

IDC WIN PRIVACY POLICY

Our Commitment to our Advisors, our insurance suppliers and your customers: In order to provide Advisors and their customers with access to insurance products and services, we collect certain personal information about both, generally on behalf of our insurance providers. Our commitment goes beyond meeting legal requirements for protecting personal information. The trust and confidence that our Advisors and insurers hold in us, including our ability to protect the confidentiality of personal information and the privacy of the individuals who provide it, are critical to our success as a business. This Policy applies to our employees and any third party service providers or representatives with which we contract.

Why we collect, use and retain personal information:

We act as an intermediary between insurance brokers and AGAs and the insurance companies with which they do business, providing administrative and marketing services pursuant to written contracts. Insurers' privacy policies typically identify us as "service providers." Insurers require us to obtain, use and retain certain essential personal information about Advisors in order to determine their initial and ongoing suitability to act as an Advisor, to obtain contracts for them to distribute products and in order to compensate them. This information includes financial and work history as well as disciplinary, legal and regulatory information.

We obtain insurers' customer information from Advisors in order to provide services and access to insurers' products. Our policies must meet the standards insurers establish in their own privacy policies. The personal information Advisors collect from customers and provide to us for submission to insurers is essential information that we use to provide administrative services to insurers, which in turn require this same information to provide services and products that customers have requested. This information is used to determine insurance risk, assess eligibility for products, to administer those products once purchased and to fulfill certain regulatory requirements. This can include health information, financial information and history and information about avocations. We retain some of this information in order to be able to administer business, provide ongoing service to Advisors and insurers and when we are required to do so by law.

We may use anonymous data to manage our business, identify products and services that will benefit Advisors and their customers and to prepare reports about our business.

Limiting collection:

We collect only the information we need to fulfill our contracts with Advisors and insurers and to meet our regulatory obligations. We will use only fair and lawful means to collect this information. We rely on insurers and Advisors to obtain consent for sharing information with us and for our retention of that information.

How we collect customers' information:

Wherever possible, we collect customers' information directly from the Advisor as their authorized representative. Information may be obtained through government agencies, other insurers and financial institutions. We may collect any required health information about customers from the Advisor or directly from the customer. Third party service providers and other authorized representatives may also collect this

information on our behalf. We will collect the Advisor's personal information directly from the Advisor, other insurers and insurance organizations, government agencies and existing and past employers.

Consent:

We will collect information only with consent, express or implied. The customer consent that insurers receive generally includes consent to provide personal information to us, which allows us to fulfill our contractual obligations to the insurer. We also operate under the customer consent that Advisors receive in order to support their sales activities. We may rely on implied customer consent when an Advisor receives a customer's consent to collect personal information in connection with a purchase or policy change and when we process customer information requested by an insurer and collected by an Advisor. We receive express Advisor consent to obtain their personal information in the course of screening and contracting.

When an Advisor or customer requests or uses any of the products or services we make available, we will transfer whatever information is necessary by implied consent. If we receive notice from an insurer that an Advisor or customer has withdrawn consent for the continued use and retention of personal information, we will take whatever steps are necessary to adhere to the Act. This may require termination of our relationship with the Advisor. We will act on whatever instructions we receive from the insurer regarding the customer's status.

Limits on use and disclosure:

We will use and disclose personal information to perform our contractual duties, to provide you with information and when we are required to do so by law. We may disclose this personal information to our employees or service providers so that they can perform their duties, to insurers and any person or organization to which consent has been given and where authorized by law. Where personal information is provided to service providers, we require them to protect that information consistent with our policies and practices.

We may also use personal information to offer products and services that we believe will interest Advisors or customers but we will never give or sell personal information to third parties for marketing purposes.

Limits on retention of information:

We will retain personal information in our records for as long as it is needed for the purposes identified, or as legally required or permitted.

Accuracy of information:

It is the Advisor's responsibility to keep personal information about the Advisor and customer as accurate and up-to-date as possible. Both the insurer and the Advisor are responsible for providing us with notices of changes that they receive directly. An individual may challenge the completeness and accuracy of his/her personal information that we hold. We will make any necessary corrections to information about an Advisor that is shown to be incomplete or inaccurate and we will notify any third parties, including insurers, if we make such corrections.

Customers may gain access to their personal information we hold by making an access request to the Advisor and/or insurer on whose behalf we hold the information. In situations where a customer seeks corrections to information we hold, we will act on the instructions of the insurer(s) whose products are held and/or the Advisor who is your authorized representative, depending on the corrections required. Any disagreement or discrepancy regarding accuracy will be documented.

Protecting personal information:

We will protect personal information from unauthorized access or use by ensuring that safeguards are in place, including physical security measures for our locations, operational policies, procedures and access protocols and technological measures for our computer systems. We will use safeguards to prevent unauthorized access to personal information during the destruction process.

Contact Us: If you have any questions or concerns regarding this Policy or how we manage your personal information, please contact our Privacy Compliance Officer. Please note that a complaint should be directed in writing. We will not respond to complaints via email.

Name	<u>Eric Wachtel</u>
Address	<u>5705 Cancross Court, Suite 200, Miss, ON L5R 3E9</u>
Phone	<u>905 366 3866 Ext 3228</u>
Fax	<u>905 366 3877</u>
Email	<u>ewachtel@idcwin.ca</u>

Contact the Privacy Commissioner of Canada: The Commissioner encourages individuals to attempt to discuss concerns directly with the organization first. Hours of service are from 8:30 a.m. to 4:30 p.m.

Toll-free: 1-800-282-1376

Phone: (613) 947-1698

Fax: (613) 947-6850

TTY: (613) 992-9190