

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

Our privacy practices are part of a larger corporate commitment to respect individuals, from plan sponsors and participants, to our sales organization and our own employees. As a long-standing member of the financial services industry, we have always worked to ensure that our business practices prevent any breach of confidentiality and we work to maintain 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;
- 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.

COLLECTING YOUR PERSONAL INFORMATION

In most cases, when you sign up for your benefit program we obtain all the information we need directly from your employer or from you (from the employer's application forms, or from your enrolment form). This may include 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 of the claim, and the nature of the expense. We may contact you, your healthcare professionals or other benefit providers.

All this information will be collected with the individual's knowledge and consent. 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.

PROTECTING YOUR PERSONAL INFORMATION

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 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.

DISCLOSING YOUR PERSONAL INFORMATION

We use enrolment and claim information only to administer your group benefit plan and to ensure you receive all the benefits you're 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, such as individuals with Power of Attorney or your insurance advisor; or
- government and regulatory bodies where required by law or for the purpose of processing and adjudicating your claims.

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 within 30 days 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.

This Privacy Policy has described the collection, protection and disclosure of the personal information we need to administer your group benefit program. It is your right to choose not to provide us with some or all of your personal information, 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.

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.

Privacy Compliance Officer
Johnston Group Inc.
1051 King Edward Street, Winnipeg, MB R3H 0R4
privacyofficer@johnstongroup.ca