

# Policy: Access to Personal Information (Canada)

REVISION DATE: OCTOBER 9, 2016

St. Paul Fire and Marine Insurance Company, Travelers Insurance Company of Canada and The Dominion of Canada General Insurance Company (collectively "Travelers Canada") understand the importance of protecting the privacy of clients and place a high priority on effectively dealing with any privacy related requests. This Access to Personal Information Policy addresses how Travelers Canada will meet its obligations under our Privacy Policy and the law with respect to permitting access to personal information. All privacy related access requests will be treated seriously, dealt with promptly and handled in a confidential manner.

This procedure will apply to a client seeking access to review his or her own personal information. This procedure also applies to others, including law enforcement authorities, seeking to access information on a client.

To make an access request, the following procedure may be followed, or as appropriate, will apply:

The Applicant must contact the Privacy Officer for Travelers Canada in writing and request access to the personal information. The request for access will be retained and recorded by the Privacy Officer. The Privacy Officer will send an acknowledgement by letter to the Applicant of receipt of the request stating the date of receipt, within 15 days following the date of receipt of the access request, and confirm that the access request is being processed. Travelers Canada will respond to the request within 30 days.

The Privacy Officer will determine if the request for access is legitimate and not frivolous or vexatious. The Privacy Officer may require further information to allow him or her to make this determination. If the Privacy Officer determines that the request for access is not legitimate, or the Applicant is not authorized to make the request, he or she will:

- a) decline to permit access to the file;
- b) document why;
- c) state the reason for declining access in the file;
- d) inform the Applicant in writing, as to the reason for declining access; and
- e) provide the available resources to challenge the decision.

In permitting access to personal information, the Privacy Officer will first examine the file to make a copy of the contents to be disclosed. Travelers Canada will take steps to authenticate the identity of the customer prior to providing access and will set out the authentication procedure used in the file. Travelers Canada may charge a reasonable fee to comply with an access request as permitted by law.

The Privacy Officer shall not disclose any information that:

- a) identifies third parties unless
  - (i) on the face of the document containing the information, there is a consent by the third party to the release of his/her name in connection with the information in question; or
  - (ii) it is possible to sever any information identifying a third party, in which case the Privacy Officer will provide the customer with access to the remaining information; or
- b) falls within an exception to disclosure indicated in the Travelers Canada's Privacy Policy or by applicable law.

Access to personal information may take place in one of two ways:

- a) in person; or b)  
by mail or fax.

If an "in person" access is requested, the Privacy Officer will schedule an appointment during regular business hours. The appointment will be scheduled as soon as is reasonable.

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“In person” access will be done in the presence of the Privacy Officer or a person designated by the Privacy Officer and the following rules will apply to the Applicant:

- a) you may only access your own file;
- b) you may take notes on the contents of your file;
- c) you may request the Privacy Officer to make copies of documents to be released;
- d) you may not remove any of the contents of your file;
- e) you must confirm the completion of your inspection in writing, and the date and time of your inspection; f) you may submit written comments concerning any information you deem inappropriate or inaccurate, for insertion in your file. Comments may be submitted at the time of inspection or at a later time;
- g) the Privacy Officer will
  - (i) provide the Applicant with a reasonably specific account of third parties to whom information has been disclosed including a list of entities to which information may have been disclosed; and
  - (ii) advise the Applicant of the source of information included in the file; and
- (h) in the event the Privacy Officer determines that the record of your Personal Information is inaccurate or incomplete, he or she will correct the information and make a notation in the file as to the date and nature of the correction.

If an “in person” access is not chosen, the following rules will apply to the Applicant and the Privacy Officer will:

- a) make copies of documents that will be released;
- b) mail or, if requested, fax or electronically transmit copies of the documents to be released;
- c) insert a note in the file listing the documents transmitted indicating the date and method of transmission of documents and the place of inspection.
- d) provide a reasonably specific account of third parties to whom information has been disclosed including a list of entities to which information may have been disclosed; and
- e) advise the Applicant of the source of information included in the file.

Once the Applicant has received the information from the Privacy Officer, the Applicant may then submit written comments to the Privacy Officer concerning any information he or she considers inaccurate or incomplete for insertion in the file. The Privacy Officer will place these comments in the file.

You may contact Travelers Canada’s Privacy Officer at:

165 University Avenue  
Toronto, Ontario M5H 3B9  
Tel: 416.362.7231 or 1.800.268.8447  
[privacy\\_officer@travelers.com](mailto:privacy_officer@travelers.com)

**Travelers Canada will also comply with any and all requirements to notify a government institution of an access request respecting any disclosure of information to such government institution or in response to a subpoena or similar order.**