

Last updated: January 13th, 2025

OVERVIEW

It is very important to us at Best Doctors Canada Insurance Services (“BDCIS”, “we”, “us” and “our”) and affiliated companies (Best Doctors Insurance) to protect the confidentiality of your personal information. We are committed to protecting your information when you use our products and services, when you use our websites, portals, or apps, and when you apply for employment and work with us. We are also obligated to limit our collection, use, and disclosure of your personal information only for the purposes explained to you, or as is required or permitted by law.

We ask you to please read our Privacy Notice, which intends to clarify the type of personal information we may collect from prospective and existing clients, users of our website, job applicants, and employees, the ways in which we will manage, store, transfer and share that information, and other details of our privacy management program.

The purpose of this Privacy Notice is to allow you to make informed decisions respecting your personal information, while we establish a transparent and trusting relationship with you.

The processing of personal information is fundamental for our business as a provider of insurance products and services. Equally important is our clients' trust in our handling and protection of their personal information and privacy to which we are committed, in compliance with *Canada's Personal Information Protection and Electronic Documents Act* (“PIPEDA”), and its substantially similar provincial counterparts.

PIPEDA defines “personal information” as information about an identifiable individual. It includes information that can, on its own or in combination with other information, identify an individual, including:

- Name, address, and telephone number
- DNA, age, gender, race, national or ethnic origin
- Religion, family, and marital status
- Identifying numbers, such as social insurance or driver's license number
- Education, financial, and employment information
- Medical and health information

BDCIS collects, uses, and discloses your personal information to provide you with the insurance protection you request, when you apply for employment at BDCIS and work for us, or interact with us online, as described in more detail below. Doing so allows us to, among other things, establish your identity; understand and assess your needs and eligibility for products and services; analyze, underwrite, and reinsure risk; facilitate the payment of your premiums through the banking system; investigate and settle claims; protect you and us from fraud, error, and illegal activity; communicate with you; ensure quality; establish, manage, and terminate

employment relationships; and provide ongoing service and claims experience with satisfaction, among other things as discussed in more detail below.

We collect, use and disclose your personal information with your consent or as permitted and required by law. For the most part, we collect personal information from you directly; however, we may also collect your information from other sources, where necessary and based on your consent. At all times, we will only collect personal information pertinent to the applicable purpose.

We interpret your use of our website (and each sub-domain associated with the bestdoctorsinsurance.ca URL and other websites operated by or for Best Doctors Insurance (collectively, “the Sites”)), products and services, your communication with us, and your application for and acceptance of employment with BDCIS, as your consent for the practices described herein.

TEN PRIVACY PRINCIPLES

This Privacy Notice has been developed to comply with the Ten Privacy Principles set out in Schedule 1 of PIPEDA. Namely:

1. **Accountability.** BDCIS is responsible for the personal information that it collects, uses and discloses. We have implemented the controls and tools to keep it safe and private, and to ensure that the purposes for which BDCIS processes personal information are appropriate, as outlined in this Privacy Notice.
2. **Purposes.** Below, we identify the purposes for which your personal information is collected, used, and disclosed by BDCIS.
3. **Consent.** Our Privacy Notice explains the reasons and ways in which BDCIS, and our affiliates may collect your personal information.

Unless required or permitted by law, we process your personal information based on consent, which may be provided verbally, in writing, electronically, or through an authorized representative. It may also be implied when filling out forms and providing your personal information when navigating our website and related Sites.

You have the right to withhold your consent for the processing of your personal information. Similarly, you may withdraw your consent, subject to legal or contractual restrictions and reasonable notice. In both cases, doing so may affect BDCIS' ability to provide you a requested product or service, or establish your eligibility for insurance or benefit.

4. **Limiting Collection.** We will limit the collection of your personal information to those details that are necessary for the identified purposes and the terms of this Privacy Notice.
5. **Limiting use, disclosure, and retention of PI.** BDCIS will use and disclose your personal information for the

purpose for which it was collected, unless you have consented otherwise, or another use or disclosure is required or permitted by law. BDCIS will retain your personal information for the duration required to satisfy the purposes set out in this Privacy Notice, or as required or permitted by law.

6. **Accuracy.** BDCIS will keep your personal information as accurate, complete, and up to date as possible to fulfill the purposes for which it was collected. In this sense, you can assist us in ensuring your records are current by notifying us of any changes to your personal information. You have the right to challenge the accuracy and completeness of your personal information and amend it if necessary.
7. **Safeguards.** Our systems and procedures are designated to prevent loss, misuse, unauthorized access and disclosure, alteration, or destruction of your personal information.
8. **Openness.** If needed, we will make available information about our policies and practices relating to the management of your personal information.
9. **Individual access.** We will inform you about and/or provide access to your personal information upon written request, in accordance with the access rights provided under applicable privacy legislation.
10. **Challenging compliance.** You may contact us with questions, concerns, or complaints, by written or verbal means.

