health.

These third parties from whom we obtain information collect information and disclose it to other persons pursuant to their own privacy policies and practices.

We may collect, use and disclose de-identified information, which can include statistical or demographic data, to help us support and improve our business purposes indicated below. De-identified information may be derived from your personal information but does not directly identify you. In addition, we may also collect, use and share anonymized information. For example, we may aggregate your usage information on our website, de-identify it, and then combine it with other users' usage information, to understand the number or frequency of users clicking or using a specific website feature or making specific requests or inquiries. This allows us to determine if we are efficiently using our resources to serve you. Should the need arise for us to combine the anonymized information with your personal information, we treat the combined information as personal information and use it in accordance with privacy laws.

### **3. Online privacy**

Foresters understands that you care about how we collect, use, disclose and retain information when you interact with us online through our websites, online services and applications (collectively "Sites") and through social media platforms.

Some of our Sites may collect your personal information and use online data analytics tools or cookies. We use these technologies to improve functionality, enhance security, evaluate the effectiveness of our Sites and advertising campaigns, or to improve your online experience.

Our Online Privacy Statement explains the types of personal information we collect through our Sites, how we use and protect that information, and the choices you have regarding our collection, use and sharing practices. You can also learn more about how we use cookies and other similar technologies, as well as on the means to activate them, in our Cookies Policy.

[View our Online Privacy Policy](#)

### **4. Why do we collect your information and how do we use it?**

The primary purpose we collect your personal information is so that we may offer and deliver the products and services that you request and that are suited to your needs. We use your personal information to:

- Assess your initial and continued eligibility for our products and services
- Market and administer our products and services
- Administer, manage and communicate with you about your and our products and services
- Investigate and pay claims and to process transactions
- Respond to your inquiries, customer support requests or complaints
- Identify and mitigate potential losses to you and/or Foresters, for example to verify your identity, to detect, prevent, or investigate fraud or security breaches, and to suppress financial abuse
- Hold and inform you of fraternal and community events and activities and operate our branch system
- Manage our risks and operations, to help us operate and improve our business, to assess, develop and offer other products, processes and services, as well as to minimize any disruption to our business.
- Conduct business analysis, research and data analytics, including actuarial studies, and conduct or participate in industry or market research.

- Support and optimize the user experience on our websites and to develop and improve our products and services
- Fulfill our regulatory legal, financial and other regulatory reporting and audit obligations, as well as to exercise and protect our legal interests.
- As otherwise required or permitted by law.

We do not sell personal information.

## **5. When Do We Disclose Your Personal Information and to Whom?**

In addition to the purposes identified above, we may also use and disclose your personal information as otherwise permitted or required by law, such as but not limited to:

- With other third parties, including third party service providers, for them to improve their products offerings to Foresters, as well as their business development, for example, to build performance, customer demographic and behavioral insights. This could also include benchmarking and market forecasting studies, or improving our data analytics capabilities or risk assessments methodologies.
- To comply with applicable legislation or regulation, or to respond to a subpoena, a court order, or to valid information requests from regulatory authorities
- To third parties, to help us prevent and detect fraud and suppress financial abuse, as permitted by law
- With Foresters employees, as required to fulfill their accountabilities. All Foresters employees are required to maintain the confidentiality of your personal information, and unauthorized disclosure or access is prohibited.
- With independent agents or insurance brokers offering, advising you on, or servicing you with Foresters' products or services. Please contact your agent or broker for further details on their own privacy policies and practices.

## **6. Limiting use, disclosure and retention**

The disclosure of and access to your personal information will be restricted to those who have a need for, or the legal right to, the information.

Some of our business areas, subsidiaries or affiliates may, from time to time, offer or promote other financial products, benefits or services, or those of select third parties, that we believe may be of interest to you. We may also have joint marketing or distribution agreements with other financial institutions that may offer or promote products that we believe may be of interest to you. We will not disclose your personal information, without your consent, with any third parties for the purpose of that organization marketing their own products or services directly to you. We may disclose your personal information to insurance agents and agencies for the purposes of those agents to process or administer products or services requested by you.

As indicated above, we may also share your personal information with different categories of service providers (including our subsidiaries, affiliates, reinsurers, and third-party service providers), or with independent insurance agents and agencies, including to process or administer products or services requested by you and for marketing purposes. These categories include the following:

- Email and other internal operations or communications providers
- Systems administration providers
- Website operators
- Payment card processors

- Telephone and technical support providers
- Printing, and mailing distribution providers
- Data hosting, data storage, data processing and client relationship management service providers
- Research and analytics providers
- Professional advisors providing legal, consultancy, banking, insurance, audit and accounting services
- Tax, regulatory and other authorities as required; and
- Other third parties as required or permitted by law

Our service providers are provided with the information necessary for them to perform the services requested, and they may have to process personal information to do so. They must comply with applicable laws and regulations, including privacy laws, and we require them to protect the information in accordance with our privacy policies and security practices.

We will not share your personal information, without your consent, with any non-Foresters organization for the purpose of that organization marketing their own products or services directly to you.

