



Our Commitment to Protecting Your Privacy

We value you as a customer and are committed to honouring the trust you have placed in Stratford Underwriting Agency (“**Stratford**”).

We are committed to protecting the privacy, confidentiality, accuracy and security of your personal information and complying with all applicable privacy laws. We are accountable for compliance with PIPA British Columbia’s [*Personal Information Protection Act \(“PIPA”\), SBC 2003, c.63*](#), which sets out rules for how organizations collect, use and disclose personal information. We are also responsible for compliance with the federal *Personal Information Protection and Electronic Documents Act, S.C. 2000, c 5 (“PIPEDA”)* in circumstances where personal information may cross provincial or international borders.

Stratford’s Privacy Policy describes the steps we take to protect your personal information, why we collect, use, retain and disclose your personal information, whether it was obtained through our brokers, online, or your direct dealings with Stratford.

Please contact us if you have any questions regarding Stratford’s Privacy Policy.

What Personal Information Do We Collect

Personal information is information reasonably capable of identifying you either alone or when combined with other information.

When you complete your Application of Insurance, we obtain your signed consent to our collect, use and disclose of your personal information in the manner described herein.

You may withdraw your consent at any time by providing us with written notice. However, if your consent is withdrawn, we may not be able to provide our services as a consequence of your withdrawal. You may contact our Privacy Officer for further details on the implication of any withdrawal of consent.

Types of information we may collect include your name, address, email address, telephone number, driving experience history, date of birth or age, claims history information including your history from your prior insurance companies, motor vehicle conviction history, payment card or banking information, medical information requested on our Application for Insurance form, employment information, publicly available personal information, how you interact with our websites, internet protocol address, and other information you choose to provide. If you present a claim as a result of an accident or injury, we will seek your further consent before collecting your medical and health information related to the claim. If you select e-delivery for your policy documents including for your renewal documents, we will collect information to verify your identity.

Your personal information is obtained from a variety of sources, including:

- your quotation, application and claim forms, and other forms;
- your telephone calls including recorded calls to Stratford’s claims and broker support units, emails, SMS text messages, letters and other communications;

- brokers and agents, claims investigators, witnesses, medical professionals (in circumstances where you have provided additional consent), driver and motor vehicle licensing authorities, insurance companies including ICBC, your employer, and other third parties;
- Stratford's websites;
- the software applications made available by Stratford on computers, smart phones and other mobile devices; and
- social media pages, tools and applications.

If you participate in Stratford's Usage-Based Insurance Program and have the UBI App, we will capture data including date, time, location and other driving related information for the purposes of calculating and charging premium, general research and analysis. The information collected includes:

- speed;
- duration;
- acceleration;
- braking; and
- cornering.

Why Do We Ask For Your Information

We will limit the information we collect to what we need for the purposes noted herein, and we will use it only for those purposes. We will obtain your additional consent if we wish to collect, use or disclose your personal information for any other purpose.

We will ask for your personal information and any other person(s) information as part of your application, to assess your application for insurance, to administer your insurance policy, and investigate and process your claims, on behalf of the underwriter(s).

Other reasons we ask for your personal information may include:

- completing a quotation;
- issuing and administering your insurance policy on behalf of the underwriter(s);
- determining your insurance premium;
- for review and analysis to verify your claims and driving information;
- assessing and settling your claim on behalf of the underwriter(s);
- administer payment plans;
- processing renewal of your insurance policy;
- keep you informed about your renewal by emails, telephone, or SMS text messaging;
- for product development and statistical purposes;

- to meet regulatory requirements;
- to detect and prevent fraud and insurance abuse;
- to develop and improve services Stratford and your broker provide to you.

We will monitor and record calls, emails, SMS text message and other communication for business purposes including training, prevention of unauthorized use of our telecommunication systems and websites, and as a record of our conversation or correspondence.

Do We Share Your Information

In order to provide our services, your personal information may be shared with third parties for the purposes listed herein.

Deliver and Administration of Your Insurance Coverage

If you are applying for, renewing or modifying your insurance, or making a claim we may collect, use and disclose your personal information to determine your eligibility for insurance coverage with us, service and administer your insurance, investigate and adjudicate your claim, and manage and assess risk.

Service Your Insurance with Our Service Providers

We also share a limited amount of information with service providers, such as our underwriters, agents and other vendors, as well as body shops, independent adjusters, and ICBC or other insurance companies, in order to provide services to you or on our behalf.

Other third-party service providers may include security professionals, IT systems support, and hosting service providers and, in the event of a claim, medical professionals, accountants, actuaries, examiners, auditors, experts, MSMS engineers, lawyers and other professional advisors.