PERSONAL INFORMATION THAT WE COLLECT

We may collect personal information from individuals in a variety of ways, including, but not limited to when they visit our Site, register on the Site, subscribe to a newsletter, respond to a survey, apply for insurance, apply for employment, onboard as an employee, submit a claim or complete any other forms, communicate with us by phone, email, or through our website, and in connection with other activities, services, features, or resources we make available on our Site.

We collect personal information of our job applicants, employees and their emergency contacts, insureds and their dependents, and visitors to our website. Depending on how you interact with us, this information may include:

- Contact information, including name, mailing and email address, telephone number
- Demographic information, including birth date, gender, marital status, occupation, national or ethnic origin
- Government identifiers, including a social insurance number
- Insurance policy number and insurance and claims history

- Medical and health information, including information related to current and past health conditions, symptoms, diagnoses, treatment, identity and contact information for attending medical professionals and relevant health care institutions, and the costs of any treatment
- Financial information, including credit card and/or bank information
- Customer and claim experience and satisfaction, and other information required or permitted by applicable laws
- Information regarding your employment with BDCIS including, but not limited to, your engagement date, title and function, information provided by you during the recruitment, hiring, and onboarding processes, such as that included on your CV, information provided by your references, and information generated in connection with your duties as employees
- Background checks relevant to your employment with BDCIS, if applicable
- Any additional personal information provided through interactions with BDCIS, including with our customer service team

We generally collect personal information from individuals directly when they complete our forms, visit our Site, apply for employment, and otherwise voluntarily submit such information to us. When collecting information about an insured's spouse, dependents, or emergency contacts, we require the insured to obtain consent from those other individuals before supplying their personal information to BDCIS.

In some cases, we may generate personal information about an individual, or collect personal information through third parties, including physicians, hospitals, clinics, or other medical practitioners, government agencies, insurance and reinsurance companies and their agents, the **Medical Information Bureau**, employment references, and background check companies, based on individuals' consent or as required or permitted by law.

Given that BDCIS relies on the personal information to provide our services, we expect individuals to provide information that is true, accurate, and complete.

Individuals may refuse to supply the personal information requested, but doing so may impact the way in which they can interact with our Sites or receive our products or services, or their eligibility for employment with BDCIS.

COLLECTION AND USE OF WEB BROWSER COOKIES

BDCIS collects personal information when individuals interact with our Sites, using cookies and other web trackers. This information typically includes browser name, type of computer and technical information about the users' means of connection to our site, such as the operating system, IP address, the Internet service providers utilized, and similar information.

Cookies are small text files used by websites to track and collect data from browsers. This information is then stored on the device used to connect to the Internet. Cookies allow us to better understand the user's preferences to offer personalized content, mainly through advertisements. Advertising partners, who may set cookies, may deliver ads appearing on our site. These cookies allow the ad server to recognize your computer each time they send you an online advertisement to compile non-personal identification information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of your interest. This privacy policy does not cover the use of cookies by any advertisers.

Our Site may use cookies to enhance your experience. Your web browser places cookies on its hard drive for record-keeping purposes and, sometimes for information tracking. You may choose to set your web browser to refuse cookies or to be alert when cookies are being sent. If you do so, note that some parts of the Sites may not function properly.

HOW DO WE USE THE COLLECTED INFORMATION?

BDCIS uses the personal information we collect for a number of purposes, based on how an individual chooses to interact with us. This may include to:

To process applications for our products and services. The information collected allows BDCIS to identify you, ensure the accuracy of the information you provide, understand and assess your needs and eligibility for BDCIS products, services, and benefits.

To assess eligibility for employment. The information collected during the recruitment process, including personal information in CVs and job applications, and that provided by references and background checks, allows BDCIS to assess individuals' eligibility for employment with us.

To process and administer claims. BDCIS uses personal information to analyze, underwrite, and reinsure risk, and to investigate, adjudicate and settle claims.

To provide and improve customer service. The information you provide helps us respond to your customer service requests and support needs more efficiently. It also allows BDCIS to engage in quality assurance activities, conduct statistical analysis, and generate business insights.

To establish, manage, and terminate our employee relationships. BDCIS uses personal information to onboard employees, and to manage and terminate its employment relationships, which may include, among other things, communicating with employees or their emergency contacts, conducting performance appraisals and implementing performance management plans, administering benefits, conducting diversity reporting and initiatives, generating statistics and reports to understand BDCIS' business operations, and enabling business management and planning.

To personalize the user experience. We may use information taken together to understand how you and others use the services and resources provided on our Sites.

