

It is very important to us at Best Doctors Canada Insurance Services (BDCIS) 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, or when you use our websites, portals, or apps. We are also obligated to collect, use, and disclose your information only for the purposes explained to you.

We ask you to please read our Privacy Notice, which intends to clarify the type of information we may collect from you, the ways in which we will manage, store, transfer and share it, always observing the applicable privacy provisions and legislation.

The collection and use 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 information and privacy to which we are committed, in compliance with Canada's Personal Information Protection and Electronic Documents Act (PIPEDA).

According to the Privacy Commissioner of Canada, privacy is an individual's right to maintain control over the uses and circulation of her/his information.

PIPEDA defines personal information as info that on its own or combined with other pieces of data can identify someone as an individual. It includes, but is not limited to:

- 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
- Previous insurance and claims

BDCIS collects, uses, and discloses your personal information to provide you with the insurance protection you request. That allows us to 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, and provide ongoing service and claims experience with satisfaction.

We collect your information, use it, and disclose it with your consent or as permitted and required by law. We may also need to collect your information from other sources; however, we will only collect information pertinent to the appropriate purpose. This includes:

- Name, address, telephone/cellphone numbers, emails
- Birth date, gender, marital status, national or ethnic origin
- Medical and health information
- Credit card and/or bank information
- Customer and claim experience and satisfaction, and other information required or permitted by applicable laws

You, or any person authorized by you, may provide information on applications of insurance products, or on other forms filled in person, through the phone, email or online on our sites.

However, you can visit BDCIS' webpage and most pages of the sites (as defined under the Terms of Use) without giving us any information about yourself. Nevertheless, sometimes we need your information to provide the services you request from us.

This Privacy Notice and the Terms of Use explain data collection and use in the referred formats and situations, as well as our online privacy information practices. This intends to allow you to make informed decisions while we establish a transparent and trusting relationship with you.

By visiting the sites, you meaningfully consent to those practices, which may change and update, from time to time. All changes will be effective immediately upon posting. Therefore, we encourage you to frequently read the entire Privacy Notice and Terms of Use.

Likewise, by visiting BDCIS's website [bestdoctorsinsurance.ca](http://bestdoctorsinsurance.ca), you accept the practices described in this Privacy Notice, which apply to each sub-domain associated with this URL, and to other websites operated by or for Best Doctors Insurance (collectively, "the Sites").

This Privacy Notice does not apply to other sites 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.

We may also collect non-personal identification information of users whenever they interact with our Sites. That information may include the browser name, the 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, cookie data, or similar information.

## PERSONAL IDENTIFICATION INFORMATION

We may collect personal identification information (PII) from users and clients 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, fill out a form or in connection with other activities, services, features, or resources we make available on our site.

We will collect PII from users if they voluntarily submit such information to us. Users can always refuse to supply it, but that may prevent them from engaging in certain site related activities.

Users may also be asked for their name, age, email address, and phone number; however, they may visit our site anonymously.

## YOUR PERSONAL INFORMATION

The information you submit and provide to us is expected to be true, accurate, and complete in all ways, and you acknowledge that BDCIS relies on that information to provide you the adequate service for your insurance coverage.

BDCIS always makes every reasonable effort to protect the confidentiality of your personal information. However, we cannot guarantee a zero risk or absolute privacy, confidentiality, and security. Therefore, BDCIS cannot be held responsible or liable for any harm or loss of the information you provided to us.

In accordance with PIPEDA's fair information principles, our clients have the right to access and correct their personal information -which we procure to always keep safe- to

challenge its accuracy and completeness; to request its deletion and to formally complain about any breach with the Office of the Privacy Commissioner of Canada.

## HOW DO WE PROTECT YOUR INFORMATION?

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, transfer, disclosure or destruction of your personal information, username, password, transaction information and data stored on our site.

## SHARING YOUR PERSONAL INFORMATION

BDCIS may share your information with any person authorized by you; with anyone required or permitted by law to have access to your personal information; with any person when it is necessary to meet our legal, regulatory, insurance, audit, processing, and security requirements, or to protect our reasonable business interests.

We may share your personal info with other insurers, agents, and brokers; with professionals, such as lawyers, doctors or adjusters working with or for us; with credit card issuers and processors, and with data collection agencies for analyzing business results.

