

# Service Line Warranties of Canada

## CUSTOMER DATA PRIVACY POLICY

Effective Date: August 2018

### Scope

Service Line Warranties of Canada, Inc. and its parent, affiliate, and subsidiary entities (“**SLWC**” or “**We**” or “**Us**” or “**Our**”) are serious about the private nature of your Personal Information (as defined below), such as the name, address, telephone number, email address, and other information obtained from, or provided by, you (“**You**” or “**Your**”) to Us, regardless of the manner in which it is provided, including, but not limited to, information provided by mail, e-mail, telephone, mobile phone (including applications or text message), surveys, sweepstakes, contests, or on Our website (“**Website**”).

By enrolling in a plan/policy or other product or service offered by Us or by Our selected partners (“**Partners**”), by visiting and/or registering as a user on Our Website, or by providing Us with Your information during enrollment, submitting a claim, or for any other reason, regardless of the forum or media in which it is provided, You accept and agree to the terms set forth in this Privacy Policy (“**Policy**”). If You do not agree to the conditions set forth below, please notify SLWC that You do not want Your Personal Information used in accordance with this Policy, do not provide Us with Personal Information, and do not visit Our Website.

This Policy applies to all Personal Information accessed, collected, used, transmitted, disclosed, stored or maintained by Us, including both electronic data and paper records. All of Our employees, whether permanent or temporary, independent contractors, Partners, affiliates, contractors or third parties working on Our behalf, will adhere to this Policy.

Please read this Policy carefully to fully understand how We collect, share, and protect Personal Information about You. This Policy is incorporated into and is part of the Terms of Use of the Website. To access the Terms of Use [click here](#).

### Accountability

In the course of Our business or operating Our Website, it is necessary for Us to access, collect, use, transmit, disclose, store, maintain and otherwise handle Personal Information about You. This Policy provides the basis for protecting such Personal Information while ensuring Our compliance with all applicable laws and industry requirements.

We are committed to ensuring that the Information (as defined below) You share with Us is secure. All employees, Partners, or third parties who are provided access to Your Information may only use such data for the purposes set forth in this Policy, and if they take steps to provide reasonable safeguards to protect Your Information at all times.

Transmission of information on the internet is not completely secure and therefore We cannot guarantee the security of Your Information sent to Us electronically on Our Website or otherwise; transmission of such Information is therefore entirely at Your own risk.

### Information We Collect

In order to deliver personalized and relevant information to You by mail, telephone, e-mail, or on Our Website, We collect various types of information from You as set forth more fully below (collectively, “**Information**”). Please do not provide Us with sensitive information or health information.

In the course of Our business or operating Our Website, or delivering Our products and services through technology-enabled solutions, We may collect and process the following Information about You:

- **Technical Information.** We may collect details about You, when You contact Us or visit Our Website (“**Technical Information**”) including, but not limited to:
  - Product and service enrollment(s),
  - Utility provider,
  - Location data,
  - Your IP address,
  - Traffic data,
  - Weblogs,
  - The date and time You accessed or left the Website,
  - The pages You viewed on the Website, and
  - Other communication data.

Some parts of Our Website use cookies and other technologies to collect this Technical Information. See the section titled “Cookies, Web Beacons, and Other De-Identified Data Collection” below to learn more.

We may also collect technical, aggregated information about Your use of Our Website.

If You access Our Website from a mobile device, We may also collect the unique device ID, device make and model, device IP address, web browser type and version, and mobile carrier.

- **Personal Information.** “**Personal Information**” relates to any information that can be used to identify an individual, such as name, address, residential telephone number or mobile telephone number, e-mail address, utility account number, and other biographic information. If You contact Us, or choose to enroll in products or services offered by Us or Our Partners, or link to or register on Our Website, We will ask You to provide certain Personal Information to Us. If You access Our Website via a third-party social media service, We may also access or collect additional information unique to You from that third-party social media service (in accordance with authorization procedures determined by the social media service), including, but not limited to: third-party social media handle, profile or account information, website URL, and photographs or other graphics.
- **Financial Account Information and/or Credit or Debit Card Information.** If You purchase products or services offered by Us or Our Partners, We will collect certain financial and/or utility account information from You, such as a financial or utility account number, credit or debit card number, or chequing account number (“**Financial Information**”). We will only collect and store such Financial Information for payment purposes, as more fully set forth below, to the extent necessary to provide You with Our products and services. We will not use it for any other purpose, and will take adequate security measures to protect the Financial Information You provide Us.
- **Contact Us.** If You should email Us through the “Contact Us” link on Our Website, We request Your contact information such as name, address, telephone number, and e-mail address.
- **Product Reviews.** If You choose to provide feedback or review one of Our products or services We will collect any information You provide to Us or a third-party as part of Your review, regardless of the forum or media in which it is provided, including, but not limited to:
  - Name,
  - Address,
  - Residential and mobile telephone number,
  - E-mail address,
  - Your geographic location,
  - Type of service,

- Your review, comments, feedback, etc.
- **Surveys, Sweepstakes, and Contests.** If You choose to participate in one of Our surveys, sweepstakes or contests, We may collect Your contact information, such as: name, address, telephone number, mobile telephone number, and e-mail address.
- **Community Functions.** We may make available to You community functions including, but not necessarily limited to, chat rooms, forums, messages boards, and blogs. Any information You disclose in these areas becomes public information. You should exercise caution when deciding to disclose Your information and should use such community functions at your own risk.

