



## **WESTERN SURETY COMPANY PRIVACY STATEMENT**

It is the policy of Western Surety Company (“WSC”) to protect and respect the privacy of personal information in accordance with applicable laws. This Privacy Policy explains WSC’s privacy and security practices with respect to all personal information in its possession and control, and may be supplemented by specific policies, procedures, and practices.

### **Why does WSC collect personal information?**

WSC primarily collects personal information in connection with the application for, and administration of, its products and services.

WSC uses this personal information, as necessary, for the following purposes:

- Processing an application for WSC products or services
- Assessing the risk associated with an application for WSC goods or services or with respect to any WSC customer generally
- Providing and administering WSC products or services and administering the customer relationship generally
- Investigating claims
- Processing claims
- Understanding how WSC may improve its services, developing and conducting its business, and providing individuals with information about current and future services and developments in accordance with applicable laws

WSC may also use personal information for other purposes to the extent authorized or required by law.

WSC does not use personal information for any other purposes, unless it has the consent of the individual to whom the personal information relates.

## **How does WSC collect personal information?**

The type of information that WSC may collect from individuals includes, for example, name, email address, address, phone number, financial, claim, and other information individuals choose to provide.

Generally, WSC (or its authorized representative or agent) collects personal information directly from the individual to whom it relates.

Sometimes personal information is provided to WSC which relates to individuals who are associated with a WSC customer (such as the principals or shareholders of a corporation). Where such personal information is provided by someone other than the individual to whom it relates, WSC confirms in writing the authority of such person to provide the information.

WSC also collects personal information from third parties such as credit reporting agencies, financial institutions and personal references. WSC obtains an individual's express consent before collecting personal information from such third parties. This consent is generally obtained as part of the application process for WSC products or services.

It is important to note that this privacy statement is intended to supplement, and does not replace, any express consents given to WSC in connection with WSC's collection, use and disclosure of personal information.

## **When does WSC use or disclose personal information?**

WSC only uses or discloses personal information as required to facilitate the authorized purposes listed above. WSC does not otherwise disclose personal information unless it has the consent of the individual to whom the personal information relates. **WSC does not rent, sell or trade customer lists.**

In some cases, WSC may share personal information with its affiliates or with third party service providers performing functions on WSC's behalf, including, for example, vendors that provide information technology services or provide analytics or assessment services.

## **Does WSC collect personal information on its web site?**

WSC does not collect personally identifiable information through its web site unless such information is provided to WSC by e-mail (or "contact us" style of form) via the WSC web site.

WSC will only use such personal information for the purposes of responding to the e-mail or providing updates about WSC products and services if that is what has been requested.

WSC will not disclose to third parties any such personal information unless:

- WSC has your consent
- WSC a good faith belief that disclosure of the information is necessary to protect the rights or property of WSC
- WSC is required by law

Visitors should also be aware that anonymous technical information may be collected by WSC as a result of a visit to the WSC website. For example, this information may include the visitor's IP address, browser type, operating system, domain name, access times and referring website addresses. WSC uses this anonymous technical information for purposes such as diagnosing problems with WSC servers, improving the operation and content of the WSC website and compiling aggregate and statistical information.

WSC will not attempt to link or match such anonymous technical information with any personally-identifiable information unless:

- WSC has your consent
- WSC (or its service providers) have detected or reasonably suspect any attempt to damage the WSC website or other security breach
- WSC is required by law.

WSC may use "cookies" on its website. "Cookies" are small text files placed on your computer that can collect and store a variety of information. Permanent cookies are stored indefinitely on a user's hard drive unless manually deleted, while temporary cookies are automatically deleted from the user's browser upon logging out of a website. Web browsers typically allow users to disable permanent and/or temporary cookies.

Please note that WSC may use Google Analytics. For more information about how Google collects, uses, and processes data, please see: <http://www.google.com/policies/privacy/partners/>.

Please note that WSC's website may contain links to other websites. WSC is not responsible for the privacy practices used or followed by other websites. You are encouraged to be aware of when you leave WSC's website, and to read the privacy statements of each and every website you may visit that may collect personal information from you.

### **Is there a choice?**

Individuals provide their consent to the collection, use, and disclosure of personal information by WSC when they provide their information to WSC or use its services.

Individuals can deny or withdraw their consent to WSC's collection, use and disclosure of their personal information at any time upon reasonable notice, subject to any legal or contractual requirements. However, if consent is denied or withdrawn, WSC may not be able to provide the WSC products or services applied for or purchased.

WSC and its affiliates may use personal information to inform individuals of current and/or new services or other developments that WSC or its affiliates or partners believe will be of interest to individuals in accordance with applicable laws including Canada's Anti-Spam Legislation. Such communications may be made by way of telephone, text message, direct messaging, e-mail, fax or regular mail. Individuals provide their consent to WSC and its affiliates and partners contacting them in this manner when they use WSC's services. Individuals may opt-out of receiving such communications by contacting WSC at the address below.

## **How does WSC protect the security of personal information?**

WSC has in place reasonable policies, procedures and safeguards (including physical, technological and organizational measures) designed to protect the security of personal information under its control.

The protection of personal information is of paramount concern to WSC, and WSC is prepared to take appropriate and timely steps in the event of any incidents involving personal information in accordance with applicable privacy laws.

WSC makes every reasonable effort to ensure that personal information is accurate and complete. This may involve requesting further information or updates from individuals. WSC relies on individuals to notify WSC if there is a change to their personal information that may affect their relationship with WSC.

WSC retains personal information only as long as is reasonable to fulfill the purposes for which the information was collected, or for legal or business purposes.

## **Does WSC provide access to personal information?**

WSC provides individuals with access to the personal information WSC holds about them in accordance with applicable laws. WSC reserves the right to require that any request for access to personal information be made in writing. Generally, there is no cost for such access. However, WSC reserves the right to charge such costs on a case by case basis in accordance with applicable laws. The individual will be notified in advance if such charges apply.

WSC will correct or amend the personal information in its files where it can be shown that the information is incorrect or incomplete.

## **Storage and Processing**

WSC will store the personal information on its internal servers and/or with its services providers.

WSC's service providers may store and/or process personal information outside of Canada (including in the United States of America). When information is stored or processed outside of Canada, it may be subject to the laws of and be accessible by legal authorities in such other jurisdictions. WSC has taken appropriate technical, organizational, and legal steps to secure this information.

WSC uses Adobe Sign to send, sign, and manage electronic signatures. Where Adobe Sign is used, information may be stored or processed in the United States of America during the signature process. For more information about Adobe Sign's privacy practices, please see Adobe's Privacy Policy at <https://www.adobe.com/ca/privacy/policy.html> and <https://www.adobe.com/ca/privacy/policies-business/esign.html>.

## **Contact WSC**

For further information about WSC's privacy practices or to make a request for access to personal information or exercise any other rights outlined in this Privacy Policy, please contact WSC's Privacy Officer at the following address:

Western Surety Company  
2100 - 1881 Scarth Street  
Regina, Saskatchewan  
S4P 4K9

**ATTENTION: James Toothill, Privacy Officer**

Telephone: (306) 777-0608  
E-mail: [jtoothill@westernsurety.ca](mailto:jtoothill@westernsurety.ca)

The foregoing policy is effective as of October 27, 2021. WSC reserves the right to change this Privacy Policy at any time in accordance with applicable laws – please check our website for updates to this Privacy Policy.