

ANALYSIS
STRATEGY
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# **Confidentiality and Privacy Policy**

JDM Actuarial Expert Services Inc. (JDM Actuarial) respects and protects the privacy and confidentiality of all information provided to us. The following policy is applied to all consulting services and information provided to us.

### **Purpose**

To set out how JDM Actuarial handles confidential information and complies with the personal privacy legislation applicable.

## Information

"Information" refers to any document, letter, email, spreadsheet, personal data or other information provided by you or your authorized representative to JDM Actuarial during or in contemplation of us providing services to you.

"Confidential Information" refers to any Information of a personal nature (your's or another person's), and Information that is not publicly known.

# **Privacy Act**

"Privacy Act" refers to the federal Personal Information Protection and Electronic Documents Act (PIPEDA) and/or a provincial privacy act, such as the Ontario Freedom of Information and Protection of Privacy Act (FIPPA) whichever may apply to your data.

## **Required Information**

JDM Actuarial will request and retain only information reasonably believed to be required to perform the services you request of us. Should we be provided with information not required or not requested, we will either return it to you or destroy it as you may direct.

#### Information Disclosure to Third Parties

Subject to the following paragraph, JDM Actuarial will not disclose any of your Information to third parties unless you have previously provided your consent.

Your Information may be disclosed to staff of JDM Actuarial to the extent required for performance of our services. To the extent required, your Information will be disclosed if required by law or a court order, however, we will inform you prior to such disclosure when possible.

#### **Record Retention**

Information provided to us may be retained indefinitely for legal purposes. If there is any information that you specifically wish to be returned or destroyed at some specific time, you must advise us in writing and preferably at the start of the engagement or upon provision of the information.

If any of the information you provide to us is subject to a Privacy Act, we will return it to you or destroy it once that information is no longer required to perform the work requested of us.



However, if that information could be germane to a legal issue in the future, we will not destroy it unless you provide us with a release.

At all times while we retain information or personal data, it will remain covered by our confidentiality and privacy policy.

# Security

At JDM Actuarial, we store all Information on site where we will ensure that only authorized staff has access to it. Electronic data is encrypted at all times on our systems. JDM Actuarial will not store any Information offsite or on third party servers unless we previously advise you.

Because information sent over the Internet is not secure, if we need to send you an email with any Information in it, we will protect it with a password that will be provided to you separately. Should you require a greater level of security in our communications, please advise us.

We destroy paper files containing Information by shredding. We destroy electronic information by deleting it. When the medium on which electronic Information was stored is to be discarded, it is physically destroyed. Should another method of destruction be requested, please advise us.