In addition to the above, and where permitted to do so, We may also collect Information about You from third parties or sources that are available to the public.

You may choose not to provide Us with certain Information in some situations, but if You make this choice, We may not be able to provide You with the product, service, or information You request.

### **Cookies, Web Beacons, and Other De-Identified Data Collection**

Like most websites, We make use of browser “cookies”. A cookie is a very small text document, which often includes an anonymous unique identifier. When You visit a website, that site’s computer asks Your computer for permission to store this file in a part of Your hard drive specifically designated for cookies. Each website can send its own cookie to Your browser if Your browser’s preferences allow it, but (to protect Your privacy) Your browser only permits a website to access the cookies it has already sent to You, not the cookies sent to You by other sites. You can manage or disable Your cookies by using tools of Your browser. If You choose to disable cookies, We will not store certain Information You provide to Us. However, if You do choose to remove cookies or reject cookies it may affect certain features or services of Our Website. For more information regarding the protocol We use when You disable Your browser’s cookies, [click here](#).

As You browse Our Website, the Website uses its cookies to differentiate You from other users in order to prevent You from seeing offers inapplicable to You or requiring You to log in more than is necessary for security. Cookies, in conjunction with Our web server’s log files, allow Us to calculate the aggregate number of people visiting Our Website and determine which parts of the Website are most popular. This helps Us gather feedback in order to constantly improve Our Website and better serve Our customers. Generally, the cookies used on Our Website do not allow Us to gather any Personal Information about You. However, should You make a purchase through Our web order process, We require You to submit certain Personal Information (e.g. name, address, e-mail address, and telephone number) and Financial Information in order to checkout. If You set up an account with Us through Our web order process, We store Your username and password and maintain a record of Your contact information associated with the purchase. We do not store Financial Information through Our cookies. We will never use cookies to retrieve Information from a computer that is unrelated to Our Website or services.

We may collect Information using web beacons. Web beacons are electronic images that may be used in Our services or in Our e-mails. We use web beacons to deliver cookies, count visits, understand usage and campaign effectiveness and tell if an e-mail has been opened and acted upon.

SLWC may share some Information with others, in aggregate, anonymous form, which means that the Information will not contain any personally identifiable information about You or any other person. As such, third party cookies do not track Your Personal Information from Our Website over time or across different websites. However, SLWC is not responsible for third party cookies when You leave Our Website and enter a third party website. Please see the “Third Party Websites and Interaction” section below for more information.

### **Third Party Websites and Interaction**

We may create links allowing You access to third-party websites, or there may be instances when You access Our Website via a link on a third-party website. We are not responsible for the internet collection practices or the content that appears on those websites and We do not endorse those websites. By accessing other third party websites through Our Website, or *vice-versa*, You are consenting to the terms and privacy policies of those websites. We do not accept responsibility or liability for their policies whatsoever as We have no control over them. Please consult those websites' individual privacy policies in order to determine how they treat user information.

### **Identifying Purpose & Use**

We collect Your Information to provide You with information relating to Our products and services, and to operate and improve Our services to You. We use Your Information to establish and manage Our customer relations and customer service with You, and to perform related functions and send You related information, including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages. We also use this Information to provide and deliver news, promotions, special offers, information, or to offer You other products and services that may be of interest to You in accordance with applicable, or communicate with You about contests, or to process and deliver contest entries, correspondence, and prizes. We may also use Your name, city/province of residence, and the comments that You may provide in response to questionnaires or surveys for Our media advertising and promotional purposes in any media now known or hereafter developed.

The Technical Information We collect on the Website will be used to find out how users use Our service and Website, other internal purposes and to help Us interact with Website users. For example, this information will tell Us how much time users spend on the Website, what websites Our users are coming from, and to what websites Our users are going. The collection of this Technical Information allows Us to, among other things, prepare for traffic load demands and to efficiently deliver Our products and services.

As already stated, We will only collect and store Your Financial Information for payment purposes; We will not use such information for any other purpose, and will take adequate security measures to protect the Financial information You submit.

If a new purpose for using Your Information develops, We will identify that purpose in a stated revision to this Policy. You will be notified of any such changes in a manner consistent with the "Openness" section below.

### **Consent and Choice**

When You interact with Us, We obtain Your consent to collect, use or disclose Your Information for the purposes set forth in this Policy.

