

# Manulife Financial - Canadian Division Statement of Privacy Principles and Practices ("the Policy")

## At Manulife Financial, we respect your privacy

Privacy legislation is relatively recent, but for decades, Manulife Financial has safeguarded the sensitive personal information of our customers. Protecting your personal Information and respecting your privacy is important to us. As a provider of financial products and services, the collection and use of personal information is fundamental to our business. Equally important is your trust in our handling of your personal information.

To earn that trust, we abide by **Ten Privacy Principles**. These Principles are based on the federal government's privacy legislation, the *Personal Information Protection and Electronic Documents Act*.

## Ten Privacy Principles

- 1. Accountability:** We are responsible for personal information under our control. We have designated individuals who are responsible for monitoring our ongoing compliance with the Privacy Principles.
- 2. Identifying purposes:** The purposes, for which personal information is collected, will be identified by us, or through our, or your, authorized representatives.
- 3. Consent:** Your consent is required for the collection, use and disclosure of personal information, subject to certain exceptions. Such exceptions are set out in the law and include where legal, medical or security reasons make it impossible, or impractical, to seek consent. Your consent may be expressed in writing. It may also be given verbally, electronically, or through our, or your, authorized representatives. In certain circumstances, it may also be implied.
- 4. Limiting collection:** The collection of your personal information must be by fair and lawful means, and be limited to that which is necessary for the purposes identified.
- 5. Limiting use, disclosure and retention:** Your personal information may only be used or disclosed for the purposes for which it was collected, other purposes you consent to, or as required or permitted by law. It may only be kept for as long as is necessary to satisfy the purposes for which it was collected, or as required or permitted by law.
- 6. Accuracy:** Any personal information that is collected, used or disclosed should be as accurate, complete and as up-to-date as is necessary for the purpose for which it is to be used.
- 7. Safeguards:** Personal information shall be protected by security safeguards that are appropriate to the sensitivity of the information, in order to protect your personal information from unwarranted intrusion, release or misuse.
- 8. Openness:** Information about our privacy policies and practices for managing your personal information shall be made available to you.
- 9. Individual access:** Upon written request, you will be informed of the existence, use and disclosure of your personal information and you will be given access to it, subject to certain exceptions, as permitted by law. You may also verify the accuracy and completeness of your information, and request that it be amended, if appropriate.
- 10. Inquiries and concerns:** You may contact us if you have any inquiries or concerns about our privacy policies and practices.

## What our customers should know about Manulife's privacy practices

### The information we collect

Personal information is information that refers to you, specifically.

For any Manulife Financial product or service you obtain, we will tell you the purposes for which we need the personal information we collect.

We will use fair and lawful means to collect your personal information. We will only collect information that is pertinent and consistent with the purposes of the collection. Whenever practical, we will collect the required information directly from you, or from your authorized representative(s), in completed applications and forms, through other means of correspondence, such as the telephone, mail or the Internet, and through your business dealings with us.

In some cases, and with your consent, we may need to ask an independent source to verify or provide supplemental information. These sources could include service providers we retain, other insurance companies or financial institutions, your employer or credit reporting agencies. In the case of your medical or health-related information, additional sources could include your doctor(s), other healthcare providers or facilities.

If your information is being collected by telephone, the call may be recorded or monitored for the following reasons:

- to establish a record of the information you provide,
- to take or verify instructions from you,
- to maintain quality service levels,
- to assist in staff training

If you are not comfortable with having your telephone calls recorded, you have the option of communicating

with us in writing instead. Where you have chosen to only communicate with us in writing, your written communications should request that any response to you be in writing, as well.

### What we need to know and why

We collect information from you and about you, only with your consent, or as required or permitted by law. In general, we will collect personal information such as your name, address, telephone number(s) or other identifying information, such as your Social Insurance Number (SIN) or date of birth.

The type of additional information we gather will depend on the type of product or service involved. For example, it would depend on whether the product or service is banking, insurance or investment related. The information gathered may be financial, which would include such information as place of employment, annual income, assets and liabilities. It may be investment or advice related, requiring information on such things as your financial goals and retirement plans. If you are applying for insurance or group insurance benefits, it may also include health information or lifestyle related information, such as your occupation, travel history and plans, driving record or criminal record.

Generally, we collect, use and disclose your personal information to:

- Confirm your identity, and to protect both you and us against errors, fraud or other misrepresentations,
- Evaluate your financial needs and determine the suitability of our products and services for you,
- Determine your eligibility for products and services,
- Properly administer the products and services we provide, including the assessment of claims,

- Comply with a variety of legal requirements, including any tax reporting obligations under the federal Income Tax Act, or the Quebec Act respecting the Ministère du Revenu
- Assist us to understand the current and future needs of our customers, for example, to conduct customer surveys and other forms of market research and analysis

We will only keep your personal information in our records for as long as it is needed to fulfill the identified purposes, or as required or permitted by law.

Personal information that is no longer required will be destroyed, erased or made anonymous.

When we destroy personal information, we will use safeguards to prevent unauthorized access to the information during the destruction process.

## Your Social Insurance Number

There are a number of reasons why we may ask for your Social Insurance Number (SIN).

Where there may be interest income or other income to be reported, your SIN is required by law in order to meet tax reporting requirements under the federal Income Tax Act, or the Quebec Act respecting the Ministère du Revenu.

With your consent, we may also use your SIN as a unique identifier, to keep your personal information separate from that of other customers, or individuals with similar names, and to help maintain the integrity and accuracy of your personal information. For example, where it is appropriate to verify your credit history, we may use your SIN to ensure that the credit information we are asking for — and receiving — is about you, rather than someone else with the same or similar name.

You may elect not to have your SIN used for purposes other than as required by law, however, as explained earlier, this may affect our ability to fully ensure the accuracy and integrity of your personal information.

