

ARC Group Benefits Inc. Privacy Policy

The collection, use and disclosure of personal information are essential in the conduct of our business as a financial services brokerage firm and as a provider of third-party administrative services. At ARC Group Benefits Inc. (hereinafter referred to as "ARC"), we acknowledge the importance of protection of personal information entrusted to us and respect of privacy. We take this responsibility very seriously and as such, we follow the *Act respecting the protection of Personal Information in the Private Sector* as well as the **ten principles of confidentiality** based on the *Personal Information Protection and Electronic Documents Act* of the Federal Government.

1. Accountability

We take responsibility for the personal information entrusted to us, including information obtained from a third party or transferred to a third party for processing. We have a designated person who ensures compliance with this policy and with the laws, applicable privacy regulations and guidelines. ARC works in concert with persons responsible for specific sectors of activity and who are particularly familiar with the protection of personal information of each sector. In doing so, we can ensure that access to personal information is restricted to those who need it to provide various services to you and your organization. It also ensures that the latter, directors, officers, employees, licensed representatives and any other person or organization acting for ARC or on its behalf, are responsible for the protection of your personal information.

We ensure that the suppliers with whom we do business and who must collect, use, or communicate personal information do so only for authorized purposes and in a manner that complies with the applicable Standards and Laws in Canada.

2. Identifying the Purposes of Information Collection

We will specify how we intend to use the provided personal information at the time of its collection or before. This clarification may be communicated in writing or verbally, depending on how the information is collected. Individuals collecting personal information must be able to explain why the information is being collected. We will collect, use, and disclose only the information we need for the purposes identified at the time of collection. As a broker and administrator of group benefits or pension plans, we use personal information to:

- Communicate with you;
- Confirm your identity and update your information;
- Determine eligibility for the products, services or coverage requested;
- Provide, administer and service any products or protection held with us. We use it, among other things, to investigate, assess claims, pay benefits, and to create and maintain records about our business relationship;
- Perform internal data management and analysis;
- Understand the needs of our customers and make recommendations for services and products;
- If your information is collected over the phone, the call may be recorded or monitored for the following purposes:
 - Establish a record of the information you provide;
 - Receive or verify instructions received by you;
 - Maintain quality service levels;
 - Train our employees.

3. Consent

We collect, use, and disclose your personal information with your consent for the identified purposes, or as permitted or required by law. We may collect your consent in different ways. It may be expressed in writing or be implied, provided verbally, electronically or through an authorized representative. Consent may be implied where the information is not very confidential and consent to its collection, use or disclosure can reasonably be implied. Your consent is also implied or inferred in certain situations. For example, if you present your benefits card to a pharmacy instead of paying for the prescription directly, you consent to the pharmacy providing us with your personal information to pay the claim.

In limited circumstances, personal information may be collected, used, or disclosed without the individual's knowledge or consent. For legal, medical or security reasons, it may be impossible or impractical to obtain consent. These circumstances include but are not limited to: information collected as part of an investigation into a possible breach of contract, for the purposes of fraud prevention or detection or criminal law enforcement, or if the solicitation of consent defeats the purpose of information gathering.

Subject to legal or contractual restrictions, your consent may be withdrawn at any time. However, withdrawing your consent may affect our ability to continue to provide you with the products or services you have requested. We will explain to the person the possible consequences of withdrawing their consent, such as the termination of their contract, the cessation of their benefits or the inability to process their claims.

You can withdraw your consent to receive information about other products and services offered by ARC.

4. Limitations applicable to the collection of personal information

We will collect personal information with discretion. The amount and nature of the information collected will be limited to information deemed reasonably necessary for the purposes identified. The personal information we collect comes from applications and other forms collected directly from participants, through an employer or authorized representative. We may also collect your personal information from health care providers, clinics, or insurance companies.

The personal information we collect about you may include, but is not limited to:

- Identifying information, such as first name, last name, gender, marital status, dependents, and their personal information (first name, last name, date of birth, gender, student status), home address, phone number, email address, date of birth.
- Financial and professional information, such as place of employment, position held, annual income and banking information;
- Medical information, such as name of health care provider, medical history, or family medical history.

