



## Cigna and Individual Privacy

The privacy and protection of personal information is important to Cigna Life Insurance Company of Canada, Life Insurance Company of North America and each of their affiliates and subsidiaries (collectively “Cigna” “we” or “us”). As a provider of financial services, the collection and use of personal information is fundamental to Cigna’s day-to-day operations.

### 1. Consent and Personal Information

Personal information is information that identifies an individual. For example: an individual’s name, birth date, address, age, health and financial information is personal information which Cigna may collect, use and in certain circumstances where necessary, disclose in the course of providing insurance services and carrying on business. Cigna obtains consent to the collection, use and disclosure of personal information, except where inappropriate.

In many circumstances, an individual’s consent to the collection, use and disclosure of personal information is required as a condition of obtaining Cigna’s insurance products. Where that is the case, the individual may decline to or revoke consent to the collection of their personal information and Cigna is entitled to decline or cease to provide insurance services to that person.

Sometimes personal information collected for the main purpose of providing an insurance product may also be used for the secondary purpose of identifying individuals who are most likely to find a Cigna product or service of interest. When that is the case, Cigna will state its intention to use personal information for such a secondary purpose at or before the collection and Cigna will provide individuals with an easy and inexpensive method of declining the secondary use of their personal information.

### 2. Collecting Personal Information

In obtaining the consent to collect personal information, Cigna identifies the purpose for which it is collected before or at the time the information is collected. When we do collect personal information, we collect personal information only which is necessary and also consistent with this stated purpose. We only collect information which is pertinent to the effective conduct of Cigna’s business. Cigna uses only fair and lawful means to collect personal information. Whenever practical, we collect information directly from the individual concerned. In some instances and as is common in insurance, we verify and obtain information from independent sources or organizations.

### 3. Using Personal Information

We use personal information in accordance with the consent provided by the individual to whom the information relates, in accordance with this privacy policy, our contractual rights and obligations with applicable laws issued by Federal and Provincial regulators.

Personal information shall not be used by Cigna employees and representatives for purposes other than as required in the performance of their employment duties.

Cigna is in the business of providing insurance protection to individuals. Individuals may choose not to receive offers of additional products and services made to them by Cigna and if they make such a request to Cigna, we will use our best efforts to honor that request. In addition, aggregated information may be used, which is not identifiable to an individual, to determine the effectiveness of a given marketing campaign.

### 4. Accuracy of Your Personal Information

Cigna will do its best to ensure that personal information is accurate information; however, we rely on individuals to disclose all material information and to inform us of any changes. An individual can request to access their personal information and ask for correction of any information that is inaccurate.

Cigna retains personal information only for so long as is required pursuant to its records retention policy and the law.

### 5. Personal information will be protected by appropriate safeguards

When we receive personal information from an individual who applies for an insurance product from Cigna, we establish a financial services file for the purpose of providing financial products and insurance services. The file is kept in Cigna’s offices or those of its authorized administrators.

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. Cigna will establish appropriate information security safeguards for the purpose of protecting personal information in its possession. Cigna will take precautions to secure personal information in its offices, on its systems and with service providers in and outside of Canada by having signed outsourcing agreements and in accordance with standards in the insurance industry or as is appropriate given the sensitivity of the personal information. Cigna employees will familiarize themselves with Cigna’s standards for information handling.

## 6. Disclosure of Personal Information

Personal information will only be accessible to Cigna employees and representatives and those of Cigna's authorized administrators, who require access in the performance of their duties. Personal information will only be disclosed to others with consent or to any person authorized by the individual to whom the personal information relates, and to those persons authorized by law. Your personal information may be processed and stored in the United States and may be accessible to the United States government, courts or law enforcement or regulatory agencies through the laws of the United States.

## Your Personal Information and Cigna's Related Companies and Authorized Administrators.

Cigna Life Insurance Company of Canada, Life Insurance Company of North America and each of their affiliated companies provide a variety of financial products and services. Cigna sometimes retains an affiliated company or an independent third party administrator or reinsurer ("authorized administrator") to perform on Cigna's behalf, certain functions in support of the products and services Cigna provides. Such functions could include the underwriting, offering or administering of Cigna's financial products and services or any claims related thereto. Accordingly, in certain instances these affiliates or authorized administrators will be provided with personal information to the extent that it is necessary in the performance of those specific reinsurance, underwriting, marketing, consulting, administrative, rehabilitative, claims, investigation or insurance related services. Cigna obligates its affiliates and authorized administrators to use and take steps to protect personal information in accordance with the requirements of this privacy policy.

## 7. Access to Your Personal Information

Individuals with a right of access, or persons authorized in writing to act on their behalf may, with satisfactory identification and proof of entitlement, request access or, if applicable, request a correction of the personal information which Cigna has in its possession.

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 do not provide medical information directly to the individual unless the individual provided it directly to us. Instead we provide access to medical information through the individual's health care professional.

We may charge a reasonable fee in advance for copying and sending the information requested.

Questions with respect to the privacy of personal information or requests to access or correct personal information should be directed to: **Privacy Officer**

**Cigna Life Insurance Company of Canada  
100 Consilium Place Suite 301  
Scarborough, ON M1H 3E3**

**Toll Free: 1.800.668.7029, ext. 2792066**



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