## Your consent

We collect, use and share your personal information only for disclosed purposes related to the products and services we offer, and only with your consent, or as permitted or required by law. Your consent may be expressed in writing, or it may be given verbally, electronically, or through our, or your, authorized representative(s), such as your financial services advisor.

Your consent may also be implied or inferred from certain actions. For example, if you present your benefit identification card to your healthcare provider, instead of paying for the prescription or procedure directly, it is understood that you are giving your consent for the healthcare provider to provide your personal information to us, in order for us to process the claim payment.

You may withhold or withdraw your consent for us to collect, use and share your personal information, as long as there are no legal or contractual reasons preventing you from doing so. Depending on the circumstances, however, withdrawal of your consent may impact our ability to continue to provide you with the products and services you have requested, or, in the case of insurance and group insurance benefits, it may prevent us from keeping your coverage in force, or properly evaluating and processing any claims.

Generally, the disclosure of your personal information will be restricted to those who have a need for, and the right to, the information.

Your personal information will only be provided to, or be accessible by:

- Our employees, agents and representatives, who need the information in the performance of their duties for us,
- Our affiliates, to:
  - resolve your concerns about any related products and services with us
  - assist in other required investigations

- Service providers, who need the information in the performance of their duties for us, and to satisfy their obligations to us,
- Any person or organization to whom you gave consent, and,
- Anyone who is otherwise authorized by law

In some cases, your personal information may be provided to these people, organizations and service providers in other provinces or jurisdictions outside Canada, and would therefore be subject to the laws of those provinces or jurisdictions.

### Service providers

We may use service providers to provide us with various services such as, printing, mail distribution, information technology, data storage, administration, marketing, (which would include market research and promotional services), paramedical, claims adjudication, investigation and reinsurance. Where personal information is provided to our service providers, we will require them to protect the information in a manner that is consistent with our privacy policies and practices.

### Accessing and amending your information

We will make all reasonable efforts to ensure that any personal information we collect and keep is as accurate, complete and as up-to-date as required for the identified purposes. To do so, we will rely to a large extent on you to provide us with accurate information and to inform us of changes, such as changes in your contact information. You have the right to access and verify your personal information maintained in our files, and to request that any factually inaccurate personal information be corrected, if appropriate. Depending on the circumstances, we may not always be able to give you access to all information, or there may be a charge for personal information that you request. Should this happen, we will let you know.

### We are committed to protecting your information

We are committed to protecting your personal information from unauthorized access or use, by ensuring that the necessary physical, organizational and technological safeguards are in place, that are appropriate to the sensitivity of the information. Essentially, this means that personal information is protected:

- Physically, by building security measures and physical barriers,
- Organizationally, by our policies, procedures and access levels, and,
- Technologically by, for example, where appropriate, the use of passwords, encryption, firewalls, anti-virus and anonymizing software

All of our employees, representatives, agents and service providers who act on our behalf, are required to abide by our privacy policies and practices.

If we receive a request to release your personal information, we will only do so upon satisfactory identification and proof of entitlement of the requestor, or as required or permitted by law.

### Special offers and marketing promotions ... it's your choice

Some of our business areas may, from time to time, offer or promote other financial products and services, or those of our affiliates and select third parties, that they believe may be of interest to you.

We will share personal information with our affiliates for these purposes, only if the law permits it.

Please note that we do NOT give your personal information, without your consent, to any organization outside of our member companies, for the purpose of that organization marketing their own products or services directly to you.

## CUSTOMER PRIVACY POLICY

If you do not wish to receive our marketing offers or special promotions, you may choose to "opt out", by simply contacting us, and we will remove your name from our mailing lists. This means you will not be eligible to receive addressed, direct mail offerings. This opt-out will not extend to:

- Information included in, or with, periodic statements which relates to any Manulife Financial product or service that you currently have with, or receive from, us, or
- General product and service information and updates included in, or with, client statements

To remove your name from any special mailing list that we maintain, please contact us by telephone or mail.

**Please note:** When you contact us to remove your name and address from our marketing mailing lists, we will use all reasonable efforts to do so in a timely fashion. If you are applying for a new product or service, we will process your request immediately. Otherwise, if you have an existing product or service with us, we will generally require a reasonable period of time, which may vary, depending upon the product or service, to process your request.

### Who we are

In this Statement of Privacy Principles and Practices, *we*, *us* and *our* mean The Manufacturers Life Insurance Company ("Manulife Financial") — Canadian Division operations, Manulife Canada Ltd., Manulife Securities Incorporated, Elliott & Page Limited, First North American Insurance Company and Manulife Bank of Canada. *You* and *your* mean individuals whose personal information we are collecting, using and disclosing.

Manulife and the block design are registered service marks and trademarks of The Manufacturers Life Insurance Company and are used by it and its affiliates including Manulife Financial Corporation.

08/2010

## Contact us

If you have any questions or concerns about our privacy policies and practices, or you want to know more about the process for accessing and/or correcting your personal information, or opting out of marketing offers, please contact us:

**Mail** Chief Privacy Office  
Manulife Financial  
P.O. Box 1602  
Del Stn 500-4-A  
Waterloo, Ontario N2J 4C6

<b>Telephone</b>	Affinity Markets	1-800-668-0195
	Group Benefits	1-800-268-6195
	Group Savings	1-888-245-5558
	Individual Insurance	1-888-626-8543 (in Quebec 1-888-626-8843)
	Manulife Securities	1-800-991-2121
	Manulife Investments	1-888-790-4387 (in Quebec 1-800-355-6776)
	Manulife Mutual Funds	1-888-588-7999 (in Quebec 1-877-426-9991)
	Manulife Bank of Canada	1-877-765-2265