

Protecting Your Privacy

Johnson Inc. is a member of the Johnson Group of Companies*. The Johnson Group of Companies (“Johnson”, “we”, “our”, “us”) are committed to protecting your privacy and the confidentiality of your personal information. This Privacy Statement sets out our responsibilities regarding the collection, use and disclosure of your personal information. Personal information is information about you as an identifiable individual and may include such information as your age, contact information, marital status, education, employment history, identification numbers and financial information. Protecting this information is one of our highest priorities and as such we have instituted policies and procedures and use vigorous security safeguards to protect your privacy and the confidentiality of your personal information. The protection of your personal information is an integral part of our service commitment to you. Any reference to the Johnson Privacy Policy is a reference to this Privacy Statement.

Why do we collect, use, and disclose personal information about you?

We collect, use and disclose personal information (including to and from our affiliates and / or subsidiaries, referring organizations and / or third party providers / suppliers) for the following purposes:

- Establish your identity
- Understand and assess your needs and eligibility for products and services
- Analyze, assess, underwrite and reinsure risks on a prudent basis and determine eligibility for discounts
- Facilitate payment of your premiums through credit card or through bank, payroll, or pension deductions
- Investigate and settle claims
- Protect you and us from error, fraud, and illegal activity
- Communicate with you
- Ensure quality assurance
- Establish and maintain responsible commercial relations with you
- Develop, enhance, market, or provide products and services
- Analyze business results and to report to appropriate regulatory or industry entities
- Marketing and promotions, including but not limited to sweepstakes, contests, and online targeted advertising
- Compile statistics, conduct market research in accordance with prudent practices
- Comply with the law or requests of law enforcement officers or regulators
- Provide ongoing service
- Survey your customer and claims experiences and satisfaction; and
- Your personal information may be collected, used or disclosed for other purposes with your consent or as permitted or required by law

What personal information do we collect?

We obtain most of your personal information directly from you. However, we may need to collect information from other sources. We will only collect information pertinent to the appropriate purpose. The personal information we collect includes:

- Name, address, telephone numbers, fax numbers, or e-mail address
- Birth date, gender, marital status
- Driving record, including moving traffic violations and convictions

- Medical and health information
- Details about your automobile, such as make, model, value
- Details about your home and its contents, such as its size and value
- Previous insurance and claims history
- Employment information
- Banking information, credit card information and financial information, such as credit scores, credit history, and/or payment records
- Customer and claims experience and satisfaction; and
- Such other information we may collect with your consent or as permitted or required by law

How do we collect your information?

a. We may collect information from the following sources:

- When you provide the information to us directly, whether through a website, to a sales or customer service representative when you inquire about a quote, on a form or contest entry ballot, or otherwise
- You, or any person authorized by you, on applications for insurance or service products, or other forms filled out in person or through telephone, email, or online
- Government, industry and other entities authorized by law that have information on your claims history or pertinent to an application for insurance
- Consumer reporting agencies
- Your continued interaction with us, such as payment history or claims settlement; or
- Reputable, third party market research agencies who conduct customer and claims satisfaction surveys on our behalf
- We may verify your personal information, or obtain additional personal information about you by checking with government agencies, credit bureaus, motor vehicle agencies, and other authorized fact collecting and verifying entities

b. Automated Information Collection

We collect some information automatically when you visit our websites. This may include information such as the type of Internet browser or computer operating system you are using, your IP address, and the domain name of the website from which you linked to the website. We use this automatically-collected information to improve our website, to enhance user experience, to target the content and advertising we deliver to you, and to improve upon the services we provide.

In addition, when you view the website, we may store some information on your computer in the form of a "cookie" or similar file. Cookies are small pieces of data which are stored on your computer to allow your Internet browser to remember something about a website. We use cookies and IP addresses to obtain information from online visitors to determine how many people visit our website, and to track your online activity as permitted by law. You can set your browser not to accept cookies or have your computer notify you when cookies are being sent by following the instructions for your particular web browser. However, if you refuse cookies, you may not be able to use certain features of our website.

c. Social Media

We may offer you the opportunity to engage with us through third-party social networking websites, plug-ins and applications. Through these platforms, you may allow us to access information associated

with your social media account. We may use this information to confirm your identity and to personalize your experience on our Website.

With whom do we share information about you?

We may share information with the following:

- Any person authorized by you
- Any person required or permitted by law to have access to your personal information
- Any person as is necessary to meet our legal, regulatory, insurance, audit, processing and security requirements or to protect our reasonable business interests
- Intermediaries, such as authorized providers of claims history or motor vehicle abstracts to insurers
- Applicable motor vehicle registries and driver license authorities
- Other insurers, agents or brokers, as necessary
- Professionals, such as lawyers, doctors or adjusters working with or retained by us
- Credit and financial organizations
- Credit card issuers and processors; and
- Industry data collection agencies for the purpose of analyzing business results
- If you are a member of an organization that participates in one of our home and auto insurance sponsorship programs, we may share certain personal information with your sponsor organization to confirm your membership and eligibility and maintain current lists of your sponsor group

When we share personal information with third parties, we provide only that information that is required in the circumstances and we take reasonable contractual or other measures to protect your personal information.

