

## Johnston Group Inc. has always been, and will continue to be, committed to protecting your privacy and ensuring your personal information remains confidential.

Our privacy practices are an extension of the respect we hold for plan participants, plan sponsors, our sales organization and our own employees. As a long-standing member of the financial services industry, we are committed to best business practices to prevent any breach of confidentiality and to maintaining the highest standards of conduct.

When you, as a company or an individual, apply for coverage under a group benefits plan, you share personal information about the company, yourself, and/or family members. Johnston Group will only use, retain and disclose such information to administer the terms of your group policies and plans, including:

- confirming your eligibility for insurance coverage;
- adjudication and processing the claims you send us;
- advising you of important information related to your plan;
- offering you complementary products and services; or
- meeting regulatory requirements.

We will contact you and obtain your consent if it ever becomes necessary to use your information for any other purpose.

### WHY WE COLLECT, USE AND DISCLOSE YOUR PERSONAL INFORMATION

The collection, use and disclosure of your personal information helps Johnston Group provide you with our best service. It enables us to communicate effectively with our partners and you for the purpose of administering and developing your plan, to conduct business you have consented to, or as required by law.

More specifically, we collect, use and disclose your personal information for the following reasons:

- verification of identity
- insurance claim adjustment, settlement, and audit
- to analyze, properly subsidize and underwrite insurance risks
- to determine appropriate premiums and costs
- to advertise or market services and products offered by us, our subsidiaries and our partners, unless you otherwise unsubscribe
- for market research
- to process payments, personal information and data through third party service providers such as payment processors, data processors, etc.
- to meet our insurance industry obligations and legal mandates for reporting, conduct, tax requirements, and other regulatory necessities
- to identify and prevent fraudulent, unauthorized or criminal conduct
- to work with medical professionals, medical service providers, government bodies, or licensing bodies
- to work with other parties for which you have provided consent

We use enrolment and claim information only to administer your group benefits plan and to ensure you receive all the benefits you are entitled to receive. As a result, we may disclose your personal information to:

- insurance companies and service providers providing benefits under your group contract;
- physicians or other healthcare institutions for the purpose of determining coverage eligibility, and processing and adjudicating your claims;

- your authorized representatives; and/or
- government and regulatory bodies where legally necessary or to process and adjudicate your claims.

When we disclose your personal information to third parties, we mandate those parties to protect and handle your personal information consistently with our own privacy practices and all applicable laws.

These third parties may, at times, process and store your information in the United States. Therein, these cases will be subject to USA and state laws.

### COLLECTING YOUR PERSONAL INFORMATION

In most cases, when you sign up for your benefits program we obtain all the information we need directly from your employer's application forms or from your enrolment form. This may include your name, address, phone number, age, occupation, salary, family status and answers to basic health questions.

In some cases, we may ask for additional information from the insurance industry's MIB Group, Inc. (Medical Information Bureau), health insurance companies, licensed physicians and healthcare professionals or related institutions in order to determine your eligibility for coverage.

When you make a claim for benefits, we may also collect information to determine the eligibility for the claim, and the nature of the expense. We may contact you, your healthcare professionals or other benefit providers.

During communication with Johnston Group agents and employees - such as on calls, during online chats, or by using our contact us email - Johnston Group may record these communications to not only ensure quality customer service, but to confirm your instructions; to register our discussions with you; or to resolve complaints.

All of this information will be collected with your knowledge and consent unless otherwise indicated or allowed by law. We will make every reasonable attempt to keep this information accurate and current, and we ask that you advise us of changes in order to keep our records up-to-date. This will allow us to provide you with the best service possible.

### COLLECTING WEBSITE DATA

We collect information from our website visitors to improve the navigation and overall user experience on our website, for marketing purposes, and to evaluate the operation and use of our website.

Location information may be collected when you visit our website through a mobile device. If you would prefer not to provide us with this data, your location settings can be changed on your mobile device.

Any location data that is passively collected is not personally identifiable and will only be used to determine which geographic markets are inquiring about our services in order to serve them better.

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## COLLECTING WEBSITE DATA (CONTINUED)

Information may be collected passively as you use the site. Cookies, pixels, and Google Analytics may assist us in determining browsing habits within this website and highlight which elements and pages are most valuable to users like you. This information will not contain any personally identifiable data unless you provide express permission for its collection.

To learn how you can opt out of Google Analytics, please visit <https://tools.google.com/dlpage/gaoptout/>.

This website contains links to third-party websites outside of Johnston Group's management. Unless expressly stated, Johnston Group does not share your personal information with those websites. This Privacy Policy does not apply to those websites, and Johnston Group is not responsible for the information practices or content of those websites.

## PROTECTING YOUR PERSONAL INFORMATION

Johnston Group has developed and implemented privacy-specific policies that are updated periodically. We employ best practices to protect collected information from loss and unauthorized access.

Our systems are designed to prevent unauthorized access and, within our organization, we limit access to your personal information to only those individuals who administer your group plan and benefits. Each employee in our organization has signed a confidentiality agreement further protecting your personal information.

Your personal information is kept only as long as we need it to administer your group plan and to fulfill regulatory obligations. Our organization has policies and procedures in place to securely delete or physically destroy all personal information when it is no longer needed.

When we deal with other persons or organizations (such as other benefit providers when settling claim payments or when using cloud-based services), we protect the confidentiality of your personal information and ensure it is not used for any unauthorized purpose.

## ACCESSING YOUR PERSONAL INFORMATION

You may, at any time, ask us what information we have collected about you and why we have it. We will respond to your request and provide you with access to the information we have on file.

Your request should be submitted to us in writing and you will be required to provide proof of your identity.

It is your right to choose not to provide us with some or all of your personal information, to have us rectify any of the personal information you have shared with us, or to deny us the use or disclosure of your information for certain purposes. If you exercise this right, please be aware that we may be limited in our ability or not be able to provide you with coverage under a group benefit program. It may also limit our ability to administer your group benefits, including adjudicating and processing your claims, or provide an optimal service experience.

We will retain personal information as long as is necessary to meet the purposes for which it was collected unless asked by you to delete it or authorized/obligated by relevant laws to keep it for a longer period of time.

## FROM US TO YOU

Please contact our Privacy Officer at the address below if you want to:

- better understand the kinds of information we collect,
- express any concern about our privacy policies or how we've handled information about you, or
- ask questions about our privacy policies.

Please include your name, the best time of day for us to reach you, your preferred email address/phone number, and the reason you are contacting our Privacy Compliance Officer.

**Privacy Compliance Officer**  
**Johnston Group Inc.**  
**1051 King Edward Street,**  
**Winnipeg, MB R3H 0R4**  
**[privacyofficer@johnstongroup.ca](mailto:privacyofficer@johnstongroup.ca)**