To improve our offerings. We may use feedback you provide to improve our Sites, products and services.

To process payments and payroll. We may use personal information to facilitate the payment of payroll and premiums, and to service claims.

To run a promotion, contest, survey, or other site feature. With consent or as otherwise permitted by applicable legislation, we may send individuals information about topics we think will be of their interest unless they explicitly ask not to receive it.

To communicate with our prospective and current customers. We may send correspondence related to the products or services and individual uses or has expressed an interest in, and to respond to their inquiries, questions, and/or other requests. If a user decides to opt-in to our mailing list, they will receive emails that may include company news, updates, related product, or service information, etc. If at any time the user would like to unsubscribe from receiving future emails, they can follow the unsubscribe instructions at the bottom of each email or may contact us via our Sites.

To meet regulatory and legal requirements.

To detect and prevent fraud, errors, and illegal activity.

And as otherwise required or permitted by law.

If BDCIS intends to process your personal information for another purpose, it will first seek your consent unless it is permitted or required by law to process the personal information without doing so.

SHARING YOUR PERSONAL INFORMATION

BDCIS may transfer or disclose your personal information for the purposes described in this Privacy Notice. We may disclose personal information to our affiliated companies, other insurers and reinsurers, agents and representatives, and the Medical Information Bureau for the purposes mentioned in this Privacy Notice, or if permitted or required to do so by law. For example, your name and insurance policy number be provided to another insurance company to obtain a claims history. BDCIS obtains your consent to disclose your personal information, when required. Such consent is typically obtained when you apply for or renew an insurance policy, submit a claim, or complete another form. In appropriate circumstances, your consent may be implied.

Furthermore, BDCIS may disclose your personal information to any person authorized by you, anyone required or permitted by law to have access to your personal information, and as necessary to meet our legal and regulatory requirements.

We also use third-party service providers to help us operate our business and the Site and may transfer your information to these third parties for those purposes. Such third-party service providers are required, through contractual or other means, to only process the personal information for the purposes of providing services to BDCIS, and to protect the information in a manner that is consistent with our privacy and security policies and practices

As a result of these sharing practices, your personal information may be stored or processed in jurisdictions outside of your province of residence and Canada, including the United States. These jurisdictions might not have laws that provide privacy protections in the same way as those of Canada.

When your personal information is processed or stored in another jurisdiction, it will be subject to the laws in that jurisdiction and may be disclosed in response to demands or requests from governmental authorities and law enforcement.

THIRD PARTY WEBSITES

Visitors to our Sites may find links to the sites and services of our partners, suppliers, advertisers, sponsors, licensors and other third parties. We do not control the content or links that appear on these third-party sites and are not responsible for the practices employed by websites linked to or from our Site.

In addition, these sites or services, including their content and links, may be constantly changing. These sites and services may have their own privacy policies. Browsing and interacting with other websites linked to our Sites is subject to that website's own terms and policies, which we encourage individuals to review. For clarity, this Privacy Notice does not apply to third party websites that may be accessible through the Sites, nor to the practices of persons or entities that Best Doctors Insurance does not control, manage, or employ.

HOW DO WE PROTECT YOUR INFORMATION?

We have implemented appropriate data collection, storage and processing practices as well as physical, administrative, and technical security measures to protect personal information against unauthorized access, alteration, transfer, disclosure or destruction. For example, access to personal information is limited to employees who require the information in the conduct of their employment duties. Further, information exchanged between the Sites and their users happens over an SSL secured communication channel and is encrypted and protected with digital signatures. Our Sites are also in compliance with PCI vulnerability standards to create a secure environment for users.

INDIVIDUALS' RIGHTS

Depending on where you live and how you interact with BDCIS, you may have the right to access the personal information that BDCIS holds about you, to challenge its accuracy and completeness, and request corrections. You may also have the right to withdraw your consent to BDCIS' processing of your personal information, subject to legal or contractual restrictions and reasonable notice.

In certain jurisdictions, particularly in Québec, individuals may also have the right to request certain personal information in a structured, commonly used technological format.

To learn about and exercise your privacy rights, please contact our Privacy Officer using the contact information provided below.

CHANGES TO THE PRIVACY NOTICE

BDCIS has the discretion to update this Privacy Notice from time to time. We encourage individuals to frequently check this page for any changes and to stay informed about how we are processing and protecting the personal information we collect.

All changes will be effective immediately upon posting, as indicated by the date at the top of this document.

CONTACT US ABOUT PRIVACY

If you have questions, concerns, requests, or complaints you may contact us at:

Privacy Officer

Best Doctors Canada Insurance Services Inc.

9131 Keele Street, Unit A4

Vaughan, ON L4K 0G7

Telephone 1.855.667.4028

Email: bdcanada@bestdoctorsinsurance.com