

At Curo Claims Services ("Curo"), respecting your privacy and protecting your personal information is an important part of how we do business. We value the trust you have in us and we are committed to protecting your privacy.

## **Curo's Privacy Policy**

Curo is committed to keeping our clients' personal information confidential and secure. Our privacy policy is based on the Personal Information Protection and Electronic Documents Act (PIPEDA). A copy of PIPEDA is available at [www.privcom.gc.ca](http://www.privcom.gc.ca).

1. **Accountability** – We are accountable for all personal information in Curo's possession or control, including any personal information transferred to third parties for processing.
2. **Identifying the purposes for which information is collected** – We will identify the reasons for collecting personal information before or at the time of collection. We will collect information for purposes appropriate for the investigation of an incident involving loss, damage or injury. We may require information to:
  - ▶ establish your identity
  - ▶ establish and maintain communications with you
  - ▶ respond to your inquiries
  - ▶ investigate, evaluate, negotiate and settle claims
  - ▶ provide rehabilitation recommendations and services
  - ▶ compile statistics and conduct quality assurance reviews
  - ▶ detect error and fraud and protect you from them
  - ▶ comply with legal requirements
3. **Obtaining consent** – We will obtain consent for the collection, use and disclosure of your personal information, subject to certain legal, medical or security reasons that may make it impossible or impracticable to seek consent. Consent may be provided expressly (oral or written) or it may be implied depending on the circumstances. You can withdraw this consent at any time. Should you choose to withdraw consent, we will explain the implications of your decision.
4. **Limiting the collection of personal information** – Curo limits the collection of information to only what is needed to properly handle its range of independent claims services, to provide new services and to fulfill legal or regulatory requirements. Information will be collected by fair and lawful means by employees of Curo or by any of Curo's authorized representatives, agents or attorneys.

If your information is being collected by telephone, you will be advised in advance that the call is being recorded. Calls may be recorded:

- ▶ to establish a record of the information you provide
- ▶ to take or verify instructions from you, and
- ▶ for quality and training purposes

The information we gather about you varies, depending on the request. The types of information we collect may include, but are not limited to:

- ▶ name, address, telephone number and e-mail address
- ▶ age, gender, family and marital status
- ▶ driver's licence number
- ▶ driving record
- ▶ previous insurance and claims experience
- ▶ vehicle information
- ▶ details related to the loss or injury
- ▶ insurance policy information
- ▶ medical and health information (if injury is involved)
- ▶ employment and income information
- ▶ proof of ownership (e.g., vehicle, property)

5. **Limiting the use, disclosure and retention of personal information** – We will use or disclose personal information only for the purpose for which the information was collected, unless you give Curo consent to use or disclose it for another reason. Information collected by Curo will be exchanged with the insurance company for whom Curo is providing services. Information collected may also be disclosed to other parties involved in the claims process such as adjusters, lawyers, investigators, health care providers, hospitals, accountants, rehabilitation consultants, accident reconstruction experts, contractors, collision repair shops and other authorized agents/representatives performing duties and services on our behalf. In these cases, information disclosed will be limited to that which is necessary for the adjudication of the claim.

We will retain personal information for as long as legally required and in accordance with applicable provincial or federal law, or longer if commercial circumstances require.

6. **Keeping personal information accurate** – We will keep the personal information in our possession or control accurate, complete, current and relevant, based on the most recent information available to Curo. You may challenge the accuracy and completeness of your personal information and have it amended as appropriate.

7. **Safeguarding information** – We protect personal information with safeguards appropriate to the sensitivity of the information. We will protect personal information, regardless of its format, against unauthorized access, disclosure, copying, use or modification.

Any unprotected e-mail message may be subject to interception, loss or alteration. Curo is not responsible for damages related to e-mail messages sent by you or e-mail messages sent by Curo to you at your request.

8. **Openness** – We will be open about the procedures used to manage personal information. We will inform clients and employees of our policies and practices for the management of personal information.

9. **Providing access to personal information** – Upon request, we will advise you of the existence, use and disclosure of your personal information. We will respond to an access to information request within 30 days of receiving a written request. Access to information will be provided at a minimal cost. We are unable to provide access to information in the following circumstances:

- ▶ If doing so would likely reveal personal information about a third party
- ▶ If the information is subject to solicitor or client privilege
- ▶ If revealing the information would reveal confidential commercial information
- ▶ If the information relates to a client's 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
- ▶ When Curo is acting as an agent for an insurer or other instructing principal where that principal has the responsibility to respond to access to personal information

10. **Questions and/or complaints about privacy** – Individuals may challenge Curo's information handling practices and Curo's compliance with privacy legislation. Complaints and inquiries should be directed to Curo's Privacy Officer.

Privacy Officer  
Curo Claims Services  
125 Northfield Drive West  
PO Box 218  
Waterloo ON N2J 3Z9  
1-866-952-2876  
www.curocanada.com

We understand that keeping your information in strict confidence is important and we are committed to always protecting your privacy.

### **Web Site Security**

We monitor customer traffic patterns in order to improve site design for our clients. We do not sell, trade or rent your personal information to others. We may provide aggregate statistics about our traffic patterns and related site information to reputable third-party vendors, but these statistics will never include any personally identifiable information.

We also use "cookies", as do many other sites. Cookies are small pieces of information that are stored by the browser in your computer. If you visit a site and the site attaches a cookie to your system, the next time you visit that site, the cookie will pre-fill any information and selections you entered on your last visit. Cookies do not have the ability and cannot be used to retrieve any personal information about you or your family (e.g., names, ages, addresses, e-mail address, etc.) from your computer.

Any information we collect (e.g., your e-mail address) is protected against any unauthorized access using the most up-to-date technology. We safeguard your information by placing it on the secure portion of our network and not on our Web site, ensuring that your information stays private and protected.

### **Security**

The security of the information you provide is important to us. We use technology security measures to ensure that no loss, misuse or alteration of any information under our control occurs. We will not provide your information to any third party.

### **Access Security**

Exit from your browser when you have finished visiting the Curo Web site. This will sign you out and ensure that others cannot access your personal information or correspondence while you are away from your computer. This is particularly important if your computer is accessible to others, if you share a computer with someone else or are using a computer in a public place such as a library, lunch room or Internet café.

**If you have any questions regarding this privacy statement, please contact Curo's Privacy Officer at 1-866-952-2876.**