We take great care in the selection of our services providers due to our commitment with a consistent high level of service and quality. The service providers include, but are not limited to paramedical examiners, doctors, nurses, medical laboratories, hospitals, clinics, rehab facilities, pharmacies, the Medical Information Bureau, specialty coverage providers for expatriates, local independent medical examiners, and travel assistance providers, among others.

Where personal information is shared with our service providers, we will require them to protect the information in a manner that is consistent with our privacy and security policies and practices. We, or our service providers acting on our behalf, may process and/or store some or all your personal information in jurisdictions outside of Canada, including the United States. You should note that some jurisdictions might not have laws that provide privacy protections in the same way as those of Canada. However, you may rest assured that we take reasonable contractual and other type of measures to protect your personal information while processed or handled by our service providers.

We may also use third-party service providers to help us operate our business and the site, or administer activities on our behalf, such as sending out newsletters or surveys. We may share your information with these third parties for those purposes, provided that you have given us your permission.

Your consent is implied or inferred from actions such as navigating our website and providing your personal information; filling out an application; presenting an ID or your member identification to a healthcare provider, for us to process a claim.

Similarly, by providing personal information about a third party such as a family member, we assume that you have obtained their consent to the collection, use and disclosure of such personal information, in accordance with this Privacy Notice.

You may withdraw your consent for us to collect, use and disclose your personal information, as long as there are no 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 products and/or services you have requested. In the case of insurance, individual or group benefits, it may prevent us from keeping your coverage in force or from properly evaluating and processing your claims.

## BDCIS' PRIVACY POLICY

Our policy has been developed to comply with the Ten Privacy Principles set out in the federal government's privacy legislation, the Personal Information Protection and Electronic Documents Act (PIPEDA), namely:

1. **Accountability.** BDCIS is responsible for the personal information in our possession. We have implemented the necessary controls and tools to keep it safe and private, according to the practices outlined in this Privacy Notice.
2. **Purposes.** We will identify the purposes for which your personal information is collected, before or at the time of collection. Among the purposes of collection, use and disclosure are the following:
  - Confirm your application information and assess your eligibility for products and services.
  - Provide you with ongoing services; establish and maintain communication with you and respond to any inquiries you may have.
  - Identify you and ensure the accuracy of your personal information.
  - Process and adjudicate your claims and determine your eligibility for benefits.
  - Meet regulatory and legal requirements.
  - Protect our business against fraud and other illegal activities.
3. **Consent.** Our Privacy Notice explains the reasons and ways in which BDCIS and our affiliates may collect your personal information, as well as the purposes for that. We collect, use, and disclose your info according to this Privacy Notice, except when otherwise required or permitted by law.

Your consent may be given verbally, electronically or through our or your authorized representative(s). It may also be implied when filling out forms and providing your personal information when navigating our website and related Sites.

It is your right not to provide us with some or all your personal information in which case BDCIS may not be able to provide you a requested product or service nor establish your eligibility for insurance or a claim benefit.

You may deny us or withdraw consent to use or disclose your personal information for certain purposes. This will need to be specifically communicated to us in a written way.

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 your personal information for the purpose for which it was collected, unless you have consented otherwise, by different means and according to the terms of this Privacy Notice, or when 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. You will need to communicate it to us in a written way.
- 7. Safeguards.** Our systems and procedures are designated to prevent loss, misuse, unauthorized access and disclosure, alteration, or destruction of your personal information. Only authorized employees and service providers of Best Doctors Insurance have access to it. Some service providers may be located outside of Canada. However, our commitment to security extends to the contracts and agreements that we sign with external suppliers and service providers.
- 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 your personal information upon written request, subject to any legal or business restrictions. You may also request to amend your personal information if necessary.
- 10. Challenging compliance.** You may contact us with questions, concerns, or complaints, by written or verbal means.

## CHANGES TO THE PRIVACY NOTICE

BDCIS has the discretion to update its privacy policy at any time. We encourage users to frequently check this page for any changes and to stay informed about how we are protecting the personal information we collect.

You acknowledge and agree that it is your responsibility to review the privacy policy periodically and become aware of modifications.

## 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

## TERMS OF USE

The following Terms of Use and conditions are a legally binding contract between you and Best Doctors Canada Insurance Services (BDCIS) pertaining to the access and use of the services offered and all products, information, content, media, printed materials and "online" or other electronic documentation accessible from [bestdoctorsinsurance.ca](http://bestdoctorsinsurance.ca), any sub-domains thereof or other websites operated by or for Best Doctors Insurance (collectively, "the Sites"). Please review them carefully.