If You prefer not to receive communications from Us and/or not to have Your Personal Information shared among Our group of companies or with Our Partners for the purposes of marketing, You can have Your name added to Our Do Not Mail, Do Not Call, Do Not E-Mail, or Do Not Share lists (collectively "**Do Not Contact Lists**").

If You do not want to receive marketing information from Us You may withdraw Your consent by writing, emailing, utilizing the "unsubscribe" feature in Our emails, or calling Us using the contact information listed in the "Contact Us" section below. If You opt out, You may still receive information from Us but only if it is necessary to provide You with Our products and services.

### **Disclosure**

We will only use or disclose Your Information for the purpose(s) it was collected and as otherwise identified in this Policy. Your Information may be transferred, processed and stored outside of the province in which You reside and/or outside of Canada. Under the laws of these other jurisdictions, in certain circumstances

foreign courts, law enforcement agencies or regulatory agencies may be entitled to access Your Information without notice to You. By submitting Your Information, You agree to this transfer, storing or processing.

We may disclose Your Information to others including any company in Our group of companies, Partners, or third parties to carry out Our services and deliver Our products to You, send You related information, including but not limited to, confirmations, invoices, surveys, technical notices, updates, security alerts, and support and administrative messages, and provide and deliver information and offers on other products and services offered by Us, Our Partners, or third parties that may be of interest to You, in accordance with applicable law. We may also share Your Information with Our group of companies or vendors to provide You with products and services or for the purpose set forth in this Policy, in accordance with applicable law.

We may use third party service providers to help Us operate Our business, such as authorization of payment transactions, marketing, mailing and fulfillment vendors, home repair technicians, service-related technology providers, and may share Your Information with these service providers for those limited purposes.

We may also provide third parties with statistical, aggregated information about Your use of Our Website and to monitor and conduct an analysis of Our Website traffic and usage patterns, and analyze trends.

If SLWC, or a portion of SLWC, is sold to, or merges with, another company, or declares bankruptcy, some or all of the Information collected from You may be transferred to a third party as a result of the transfer of assets. We may disclose Your Information when We determine it is necessary to comply with applicable laws or protect the interests or safety of SLWC or any other person. We may also transfer Your Information as part of a corporate reorganization or other changes in corporate control.

Over time, We may buy new businesses. Information associated with any accounts, products, or services of the business being purchased or sold will be transferred as a business asset to Us.

### **Accuracy & Individual Access**

We are committed to maintaining the accuracy of Your Information. At Your request, We will confirm, and/or update the Information We hold about You. We may have You verify Your identity first. Where appropriate, We will advise others of any material amendments to Your Information that We may have released to them.

Requests to review or verify Your Personal Information, or to find out to whom We have disclosed it, must be made in accordance with the *Personal Information Protection and Electronic Documents Act*, or other applicable law. You must submit Your request in writing and provide specific information about You to enable Us to search for, and provide You, with the Personal Information We hold about You. If We are unable to provide You some of the Personal Information We hold about You, We will tell You why. To request, review or verify Your Personal Information, please contact Us using the information provided in the "Contact Us" section below.

### **Safeguards**

In order to prevent unauthorized access, use or disclosure of Your information, We have put in place commercially suitable physical, administrative and technical safeguards to secure Your Information in both electronic and paper form. These physical, administrative, and technical safeguards are established to ensure: (1) the safeguarding of Your Information, (2) Information is used in accordance with this Policy, and (3) that precautions preventing misuse are both effective and appropriate. We adhere to the following practices:

- Information You provide will not be accessed or used in a way that is incompatible with this Policy.
- We appropriately protect against unauthorized, inadvertent access, use and/or disclosure through administrative, technical and physical safeguards, including:
  - a. We control access to Our computer information systems containing Your Information by user ID and password;

- b. We control access to Our paper records containing Information by keeping such information in secure areas with restricted access;
  - c. We use up-to-date versions of security software, including malware, patches and antivirus software, firewalls, and encryption methods.
  - d. We train Our employees with regard to safeguarding Your Information.
- We strive to prevent breaches of Your Personal Information with security measures and will notify You of a breach of Your Personal Information if required by applicable law.

### **Openness**

We will update this Policy from time to time, so please review the Policy regularly. If We materially alter this Policy, We will notify You of such changes by either contacting You through electronic or postal mail or by posting a notice on Our Website. Your continued use of plans, policies, products, services, or Our Website will be deemed Your Agreement that Your information may be used in accordance with the new Policy.

### **Contact Us**

Our Privacy Officer oversees privacy governance including this Policy, dispute resolution, education, and communication activities. If You have any questions, comments or complaints about this Policy, or to opt-out of marketing, please contact Us at:

**Service Line Warranties of Canada**

**ATTN: Privacy Officer**

**P.O Box 30**

**Niagara Falls, ON L2E6S8**

**1-866-922-9004**

**[privacy@SLWofC.ca](mailto:privacy@SLWofC.ca)**