Personal information does not include an employee's name, title, business address, business telephone number, business fax number or business email address.

We collect your personal information in different ways:

- A completed and signed membership application;
- A claim request submitted via the mobile application or the employee portal;
- During our communications with you, in writing or by telephone;
- Other sources which may include but are not limited to:
 - Your authorized advisor or representative;
 - The employer of an insured;
 - Service providers we work with to issue and manage our products and services, whether now or in the future;
 - From public sources such as a government agency or website.

If you do not want your calls recorded, you may contact us in writing. You may also request that we respond to you in writing only.

5. Limitations on Use, Disclosure and Retention of Personal Information

We will use or disclose personal information only for the purposes for which it was collected unless the individual consents to its use or disclosure for other purposes. Personal information will be retained only as long as necessary for the purposes specified. We will never sell your personal information to third parties.

We may share your personal information with another company to assess or service a claim. We share personal information only with those who require it. These entities may include:

- Our service providers;
- The insurance companies with which you have coverage;

- Suppliers who need this information to provide their services or products to us. Examples of services include data storage, insurance companies, financial institutions, affiliates, and other healthcare organizations we work with;
- Individuals, organizations, and investigative bodies working to prevent, detect or investigate suspected fraud, breach of agreement or violation of law;
- Any entity in the event of a merger or change of control of ARC Group Benefits Inc., in whole or in part, and only if the parties enter into an agreement that the collection, use and disclosure of information is limited to the purposes of commercial transaction and comply with applicable laws.

ARC may work with service providers outside of Canada. Your personal information will then be subject to the laws that apply in those countries, including freedom of information laws.

6. Accuracy of Personal Information

The use of the information will determine how important it is to keep the personal information up to date, while considering the interests of the individual. The information will be sufficiently accurate, complete, and up to date to minimize the risk that a decision relating to an individual will be based on inappropriate information. You have the right to ask us to change or correct the information we have collected about you. If your personal information is inaccurate or incomplete, we will make the necessary changes. Depending on the nature of the disputed changes, the modification may take the form of a correction, addition, or deletion of information.

7. Protection of Personal Information

Personal information will be protected by security measures proportionate to its degree of confidentiality. Technical and organizational means are implemented for protection against inappropriate access, theft, reproduction, use or communication.

This means include:

- Organization, through our policies, practices, and access levels (security permissions and limiting access on a need-to-know basis)
- Technologically, using passwords, encryption, firewalls, antivirus, and anonymization software
- Physically, using building security measures and physical barriers

All staff are regularly trained on the rules to be observed and are required to respect a code of conduct. Our service providers are also required to protect their systems against unauthorized access and to apply security standards.

8. Accessibility to information on practices and policies

We will make readily available to individuals' specific information about its policies and practices relating to the management of personal information. Upon written request, we will respond to questions about our practices with respect to the management of personal information. You may contact our Privacy Officer with any inquiries or complaints.

9. Accessibility to personal information

Upon request, we will confirm whether personal information is held about you, how to access it, and provide you with a description of its intended uses, including disclosure to third parties (if applicable).

10. Complaint Resolution

A person may file a complaint about any breach of this policy to our Privacy Officer. Those who inquire will be made aware of the applicable complaints handling protocol. Any complaint will be studied with rigor according to the complaint handling policy and the appropriate measures will be taken if we deem the complaint to be justified.

All questions, inquiries or requests relating to the protection of personal information must be made to the person designated as our **Privacy Officer**, whose contact information is as follows:

Catherine-Julie Vezina
Director of Operations
ARC Group Benefits Inc.
261 Saint-Jacques Street, 3rd floor
Montreal (Quebec) H2M 1Y6
Telephone: 514-357-2534
Email: cvezina@arcsupport.ca

This policy may be changed or updated at any time, with or without notice.

Date of last update: October 2022