

Privacy Notice

Cigna Life Insurance Company of Canada



The privacy and protection of the personal information of our clients and customers is important to Cigna Life Insurance Company of Canada (“Cigna”, “we”, “us” or “our”). The collection and use of personal information is fundamental to our day-to-day operations as a health services provider. Read this privacy notice to understand what information we collect from you, and how we collect, use and protect it.

This privacy notice includes additional details about our practices and your privacy rights in Canada. In addition to this privacy notice, some of our products and services have their own privacy notices. For example, the Cigna Online Privacy Notice describes in more detail how your personal information is collected and used for web and mobile services. Our privacy notices are available to view here: <https://www.cigna.com/legal/compliance/privacy-notices>. Combined, these policies and notices describe our commitment to the protection of personal information.

Personal Information

“Personal Information” is information that relates to you as an individual and allows you, or other individuals such as your spouse, or dependent(s) to be identified. Your Personal Information may be provided to us by you or by a third party such as your healthcare provider or your employer or group plan sponsor. Due to the nature of the services we provide to you, your Personal Information may contain sensitive data including, but not limited to, your medical condition and health status.

The Personal Information we collect may include:

- **Personal Details and Contact Information:** name, address, e-mail and telephone details, gender, marital status, familial status, date and place of birth, nationality, government-issued identification number

- (Social Insurance Number or national insurance number), tax identification number, military identification number, passport number, passwords, educational background, physical attributes, photos, employment information, date and cause of death, injury, other medical condition or disability, and any other personal information that may be collected as part of a product or service application or pursuant to the submission of a claim for benefits or services (e.g., personal habits, such as smoking, diet, stress factors, sleep habits, exercise habits, consumption of alcohol).
- **Financial Information:** payment card number, bank account number and account details, salary, assets and income, personal bankruptcy, credit history.

Global Health Benefits

All sources and disclosures are at the end of this document.

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Offered by Cigna Life Insurance Company of Canada.

- **Insurance Contract and Eligibility Information:** member number or customer ID number; actual or proposed coverage start and end dates, travel arrangements and reservation numbers, age categories and genders of individuals to be insured, policy number, coverage/peril details, cause of loss, prior medical, accident or loss history and other insurance coverage.
- **Marketing Preferences and Customer Service Interactions:** marketing and advertising preferences; entry in contest or promotion; responses to voluntary surveys; and recordings of telephone calls with customer service and other representatives.
- **User and Device Information:** IP address, user ID and other device information (such as hardware model, operating system version, unique device identifiers and mobile network information) and any other user information collected through use of websites or applications owned by Cigna and/or any other third party.
- **Health information:** current or former physical, mental or medical condition, disability information or health status, procedures performed, prescription information, and genetic information, medical claim history, and any sensitive data necessary to provide services, to administer claims for benefits, and for pricing and financial risk analysis.

We collect Personal Information from:

- You directly, or from your authorized personal representative;
- Healthcare providers;
- Authorized Administrators, defined below, including Cigna affiliates;
- Third parties as required to provide services to you, such as independent agents/brokers, another insurer, medical experts, etc.;
- Your employer or group plan sponsor (as applicable);
- Fraud prevention and detection databases and sanctions screening tools; and
- Public sources, such as government agencies and websites.

Collection and Use of Personal Information

We collect and use Personal Information as necessary to provide life and health services and group insurance benefits. These purposes may include communications and customer service, contract and benefit plan administration, eligibility and enrollment, claim processing, underwriting and pricing, operating information technology, billing, risk management, performing quality reviews, auditing, marketing, consulting, record keeping, reporting, and complying with laws and company policies.

We use Personal Information in accordance with our privacy policies, our contractual rights and our obligations under applicable Federal and Provincial laws. We collect information as necessary for the effective conduct of our business. Cigna uses fair and lawful means to collect Personal Information.

Sometimes Personal Information we collect may be used to identify individuals who are most likely to find a Cigna product or service of interest. When that is the case, we will state our intention to use Personal Information for such a purpose at or before the collection and will provide individuals with a method of declining such use.

We may use Personal Information that is anonymized or de-identified to determine the effectiveness of a given marketing campaign and for certain operational and insurance purposes.

We may use technologies that use Personal Information to perform certain services, including the use of automated decision-making technology. You may request additional information about our use of automated decision-making technology, including the Personal Information used and the factors that led to the decision. You have the right to correct any incorrect Personal Information used to make the decision.

