



About your privacy

At Aon, your privacy is, and always has been, very important to us. We are dedicated to providing you with superior service while protecting your privacy and safeguarding your personal information.

“Personal Information” is defined in Canada’s *Personal Information Protection and Electronic Documents Act* (‘PIPEDA’) as information about an identifiable individual, though it does not include the name, business title, business address or business telephone number of employees of organizations.

Our ten privacy principles

Aon is committed to maintaining the accuracy, confidentiality and security of your personal information. As part of this commitment, Aon has adopted the following ten principles, based on the values set by the Canadian Standards Association’s *Model Code for the Protection of Personal Information* and Canada’s PIPEDA.

1. Accountability

Each Aon company in Canada is responsible for maintaining and protecting the personal information under its control and shall designate one or more individuals to be accountable for that company’s compliance with these principles.

2. Identifying Purposes

The purposes for which personal information is collected shall be identified before or at the time the personal information is collected.

3. Consent

Individual’s consent will be obtained for the collection, use or disclosure of personal information, except where the law provides an exemption.

4. Limiting Collection

The personal information we collect shall be limited only to that which is necessary for the purposes identified.

5. Limiting Use, Disclosure and Retention

Personal information shall only be used or disclosed for the purposes for which it was collected, unless an individual has otherwise consented or when it is required or permitted by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

6. Accuracy

We shall take care to keep personal information as accurate, complete and up-to-date as may be necessary to fulfill the purposes for which it is to be used.

7. Safeguards

We shall protect personal information using security safeguards that are appropriate to the sensitivity level of the personal information received.



8. Openness

Aon will provide information to individuals about our policies and procedures relating to the management of personal information that is under our control.

9. Individual's Access

On written request to our Privacy Officer, an individual will be informed of the existence, use and disclosure of their personal information that is under our control, and may be given access to that personal information as required and permitted by law. Individuals are entitled to challenge the accuracy and completeness of that personal information and request that it be amended, if appropriate.

10. Handling Enquiries or Complaints

Any questions or enquiries concerning compliance with our privacy policies and procedures may be addressed to our Privacy Officer, as set out below.

Why we collect and use personal information

Collecting personal information about you is essential to our being able to provide the products and services that best meet the needs of both yourself and/or authorized third parties ("Client"). While the personal information we collect may come directly from you, it may also be provided by our affiliates or other third parties (such as employers, insurance companies, insurance brokers or agents, credit organizations, motor vehicle and driver licensing authorities, financial institutions, medical professionals, etc.).

Personal information may be used for the following purposes:

- To determine eligibility and process applications for products and services and to provide information and services as requested by Clients
- To understand and assess Clients' ongoing needs and offer products and services to meet those needs
- For Client communication, service, billing and administration
- For claims administration and data analysis
- To comply with legal, audit, security and regulatory requirements
- To obtain and update credit information with appropriate third parties, such as credit reporting agencies, where transactions are made on credit

Personal information may also be used for other purposes, subject to obtaining your prior consent for such use.

Consent to use personal information

Consent may be obtained in various ways. We may obtain your express consent or we may determine that consent has been implied by the circumstances. Express consent can be verbal (in person or over the telephone), written or by electronic application (including email). Implied consent occurs when we can assume you have given consent by some other action you take or decide not to take. For example, if you request a specific product or service and provide us personal information in that regard, we infer that you consent to us using that personal information reasonably to provide this service.



If you need to provide personal information about other individuals (such as employees, dependants, etc.), you must obtain their consent for these purposes prior to your disclosure to us.

Providing us with your personal information is always your choice. When you request services from us, we ask that you provide information that enables us to respond to your request. In doing so, you consent to our collection, use and disclosure to appropriate third parties of such personal information for these purposes. You also authorize us to use and retain this personal information for as long as it may be required for the purposes described above. Your consent remains valid even after the termination of our relationship with you, unless you provide us with written notice that such consent is withdrawn. You should note that by withdrawing your consent, or not providing it in the first place, you may limit or even prevent us from being able to provide you or an authorized third party (such as an employer) with the products or services desired.

In certain circumstances, consent cannot be withdrawn, such as where personal information is required for policy issuance or renewal, insurance underwriting or claims administration of existing policies. Additionally in certain circumstances, we will not need to obtain consent or explain the purposes for the collection, use or disclosure of personal information. For example, this exception would apply if there is an emergency that threatens the life, health or security of an individual, or if we must comply with a court order.

Sharing personal information with others

We do not sell client lists or personal information to others. Aon only discloses personal information as is required and described in this Policy or as otherwise required by law. In providing our services, we may need to disclose the personal information we collect to affiliates, subsidiaries, successors and other service providers or agents who perform various functions for us. Such parties may be located in Canada, or in other jurisdictions outside of Canada*. While your personal information is always subject to confidentiality obligations, while stored in another jurisdiction, it may be subject to the laws of that jurisdiction.

As Aon continues to develop and grow, we may buy or sell parts of a business. As our businesses consist primarily of client relationships, information regarding the particular accounts or services being purchased or sold could include personal information and be one of the transferred business assets.

We may also use this personal information to assess your future needs and to offer the products and services that may best meet those needs, from ourselves, our affiliates or reputable organizations selected by us. If you do not wish to receive these offers or such information, please contact our Privacy Officer as outlined below in the **Contact Information** section.

Keeping information accurate

It is important that your personal information is accurate and complete. Having accurate information about you enables us to give you the best possible service. You have the right to access, verify and amend the information we have about you. If you identify any personal information that is out-of-date, incorrect or incomplete, let us know and we will make the corrections promptly. To keep personal information up-to-date, please inform us of any changes, such as a change of address, telephone number or any other circumstances by contacting your local office representative.



How we safeguard personal information

At Aon, we employ physical, electronic and procedural safeguards to protect our systems and all personal information under our control against unauthorized access and use. All safety and security measures are appropriate to the sensitivity level of the information collected.

Our service providers and agents are bound to maintain the confidentiality of your personal information, and may not use the information for any unauthorized purpose.

Employees are governed by strict standards and policies to ensure that personal information is secure and treated with the utmost care and respect.

Privacy and the Internet

Aon may collect user information from its websites (for example, via cookies which are alphanumeric identifiers transmitted from a website to a visitor's browser and IP address). This information is used solely for enabling us to provide you with a customized online experience and to find ways to improve our site. Although cookies are widely used, it may be possible to disable cookies via your browser settings. However, in so doing, some websites may not function properly or optimally.

Aon websites may contain links to other third party sites that are not governed by this privacy policy. Although we endeavor to link only to sites with high privacy standards, our Privacy Policy will no longer apply once you leave this website. We are not responsible for privacy policies employed by other third parties or any foreign affiliates, since they would be governed by privacy legislation applicable in their country of residence. We suggest, therefore, that you examine the privacy statements of those sites to learn how personal information may be collected, used and/or disclosed.

Contact information

Please contact our Privacy Officer to obtain further information about our policies and procedures or if you have any unresolved inquiries or concerns. We will respond to you promptly and do our utmost to resolve your concerns.

Our Privacy Officer can be contacted as follows:

Mail: Aon
20 Bay Street, Toronto, Ontario M5J 2N9
Attention: Privacy Officer

Email: privacy.officer@aon.ca

Fax: 416.868.5887
Attention: Privacy Officer

*While Aon makes every effort to secure all communications within our control and on our premises, please be advised that **no** method of delivery is absolutely secure and any communication of personal information may be accidentally or deliberately intercepted by third parties.*