

## *Andrew Agencies Ltd*

### **Privacy Policy.**

## **A Declaration of Client Privacy Rights – Putting The Client First**

- As professional brokers we at Andrew Agencies Ltd. are committed to holding our client's personal information in strict confidence, and we shall not disclose any such information unless authorized by our clients, required by law to do so or required to do so in conducting negotiations with underwriters or insurers on behalf of the client. Our Privacy Code builds on this commitment.

### **Principle # 1 Accountability**

Andrew Agencies Ltd. is accountable for all personal information in its possession or custody, including any personal information disclosed to third parties for processing or other administrative functions. Andrew Agencies Ltd. has established policies and procedures to comply with this declaration, and has designated a privacy officer to be accountable for compliance.

### **Principle # 2 Identify Purposes**

Andrew Agencies Ltd. will identify the purposes for which it collects personal information, before or when the information is collected. The information may be collected for the following purposes as required but not limited to:

- Offering and providing insurance products and financial services to you
- Establishing and maintaining communications with you
- Verifying the accuracy of your personal information with insurance companies, investment companies, or government agencies
- Offering and assisting in claims service
- Facilitating your payment of premium and fees
- Analyzing business results
- Complying with the laws or requests of regulators
- Notifying you of certain products offered by our company
- Collect, use and disclose personal information and provide such information to third parties as required to properly perform our obligation to you as a client of our company.

### **Principle # 3 Consent**

Andrew Agencies Ltd. will make a reasonable effort to make sure customers understand how their personal information will be used by the brokerage and insurers. Andrew Agencies Ltd. will obtain consent from its customers before or when it collects or uses the personal information.

A customer's consent can be express, implied, or given through an authorized representative. A customer can withdraw consent at any time, with certain exceptions.

### **Principle # 4 Limit The Collection of Personal Information**

Andrew Agencies Ltd. limits the amount and type of personal information it collects. We will collect personal information for the purposes identified to the customer. Andrew Agencies Ltd. collects personal information using policies and procedures which are fair and lawful.

## **Principle # 5 Limits the Use, Disclosure and Retention of Personal Information**

Andrew Agencies Ltd. will use or disclose personal information only for the reasons it was collected, unless a customer gives consent to use or disclose it for another reason, or it is permitted or required by law.

Under certain exceptional circumstances, Andrew Agencies Ltd. may have a legal duty or right to disclose personal information without the customer's knowledge or consent to protect the interests of insurers or the public interest.

Andrew Agencies Ltd. will keep personal information only as long as necessary for the identified purposes for which it was collected.

## **Principle # 6 Keep Personal Information Accurate**

Andrew Agencies Ltd. will keep personal information as accurate, complete and current as necessary for the identified purposes for which it was collected.

Customers may, in writing, challenge the accuracy and completeness of their personal information and request that it be amended as appropriate.

## **Principle # 7 Safeguards**

Andrew Agencies Ltd. protects personal information with safeguards appropriate to the sensitivity of the information.

## **Principle # 8 Information Policies Available to Clients**

Andrew Agencies Ltd. is open about the policies and procedures it uses to manage personal information. Customers have access to information about these policies and procedures. The information will be made available in a manner that is generally easy to understand.

## **Principle # 9 Personal Information Accessible**

When customers make a request in writing, Andrew Agencies Ltd. will within a reasonable time tell them what personal information it has, what it is being used for, and to whom it has been disclosed.

When customers request it in writing, Andrew Agencies Ltd. will give them access to their personal information. Andrew Agencies Ltd. will respond to the written request in a timely fashion. In certain situations, however, Andrew Agencies Ltd. may not be able to give customers access to all their personal information. Andrew Agencies Ltd. will explain the reasons for this lack of access and any recourse the customer may have, except where prohibited by law.

## **Principle # 10 Committed to Addressing Client Complaints and Concerns**

Customers may challenge Andrew Agencies Ltd. compliance with this declaration. Andrew Agencies Ltd. has policies and procedures to receive, investigate, and respond to customers' complaints and questions. Customers may learn about these policies and procedures by contacting the brokerage privacy officer at (204) 748-4803 or in writing to :

Privacy Compliance Officer  
c/o Robert Eslinger  
Andrew Agencies Ltd  
Box 1508  
Virden, MB R0M 2C0