

BRYAN H. LUPE AND ASSOCIATES LIMITED  
**Our Privacy Code**

**Protecting your Privacy**

Bryan H. Lupe and Associates Limited and Associated Companies (collectively referred to as “BHL”) have always been, and will continue to be, committed to protecting your privacy and ensuring your personal information remains confidential. We ensure compliance by our staff with strict standards of security and confidentiality.

The purpose of our Privacy Code is to inform you about our privacy protection practices and our reasons for collecting your information. Our Privacy Code applies to all aspects of handling your information, including collection, use, retention and disclosure.

**What is personal information?**

Personal information means information about an identifiable individual such as: name, address, age, contract number, employment information, medical records, and financial information.

**Why do we collect, use, retain and disclose your information?**

We collect, use, retain and disclose your information for the following purposes:

- i. to administer the terms of your plan, including the determination of your eligibility for insurance coverage and BHL benefits and services, and for the purposes of processing and settling claims;
- ii. to develop and recommend suitable products and services to you; and
- iii. to manage BHL’s business, including to protect both you and BHL from error and fraud, to help safeguard the financial interests of you and BHL, and to meet legal and regulatory requirements.

**How do we collect your information?**

When you and your dependents join, make claims, or request service under a BHL group or individual plan we must obtain specific information from you, including personal information. We obtain most of this information directly from you. We collect this personal information voluntarily through written, verbal, or electronic contact with you. Your consent may be express or implied, depending on the nature of the personal information being collected.

We may also collect personal information about you from your employer, from licensed physicians and other health care professionals or institutions, and from other organizations that you are covered with, such as your provincial medical plan or another benefit carrier.

In limited circumstances, as set forth in this Privacy Code or contained in applicable privacy laws (e.g. in an emergency to protect human life or safety), we may collect, use, retain or disclose personal information without your consent.

**When do we disclose information?**

We may disclose your personal information in the following circumstances:

1. We may disclose personal information about you to any Insurer or Third Party Administrator and other BHL organizations for the purpose of administering our policies.
2. We may disclose personal information about you to licensed physicians and other healthcare professionals or institutions for the purposes of determining your eligibility for insurance coverage, benefits and services and for processing and settling claims.
3. In the event that you or your dependents are covered by another insurer, we may disclose personal information about you or your dependents to such other insurer in order to determine eligibility for insurance coverage, benefits and services and for the purposes of processing and settling claims. This is in accordance with our contractual obligations.

4. We may disclose your information to a person who seeks the information as an authorized representative of you such as a Power of Attorney or an Insurance Agent.
5. We may disclose personal information to the insured (i.e. cardholder) of any policy or plan under which you are listed.
6. We may disclose personal information about you to third parties (including auditors, consultants, reinsurers and potential purchasers), on a confidential basis, for the purpose of managing BHL's business. This includes situations where we are involved in a corporate reorganization or when we sell all or part of our business, or when we need to disclose personal information to protect our interests in the context of a legal or administrative proceeding.
7. We may disclose personal information about you to government and regulatory authorities where required by law or for the purposes of processing and settling claims.

#### **How do we protect your personal information?**

1. We will take all reasonable safeguards that are necessary to protect your personal information, including the following:
  - i. We limit access to your personal information to only selected employees in our organization. All personal information is to be kept confidential and each employee must sign an oath of confidentiality on an annual basis.
  - ii. Our computer systems are designed to prevent unauthorized access.
2. We will protect the confidentiality of your personal information when dealing with other persons and organizations by ensuring that they are bound, as appropriate, to maintain your confidentiality and not use your personal information for any unauthorized purpose.
3. We will retain your personal information only as long as it is reasonably required. The retention period may extend beyond the end of your relationship with us but only for so long as it is legally necessary for us to have sufficient information to respond to any issues that may arise at a later date. When your personal information is no longer needed, we have procedures to destroy, delete, erase and convert it to an anonymous form.

#### **How do we keep your information accurate?**

We will make every reasonable effort to keep your personal information accurate and up-to-date. At any time you may advise us of changes in the personal information we have about you in our files so that your information can be updated. Your personal information should be as accurate, complete and up-to-date as possible in order for us to provide you with the best possible service. We will make appropriate corrections and make sure they are conveyed to anyone we may have misinformed. For information that remains in dispute, we will note your opinion on our file.

#### **How may you access your information?**

At your request, we will confirm the nature of your personal information that has been collected, the purpose for which it is being used, to whom it is being disclosed, and how long it will be retained. When making such requests, you will be asked to provide proof of identity, and you must be specific about the type of information you are requesting. We will respond to your request within 30 days. Wherever possible, we will give you access to your information and you may review its accuracy. In limited situations, we may not be able to provide you with access to the information (for example, where the information cannot be disclosed for legal reasons, or where release of the information would affect another person's right to privacy.) When information is not easily accessible, we may charge a reasonable retrieval fee.

#### **How may you withdraw your consent?**

We will collect, use, disclose and retain personal information for the purposes as described in this Privacy Code. However, you have the choice to withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice. You may do so by contacting our offices. Our staff will be pleased to explain your options and any consequences of refusing or withdrawing your consent. Be aware that in certain circumstances, withdrawing your consent may limit or restrict our ability to process and settle your claims, or provide service.

**How do you make privacy related inquiries?**

By becoming insured under a BHL plan or policy, by making a claim for benefits, or by requesting services, you agree to allow your personal information to be collected, used, retained and disclosed as outlined above. However, if you have questions about privacy or confidentiality, or any concern about the way your personal information is being handled, please contact our Privacy Officer at the address listed below:

Corporate Privacy Officer  
Bryan H. Lupe and Associates Limited  
200-701 Pembina Hwy  
Winnipeg, MB R3M 2L7

In your letter, please describe your questions or concerns in as much detail as possible. We will investigate the matter promptly and will respond to you within 30 days after receiving your letter.

If the issue is not resolved to your satisfaction, you may file a complaint in writing to:

Officer of the Privacy Commissioner of Canada  
112 Kent Street  
Ottawa, Ontario K1A 1H3