Additionally, we may use and disclose your personal information when we believe such use or disclosure is permitted, necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country of residence; (d) to enforce the terms of the agreements for our services; (e) to protect our rights, operations or property; (f) to allow us to pursue available remedies or limit the damages that we may sustain. In addition, we may transfer your personal information and other information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, brands, affiliates, subsidiaries or other assets, or other business transaction.

Marketing and Advertisement Materials: You may contact us at [privacy@foresters.com](mailto:privacy@foresters.com) or call us at 1 (800)-828-1540 should you no longer want to receive promotional materials from us. You may also wish to read our [Cookie Policy](#).

## **7. Crossborder Transfers**

Foresters and its subsidiaries, and their respective employees, advisors, service providers, representatives, reinsurers and any of their service providers may be located in other jurisdictions outside of Quebec or Canada. Your Personal information may then be transferred, stored or processed in those other jurisdictions, and may be subject and bound to their privacy and data protection laws. All such persons are required to protect the confidentiality of your personal information, and all such personal information processing and storage activities are to be done in a manner that is consistent with our privacy policies and practices, in compliance with applicable law.

Should your personal information be transferred to another jurisdiction, we will take reasonably appropriate physical, electronic and administrative measures, controls and safeguards to protect your privacy.

## **8. How Long Do We Use and Retain Your Personal Information For?**

We only retain your personal information, in physical or digital format, for as long as necessary to fulfil the applicable purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, audit or reporting requirements, and in accordance with our data retention policy.

As part of the financial industry, Foresters and its subsidiaries and affiliates have many legal and regulatory obligations regarding retention of personal information. Different retention periods may apply to your personal information depending on its specific purpose, its sensitivity, its potential risk of harm, as well as regulatory, legal, tax, anti-money laundering, employment, and accounting requirements. These could also vary depending on business purposes such as disaster recovery and business continuity, as well as prescribed limitations periods for administrative, civil and other legal claims. Generally, your personal information such as your Identity Information, your Financial Information and your Health-Related Information will be retained for the duration of your relationship with us, plus a period ranging between seven (7) and ten (10) years following the end of your relationship with us. Certain exceptions could apply, for example in case of legal or regulatory obligations, ongoing litigation, disputes or claims.

Once the applicable retention period reaches its end and the personal information is no longer necessary, we may without further notice delete your personal information in a secure manner, or in certain circumstances, anonymize it where permitted by applicable law. If we decide to anonymize, we remove direct and indirect identifiers in a manner such that you can no longer reasonably be re-identified.

You can request additional details on retention periods that apply to your personal information by contacting us at [privacy@foresters.com](mailto:privacy@foresters.com).

## **9. How do we protect your information?**

We strive to protect your personal information in our possession or control, including information transferred to a third-party service provider or representative, from the risk of loss, unauthorized access, disclosure, modification, or misuse. We comply with applicable laws and regulations and have implemented reasonable physical, electronic and procedural safeguards to protect your information that are appropriate for its sensitivity. For example, we encrypt your personal information and we use advanced firewall technology and layered security tools to protect our environment.

We regularly train employees to keep your information safe. Despite the measures outlined above, however, no method of information transmission or information storage is completely secure or error-free, so we unfortunately cannot guarantee absolute security. We have procedures in place to help us deal with suspected or actual privacy incidents or breaches, and we will notify you and any applicable regulator where legally required to do so.

For written information about our policies and practices regarding service providers outside of Canada, contact us using at the contact information in the "Contact Us" section below.

## **10. Your rights and choices**

You have the right to request in writing, to access and verify your personal information maintained in our files, and to be informed of the use, disclosure, and retention of your personal information. If you believe any of the information we have collected about you is incorrect or incomplete, you have the right to ask us to change it, or you may contact us to update your personal information in our records. We will address any such request as required by applicable law.

We may need to request specific information from you to help us verify and confirm your identity and validate your right of access to the relevant personal information, or to exercise any of your other rights. We may also contact you to ask you for further

information in relation to your request to properly fulfil our obligations. As permitted by law, we may request an extension period depending on the request made.

(For Quebec only): You have the right to request cessation of dissemination, de-indexation or re-indexation of your personal information. In certain cases, permitted by law, this will allow you to ask us to stop disseminating your personal information or to have a hyperlink attached to your name or access to your personal information de-indexed or re-indexed.

## **11. Complaints**

If you have a concern regarding our collection, use, and disclosure of your personal information you may contact us and we will explain our complaint procedure to you and investigate all complaints. If a complaint is justified, we will take all appropriate steps to address your complaint as required by law, including by changing our policies and practices if necessary. We will also let you know what other complaint procedures may be available to you.

## **12. Updates to this Privacy Policy**

We may amend this privacy policy from time to time to reflect changes in our personal information practices. We will post the revised policy on our website and make it available to you upon request. If the changes are substantial, we may also notify you of the changes using our customary methods of communication with you, including any of the following ways:

- A notice sent by email
- A notice or announcement on Foresters website or member portal, MyForesters.com
- A notice included with other correspondence or communication that we periodically send to you

## **13. Contact Us**

If you have any questions or wish to contact us about this policy, you may contact us:

Toll-free: 800-828-1540

By email: [privacy@foresters.com](mailto:privacy@foresters.com)

By regular mail:

Foresters Financial

Attn: AVP, Privacy and Compliance

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