In certain limited circumstances, the law permits personal information to be collected, used and disclosed without your knowledge and consent, such as in exceptional cases where the knowledge of the collection, use or disclosure may compromise an investigation, or where the disclosure is required in relation to a contravention of a federal or provincial law, or required by regulatory bodies.

We may disclose your personal information without your knowledge or consent to comply with a court subpoena, warrant or court order, or as may otherwise be required or permitted by law.

Your information may be shared, stored or accessed in Canada or the United States, that are under contract with Stratford Underwriting Agency, in compliance with Canadian privacy laws, as well as in compliance with the terms of this Privacy Policy.

How We Store and Protect Your Information

We will protect your information with appropriate safeguard and security measures. Information security is extremely important to us.

We have security standards to protect our systems and your information is safe and secure. All employees of Stratford Underwriting Agency are trained on data protection and security that must be

taken to safeguard your information. Our service providers and agents are required to maintain your confidentiality and may not use your information for any unauthorized purpose.

As most of your information we hold is stored electronically we have implemented appropriate IT security measures to ensure this personal information is kept secure. For example, we may use anti-virus protection systems, firewalls, and data encryption technologies. Our service providers who collect or otherwise process personal information on our behalf, the third party will be selected carefully and required to use appropriate security measures to protect the confidentiality and security of Personal Information.

Unfortunately, no data transmission over the Internet or electronic data storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us.

If your personal information is used to make a decision that directly affects you, we will retain that information for at least one year so that you have a reasonable opportunity to obtain access to it. We destroy documents containing personal information, or remove the means by which personal information can be associated with you, as soon as we reasonably determine that the purpose for which the information was collected is no longer served by retaining the information and when it is no longer necessary for legal or business purposes.

How Can You Correct, Access or Delete Your Information

We will make reasonable efforts to keep your information accurate and current. Maintaining accurate information about you enables us to provide you with better service and offer you products and premium that reflect your current personal information.

We have procedures and practices in place to help us maintain the accuracy of your information. For most updates, we rely on you for information. If you find any errors in our information about you, please contact us and will correct or amend any personal information if the accuracy is found to be deficient and, and if required we will communicate the corrections to anyone to whom we may have provided the information that requires correction or updating.

Upon sending a request in writing to our Privacy Officer, we will inform you of the existence, use and disclosure of your personal information and will give you access to that information. Your personal information will be provided in an understandable form within 30 business days, unless an extension is granted under *PIPA*. You may be required to confirm your identity before we process the request. We may charge a minimal fee for responding to your request. If a fee is required, we will provide you with an estimate in advance.

While you may make a request to see your own information, we are required by law not to provide you with access to the personal information belonging to another individual, unless that other individual consents. We may not be able to provide all personal information we hold about you for reasons that it includes information containing certain references to other individual, information that cannot be disclosed for legal, security, or commercial proprietary reasons, or information that is subject to solicitor-client privilege.

Who To Contact If You Have A Privacy Questions, Complaints or Concerns

If you have any questions or concerns about the privacy or accuracy of your personal information, would like to access your personal information, or would like to make a privacy related complaint, please contact our Privacy Officer whose contact information is as follows:

Stratford Underwriting Agency Inc
Privacy Officer
209-949 3rd Street W
North Vancouver, BC V7P3P7

privacy@stratfordunderwriting.ca
604.282.0670 extension - customer concerns

We ask that all requests to access or correct your personal information and all privacy related complaints be made in writing by mail or email to the Privacy Officer at the above addresses.

If you have made a privacy related complaint to our Privacy Officer and are not satisfied with how we perform our obligations under *PIPA*, or wish to seek a review of our response to an access or correction request, you may contact the Office of the Information and Privacy Commissioner at:

Office of the Information and Privacy Commissioner for British Columbia
PO Box 9038 Stn. Prov. Govt.
Victoria B.C. V8W 9A4

info@oipc.bc.ca
604.660.2421 (Vancouver)
1.800.663.7867 (Elsewhere in British Columbia)

Communication Preferences

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Cookies are pieces of information stored directly on the device you are using. Cookies allow us to recognize your device and to collect information such as internet browser type and pages visited. We may use the information to facilitate navigation, to display information more effectively, and to personalize your experience. In addition, we may use the information to gather statistical information about the usage of our website in order to understand how they are used and continually improve the design and functionality. We may also use cookies to track your responses to our advertisements and we may use cookies or other files to track your use of other websites.

How Will You Know If There Are Changes to This Privacy Code

This privacy policy was last updated January 6, 2020. We reserve the right to make changes to this policy and you will be informed of any changes when you next visit our website. You should review our privacy policy on a regular basis to ensure you are familiar with this Privacy Policy.