

CORPORATE PRIVACY POLICY

At Sibley & Associates Inc., the privacy and protection of personal information is important to us. As a provider of disability management services, the collection and use of personal information is fundamental to our day to day business operations. Sibley & Associates Inc. also protects the personal information of its employees and consultants (for more information on this, see our Privacy Policy and Procedures Manual).

We have established this Privacy Promise to govern the actions of all Sibley & Associates employees and consultants as they relate to the collection, use, retention and disclosure of personal information. Each Sibley & Associates' employee and consultant must abide by our commitment to privacy in the handling of personal information.

We are committed to providing quality disability management services in a manner which fosters trust and confidence among our customers, clients, employees and consultants. We adhere to the 10 principles of the *Personal Information Protection and Electronic Documents Act (PIPEDA)* when handling personal information.

What is personal information?

Personal information means any information about an identifiable individual that is recorded in any form, but does not include customer related business information.

How do we obtain personal information?

Personal information is provided to Sibley & Associates directly from our customers (with client consent), and additional personal information will be obtained/generated (again with client consent) while providing our services.

What personal information do we collect?



If you are a client of Sibley & Associates we will collect your name, address, telephone number, gender, medical information, date of birth, your employer's name, address and phone number, your claim/file number, your legal counsel information, any interpreter requirements and your family information.

How do we use personal information?

We may use personal information for the following purposes:

- identifying the individual
- establishing and maintaining file information
- ensuring the information in our records is accurate
- verifying previously given information when necessary
- producing reports and/or generating file information
- meeting legal and regulatory requirements

When is information disclosed to third parties?

We disclose personal information to other organizations only for the purposes set out in this Privacy Promise and for no other purpose. Third parties who may be provided with your personal information include:

- Consultants
- Medical practitioners and other health care providers
- Other Sibley & Associates affiliates
- Government agencies and regulators
- Third parties who perform services for us, such as mailing, courier deliveries, imaging and document storage
- Entities to whom we are legally obliged to provide information

How do we obtain consent?

Knowledge and consent is required before we collect, use or disclose personal information, except where required by law. When the personal information to be obtained/generated is sensitive, such as



medical information, we will obtain additional written client consent before collecting, using or disclosing that information.

How can the client withdraw consent?

The client may withdraw their consent to the use of their personal information at any time by contacting the Director of Corporate Services at sibley@sibley.ca or by calling 1-800-363-8900. If consent is withdrawn, this may limit the services or products we are able to provide. In some circumstances, legal requirements may prevent the client from withdrawing consent.

How can personal information be accessed and updated?

We will provide access to personal information upon written request from authorized individuals. Our verification practices help to minimize risk that such information is released to anyone not authorized to receive it. We will provide the requested information within 30 days of receipt of written request, unless prohibited by law. Except under limited circumstances, amendments or updates to personal information can be made at any time. We reserve the right to charge for our costs incurred in providing the information requested. If we are unable to provide access to personal information, we will provide an explanation.

We may not be able to provide you with full access to your information if:

- It contains references to other individuals
- We would have to disclose proprietary information regarding Sibley & Associates or its affiliates
- It has been destroyed
- It is too costly to retrieve
- It cannot be disclosed for legal or regulatory reasons

How is your information protected?

Sibley & Associates is as concerned with protecting personal and confidential information as you are. We have taken all appropriate measures and put in place controls aimed at safeguarding personal



information. These measures include restricting physical access to our offices and records, passwords and file encryption for on-line activities. Our employees and service providers have access to personal information only for the purposes set out in this policy to enable them to provide our services.

How long do we keep personal information?

We only keep personal information for as long as it is required (whether to provide our services or as required by law or regulations). Once it is no longer needed, it is destroyed in accordance with our records management and destruction practices. How long we keep personal information depends on the reasons for which it was collected. The type of service and the kind of information also affects the length of time we retain it. Personal information may be kept, so long as it is legally necessary for us to have sufficient information to respond to any issues that may arise at a later date.

Will we change this Privacy Promise?

If we find it necessary or desirable to change our Privacy Promise in the future, we will post changes on our website as soon as they go into effect. You have a right to know at all times what information we collect, how it is used, and under what circumstances we can disclose it. Any change to this Privacy Promise will become effective on the date the change is posted on our website.

How to contact us:

Issues or concerns may be resolved by contacting Gail Burnett, Director of Executive Services, at:
Telephone: 1-800-363-8900
E-mail: sibley@sibley.ca

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