The Sites are all offered by BDCIS to you, free of charge on the express condition that you accept, without modification, and abide by these Terms of Use.

Your access and use of the Sites is conditioned upon your continued compliance with these Terms of Use. Please read them carefully, as your use of the Sites constitutes your acceptance of these Terms of Use.

Best Doctors reserves the right to change these Terms of Use at any time without notice, and such amended terms shall be binding; thus, you should consult the most recent version of these Terms of Use each time that you view the Sites.

## WEB BROWSER COOKIES

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 also allow to better understand the user's preferences to offer personalized content, mainly through advertisements.

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.

## PROTECTION OF YOUR INFORMATION

Sensitive and private data exchange 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.

## HOW DO WE USE THE COLLECTED INFORMATION?

If you provide BDCIS with personal information when you visit our Sites, we may use it in our programs and activities. We may enter your name into one of our databases so we can contact you to obtain your input, provide you with information about our programs and events or request contributions.

Furthermore, BDCIS may collect, store, or share your personal information for the following purposes:

**To improve customer service.** The information you provide helps us respond to your customer service requests and support needs more efficiently.

**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 Site.** We may use feedback you provide to improve our products and services.

**To process payments.** We may use the information users provide about themselves when placing an order only to provide service to that order. We do not share this information with outside parties except to the extent necessary to provide the service.

**To share your information with third parties.** We may share or sell information with third parties for marketing or other purposes.

**To run a promotion, contest, survey, or other site feature.** To send users information about topics we think will be of their interest unless they explicitly ask not to receive it.

**To send periodic emails.** We may use the email address to send information and updates pertaining to users' orders. It may also be used 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.

## THIRD PARTY WEBSITES

Users may find advertising or other content on our Sites that link 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 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 and customer service policies. Browsing and interaction on any other website, including websites, which have a link to our Sites, is subject to that website's own terms and policies.

## ADVERTISING

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.

## YOUR ACCEPTANCE OF THESE TERMS

By using our Sites, you signify your acceptance of these terms of use. If you do not agree with them, please do not use our Sites. Your continued use of the Sites will be your acceptance of the Privacy Policy, Terms of Use, and any updates to them.

## LINKS TO OTHER SITES. LINK AGREEMENT

BDCIS may provide links to other Internet sites or resources. Likewise, may permit others to post on certain public forums links to other Internet sites or resources. The information provided to you in such links is solely for your interactive enjoyment. The results are not guaranteed to be accurate and are in no way endorsed, offered, or guaranteed by BDCIS.

You should be aware that links to the Sites may be provided by other sites, either known or unknown to BDCIS, and some links to the Sites may be unauthorized. Accessing other sites linked to or from the Sites is done at your own risk. BDCIS is not responsible for the content of any third-party sites linked to or from the Sites.

The sites contain links to other sites that are operated by third parties that may display the name, trademarks, service marks and logos of Best Doctors, so we encourage you to read the privacy policies of those other sites to learn how they collect and use your information.

When using the sites, visitors meaningfully consent BDCIS to collect, share, transfer and store their personal information for commercial purposes.

## GENERAL INDEMNIFICATION

You agree that you will hold harmless Best Doctors Canada Insurance Services and affiliated companies, their officers, directors, employees, volunteers, licensors, and suppliers from all claims arising of, or related to your access or use of, or your inability to access or use of the Sites or other sites to which they are linked.

None of the information contained on this site may be used in a claim, legal proceedings, or legal action against BDCIS, its subsidiaries, service suppliers or business partners.

If your use of materials from the Sites results in the need for servicing, repair of equipment or data, you will assume any costs thereof.

## MISCELLANEOUS

These Terms of Use are written in English and this language shall control. They shall be interpreted in accordance with the commonly understood meaning of the words and phrases in the United States of America.

You waive any right that you may have under local law to receive these Terms of Use in any language other than English.

These Terms of Use (and each supplemental agreement referenced in or referencing these Terms of Use found on the Sites) constitutes the entire agreement between you and Best Doctors Canada Insurance Services with respect to the Sites and the services.

## COPYRIGHT

The content in the Sites may not be reproduced, disseminated, published, or transferred, in any form or by any means, except with the prior written permission of BDCIS.

## CONTACT US

If you have questions about these Terms of Use, 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