Consent

We collect, use and disclose Personal Information with your consent consistent with the purposes we identify to you or as otherwise permitted by law. Your consent may be express, when you agree in writing, verbally or with an electronic signature on an application or form. We rely on your implied consent to use your Personal Information for certain purposes based on disclosures in our Privacy Notices and in the course of providing services to you. Exceptions to consent may also be based on legal, health and/or security reasons.

Cigna will not provide sensitive information (i.e., medical information related to you) to your employer without asking for your express consent from you unless the disclosure is permitted by applicable laws.

Where the individual is a minor, Cigna will require the consent be provided by the person having parental or guardian authority.

You may decline or revoke consent to the collection, use or disclosure of your Personal Information subject to legal and contractual restrictions. However, we may be unable to provide you with the products or services without your consent.

Disclosure of Personal Information

Depending on the product or service, we may disclose your personal information to:

- An affiliated company, third-party administrator, independent agent or broker, reinsurer, or subcontractor (collectively, "Authorized Administrator") to perform certain functions in support of our products and services.
- Authorized employees to the extent necessary for the performance of their responsibilities.
- A person or entity that you designate by providing your express consent and authorization.
- People, organizations, and investigative bodies who work to prevent, detect or investigate suspected fraud, breaches of agreement, or contravention of law to the extent permitted by applicable law.
- Those persons or entities authorized by applicable law.

Cigna obligates its employees and Authorized Administrators to use and take steps to protect Personal Information in accordance with the requirements of this privacy notice.

Your Personal Information may be collected, used, processed, disclosed and stored outside of the province of Quebec and outside of Canada. These locations may include the United States, India, the Philippines, the United Kingdom and countries in which you travel or reside while utilizing our products and services. The information may be accessible to the governments, courts, law enforcement and/or regulatory agencies through the laws of other countries.

Protection of Personal Information

Cigna has established data privacy and security safeguards for protecting Personal Information in our possession to match the sensitivity of the information, the purposes for which information is to be used and the medium on which it is stored. We have designated a Privacy Officer responsible for privacy compliance and the protection of personal information.

Cigna employees are prohibited from using Personal Information for a purpose other than as required in the performance of their employment duties. Our employees are regularly trained on our standards for information handling. We secure Personal Information in our offices and on our systems.

Our employees, Authorized Administrators and representatives are required by us to protect the confidentiality of your Personal Information in a manner that is consistent with Cigna's commitment to privacy and applicable laws. We obligate our Authorized Administrators, within and outside of Canada, to act in accordance with Cigna's and insurance industry standards and guidelines for the use and protection of Personal Information.

We retain Personal Information for as long as is required by our records retention policy and applicable laws.

Your Right to Access Personal Information

You, or persons authorized in writing by you to act on your behalf, may make requests about your Personal Information in the possession of Cigna and its Authorized Administrators, such as the following requests:

- Confirm the existence of Personal Information;
- Access to or a copy of the Personal Information;
- Identification of the source of Personal Information, or a description of how the Personal Information has been used or disclosed;

In some circumstances, the exercise of a right to erasure or right to cease dissemination or processing will mean that we are unable to continue providing services to you. This may result in the termination of your insurance benefits or services.

Your right to access is not absolute. For example, you do not have a right to access, and we may decline your request for access, if the information requested is subject to a legal privilege.

We may not be able to provide the individual with all the medical information requested, depending on the circumstances. There are instances when we obtain medical information through the individual's health care professional, and we may need to provide access to this information only through their physician.

We may charge a reasonable fee in advance for copying and sending the information requested. If this happens, we will inform you in advance with the approximate amount.

We strive to keep the Personal Information in our possession accurate and complete. However, we rely primarily on others, including individuals, employers, plan sponsors, brokers and healthcare providers, to provide us with accurate information, disclose all material information and to inform us of any changes. An individual can request to access their Personal Information and ask for a correction, update or amendment of any information that is inaccurate.

Questions?



Questions with respect to this privacy notice or requests about your Personal Information should be directed to the Canada Privacy Officer by e-mail to OmbudsmanCLICCanada@Cigna.com



or in writing by mail to:

Cigna Life Insurance Company of Canada
Attention: Canada Privacy Officer
100 Consilium Place Suite
301 Scarborough, ON
MIH 3E3