Service Providers: We may transfer personal information to third party agents or service providers (including our affiliates acting in this capacity) that perform services on our behalf, such as administrative and technical services, verification services, claims management services, collection services, marketing and research services, online directed advertising services, data hosting, processing or similar services, or that otherwise collect, use, disclose or store personal information on our behalf for the purposes described in this Privacy Statement. We or service providers acting on our behalf may process and/or store some or all of your personal information in jurisdictions outside of Canada, including the United States. Personal information processed and/or stored outside of Canada will be subject to the laws of the country in which it is stored. We take reasonable contractual or other measures to protect your personal information while processed or handled by our service providers.

Business Transactions: Personal information may be used and disclosed to parties connected with the proposed or actual financing, securitization, insuring, sale, assignment or other disposal of all or part of our business or assets, including for the purposes of: permitting such parties to determine whether to proceed or continue with such transaction, and to fulfil reporting, inspection or audit requirements or obligations to such parties. Assignees or successors of our business or assets may use and disclose your personal information for similar purposes as those described in this Privacy Statement.

Use of Credit Information

Where allowed by law and in accordance with this Privacy Statement, we may periodically access your credit information from TransUnion, a third party credit reporting agency, unless you withdraw your consent for us to do this. This will be a soft inquiry on your credit file and will not affect your credit score.

Where permissible, your credit information may be used to evaluate your policy premium in order to determine the best premium for your insurance policy. Your credit information may also be used to determine payment plan eligibility. Your credit information will not impact your eligibility for insurance coverage or your base premium rate. We will not apply surcharges, increase base premium rates, or refuse to provide coverage because of poor credit information.

You have the ability to check your credit report and history from credit reporting agencies. It is recommended that you request a copy of your credit report at least once per year to verify that your personal information is up to date, that your financial information is correct, and to ensure that you have not been the victim of identity theft. You can request a copy of your credit history from TransUnion at www.transunion.ca, by phone at 1-800-663-9980 (English) or 1-877-713-3393 (French). Other credit reporting agencies can provide a similar credit history report.

If you believe that there is a mistake in your credit information, you should contact TransUnion. If we learn of a correction to your credit file, we will update your insurance file with us and re-evaluate the premium for your next insurance policy renewal.

If you wish to withdraw your consent for us to collect and use your credit information, please call your insurance representative or, for further direction, please contact our Privacy Officer. If you withdraw your consent, we will not deny you insurance coverage, but we may not be able to provide you with the best rate on your insurance policy.

How may you give your consent?

There are many ways you can give consent. Consent can be express, for example, in writing on a form you may sign describing the intended uses and disclosure of personal information, verbally, or through electronic means. Alternatively, where permitted by law, your consent may be implied through an action you've taken or when you continue to use a product or service after we've notified you of a change with respect to your personal information and you have not withdrawn your consent, such as by using an "opt out" option provided, if any. You may indicate your consent by the following.

- Providing your personal information to us for the purposes of acquiring an insurance related product or service, including information previously provided to us
- Your express consent or acknowledgement contained, for example, within a written, verbal, or electronic application process
- Your express consent solicited by us for a specific purpose
- Your receipt of this Privacy Statement until you notify us of a withdrawal of this consent; or
- Your consent given through your authorized representative such as your legal guardian, agent, or holder of power of attorney

Generally, by providing us with personal information, we will assume that you consent to our collection, use and disclosure of such information for the purposes identified or described in this Privacy Statement, if applicable, or otherwise at the time of collection.

By providing personal information about a third party such as a family member you represent that you have obtained their consent to the collection, use, and disclosure of such personal information in accordance with this Privacy Statement.

May you withdraw your consent for us to collect, use and disclose your information?

Subject to certain legal and contractual obligations you may, on reasonable notice, withdraw your consent to the collection, use, or disclosure of your personal information. If you do not wish to consent or if you withdraw your consent we may not be able to provide you with a particular product or service. Where we have provided or are providing services to you, your consent will be valid for so long as necessary to fulfil the purposes described in this Privacy Statement or otherwise at the time of collection, and you may not be permitted to withdraw consent to certain necessary uses and disclosures of the personal information. We will explain the impact of withholding or withdrawing your consent, to help you with your decision.

If you wish to withdraw your consent, you should contact our Privacy Officer at the address or telephone number listed below. Unless we hear otherwise from you, you are giving to us your consent for the collection, use, and disclosure of personal information as provided in this Privacy Statement.

We may contact you on behalf of us or our affiliates to offer other insurance products and services through direct mail, telephone, or other means. If you would rather not receive such information, please use the contact information below to let us know.

How can I change my online communication and advertising preferences?

a. Email

You may request to receive marketing communications from us by email. You may also receive emails from us if you are an existing or former client, or have made a recent inquiry. You may opt out of such communications at any time. Please be aware that, even if you have opted out of receiving marketing communications from us, we may still contact you for transactional purposes such as providing updates to your policy, customer service responses or other policy-related communications. To opt out of marketing communications any time, please contact us or use the “unsubscribe” function found in the footer of all email marketing communications, or contact our Privacy Officer at the address or telephone number listed below.

b. Online Advertising

In order to provide you with information about our offers and services, our third party service providers may use cookies and your personal information track and to tailor the content you see on our website and advertising elsewhere online. We use information to categorize your general interests which helps us to determine what types of advertising may be of interest to you. Our service providers commit to the principles of the Digital Advertising Alliance of Canada, and you may opt out of online interest-based advertising by clicking on the “Ad Choices” logo you see on an ad and following the link to changing your preferences. This will not stop you from receiving any advertising, but the advertising you see will not be based on information about you. We will not share sensitive personal information (medical, financial) with our service providers for this purpose, or use it for targeted online advertising.

How long will we retain your personal information?

We will retain your personal information only as long as necessary to satisfy legal or business obligations, including reasonable business record-keeping obligations. The length of time we keep your information depends on the product or service and the nature of the personal information. We have retention standards that meet customer service, legal, and regulatory needs. When the information is no longer required, we securely destroy it or convert it to an anonymous form.

How do we keep your personal information accurate and secure?

We take reasonable steps to ensure the information in our records is correct and up to date, however we rely on you to tell us when your personal information changes.

As part of our effort to keep your personal information secure, we limit access to your personal information and store it securely using a variety of physical, technological, and organizational safeguards appropriate to the sensitivity of the information. Depending on the nature of the information, it may be stored in the branch you deal with, in various secure computer systems, or in archives in various locations across Canada.

Authorized employees, agents and mandataries who require access to your personal information in order to fulfil their job requirements will have access to your personal information.

Do you have the right to request access to your personal information?

Yes, you have the right to request access or correction of your personal information that we have in our possession or control. To request access or correction of your personal information, please make your request in writing to our Privacy Officer, being as specific as possible as to which personal information you are requesting. We will advise you if for some reason we cannot respond right away. We may charge you a reasonable fee for providing access to your personal information, but only after first advising you of the approximate cost.

What if you have a question or concern about your privacy?

We are responsible for the personal information under our control and have designated a Privacy Officer to be accountable for compliance with this Privacy Statement. If you have any questions or concerns about our privacy practices or compliance with our Privacy Statement or procedure, or if you would like more information about our policies and practices regarding service providers outside Canada, please contact our Privacy Officer at 1-800-507-4115, fax # 1-888-737-4125, or email privacy@johnson.ca, who will respond to your question or investigate your complaint. If you are not satisfied with our response to a privacy related inquiry or complaint, you may contact the Office of the Privacy Commissioner of Canada, or your provincial privacy commissioner, if applicable.

The Privacy Statement may change from time to time. If we intend to use or disclose personal information for purposes materially different than those described in this policy, we will make reasonable efforts to notify affected individuals, if necessary, including by revising this Privacy Statement. If you

are concerned about how your personal information is used, you should contact us as described above or check our website periodically at www.johnson.ca to obtain a current copy of this policy. We urge you to request and review this Privacy Statement frequently to obtain the current version. Your continued provision of personal information or use of our services following any changes to this Privacy Statement constitutes your acceptance of any such changes.

Effective Date: January 2019.

* The Johnson Group of Companies includes Johnson Inc., The Johnson Corporation, Unifund Assurance Company, D.L. Deeks Insurance Services Inc. and any respective subsidiaries. In certain locations Johnson Inc. operates under various trade names and styles that it owns, including, but not limited to, Johnson Insurance, Johnson Assurance, Johnson Insurance Services, Johnson Specialty Insurance Solutions, Morgex Specialty Insurance Solutions, Flewwelling Insurance, Bradley's Insurance - Home and Auto, Morgex Insurance, Haber Blain Insurance, Crain & Schooley Insurance, JB Insurance Services, Pratt, Lambert & Brown Home and Auto, Johnson Specialty Kanata, Broker Title Services and Meyer's Insurance. Under license from the owners of the respective brand names, Johnson also operates under the trade names and styles, "Servus Insurance Services - Home and Auto" and "InsureLine Prime". The Johnson Group of Companies is a part of RSA Canada. RSA Canada also includes: Royal & Sun Alliance Insurance Company of Canada (www.rsagroup.ca), RSA Travel Insurance Inc. (www.rsatravelinsurance.ca) which operates as RSA Travel Insurance Agency in British Columbia, Canadian Northern Shield Insurance Company (www.cns.ca), Western Assurance Company (www.westernassurance.ca), Ascentus Insurance Ltd., and Quebec Assurance Company.