



Privacy Policy

Arthur J. Gallagher & Co.'s Canadian subsidiaries, including but not limited to Arthur J. Gallagher Canada Limited, Gallagher Benefit Services (Canada) Group Inc., and Gallagher Bassett Canada Inc. ("we", "our" and "us") are engaged in providing insurance brokerage, consulting, and third-party property/casualty claims settlement and administration services. This Privacy Statement describes in general terms how we may collect, use and disclose personal information to provide our services to you. This Privacy Statement applies to any personal information we collect or receive about you, from any source. This Privacy Statement may be amended from time-to-time and is current as of the "last updated" date.

Personal Information

'Personal information' means information about an identifiable individual. To meet your needs and serve you, we may collect your personal information from you and others, the details of which can differ depending on the types of insurance, claims services/handling and financial services you require. Examples of personal information that we may collect, use and disclose include your name, contact information (address, phone number, email address), birth date, income, insurance needs, and health/medical information. Personal information does not include certain business contact information.

Our Collection, Use and Disclosure of Personal Information

In most cases, we will collect personal information directly from you when you purchase or interact with us about a product or service that we offer or provide. In some cases, we may collect personal information from a third party based on your consent or as otherwise permitted by law. The purposes for which we collect, use and disclose personal information include:

- To understand your needs.
- To analyze the suitability of our insurance and financial products or services for you.
- To determine your eligibility for products and services.
- To set up, manage and offer products and services that meet your needs.
- To provide you with ongoing service.
- To advise you of information, products and services, which may better serve your needs.
- To meet our legal and regulatory requirements.
- To facilitate the underwriting process and insurance claims.
- To conduct negotiations with underwriters or insurers on your behalf.
- To receive payments.

- To allow for more meaningful and useful sales and marketing initiatives.
- To use Google Analytics and other similar analytics service providers to better understand our web traffic and marketing effectiveness.
- To collect opinions and comments regarding our operations.
- To correspond with you, notify you of events or changes to our service, or otherwise respond to your queries and requests for information, which may include marketing to you.
- To advise, improve, or develop products and services through data analysis, e.g., understanding clients' risk exposures, crafting solutions and appropriate insurance coverage, limits, deductibles based on historical dataset.
- To investigate claims.
- Such purposes for which we may obtain consent from time to time.
- Any other uses that may be permitted or required by applicable law.

We will typically identify to you the purposes for which we may collect, use and disclose your personal information at the time that we collect such information. We will obtain your consent for such purposes at or before the time that we collect, use or disclose your personal information, except where permitted or required by law. If we wish to use your personal information for a purpose that is not compatible with the purpose for which it was collected, we will request your consent. In all cases, we balance our legal use of your personal information with your interests, rights, and freedoms in accordance with applicable laws and regulations to ensure that your personal information is not subject to unnecessary risk.

We keep the personal information that we collect at our offices, at the offices of our affiliates, brokers, claims and third party service providers, or at data centers managed by us or our third party services providers in Canada, the United States, and India, as applicable.

We may transfer your personal information to third party service providers with whom we have a contractual agreement that includes appropriate privacy standards, where such third parties are assisting us with the aforementioned purposes.

By seeking or purchasing insurance, financial services, or claims services you are providing your express or implied consent to the collection, use, and disclosure of personal information for the above purposes depending upon on the types of insurance and services you require. For example, if you are seeking insurance, we will typically disclose your personal information to underwriters and insurers for the purpose of conducting negotiations on your behalf or to secure a product or service for you. If you are making or may be making an insurance claim, we may



disclose your personal information to insurers and claims adjusters for the purpose of administering a claim or potential claim.

With your consent or where permitted by law, our brokers may share your personal information with one another for the purpose of informing you about additional products and services. We may also share personal information with our related group of companies in order to fulfill the purposes that you have consented to. We may also share your personal information with third party service providers as necessary for them to provide services on our behalf. In addition, we may send personal information to service providers located outside of Canada, in the United States and India, including for storage and processing in accordance with the aforementioned purposes. However, you should note that to the extent that any personal information is outside of Canada, it is subject to the laws of the country in which it is held, and may be subject to disclosure to the governments, courts or law enforcement or regulatory agencies of such other country, pursuant to the laws of such country.

We may make disclosures of personal information to a potential purchaser in connection with a transaction involving the sale of some or all of our business (in which case the use of your personal information by the new entity would continue to be limited by applicable law), or as otherwise permitted or required by law.

Withdrawing Consent

Subject to legal and contractual requirements, you can refuse to consent to our collection, use or disclosure of information about you, or withdraw your consent to our further collection, use or disclosure of information at any time by giving us reasonable notice in writing using the contact information indicated below. However, we may not be able to provide, or continue to provide, you with some products, services or information of value to you. Please ask us about this if you are considering refusing or withdrawing your consent. If you withdraw your consent, we may no longer be able to provide you with some of our services.

Retaining and Safeguarding Personal Information

We retain personal information for as long as necessary to fulfill the purposes for which it was collected and as permitted or required by law. We have implemented physical, organizational, contractual and technological measures to help protect your personal information from loss or theft, and unauthorized access, disclosure, copying, use or modification. The only employees, who are granted access to your personal information, are those whose duties reasonably require access to such information.



Website Usage Information

From time to time, we collect certain usage information from our servers that relates to the use of our websites, including but not limited to Internet Protocol addresses, Internet domain names, the web browser and operating system used to access the website, the files visited, the time spent in each file, and the time and date of each visit. We use this information to improve our website, for example by enhancing pages or features that are visited frequently, and on occasion we may share this information with our affiliates or other third party companies to provide them with an indication of the amount of interest in our website for advertising purposes and to help us plan for technical improvements.

Your Obligation to Update Your Information

While we try to ensure that the information we hold about you is accurate, complete and up-to-date, it is in your obligation to inform us (using the contact information below), or your broker, promptly of a change of name, address or any other relevant personal information. We will not routinely update your personal information, unless such a process is necessary or as permitted or required by law. We expect you, from time to time, to supply us with written updates to your personal information, when required. This may be very important because inaccurate, incomplete or out-of-date information may have an adverse effect on your ability to obtain, or be eligible for, certain products and services. If you believe that personal information we hold about you may be inaccurate, you are obligated to contact us so that we may update our records. If you successfully demonstrate that your personal information in our records is inaccurate or incomplete, we will amend the personal information as required. Where appropriate, we will transmit the amended information to third parties having access to your personal information.

Questions and Requesting Access to Personal Information

If you have any questions about our privacy policies and procedures, or to request access to personal information which we hold about you, that we have collected, utilized or disclosed, please submit a written request to us at the contact information below.

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Gallagher

Insurance | Risk Management | Consulting

Email: Gallagher Brokerage: canada.compliance@ajg.com

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Email: Gallagher Bassett: gb.canada.compliance@gbtpa.com

Routine requests for access to basic personal information may also be submitted to your broker or consultant. Requests will be processed in accordance with applicable law. We will make such personal information available to you in a form that is generally understandable, and will explain any abbreviations or codes.

We will attempt to respond to each of your written requests not later than thirty (30) days after receipt of such requests. We will advise you in writing if we cannot meet your requests within this time limit. We will not charge any costs for you to access your personal information in our records without first providing you with an estimate of the approximate costs, if any.

We may request that you provide sufficient identification to permit access to the existence, use or disclosure of your personal information. Any such identifying information shall be used only for this purpose or other purposes as may be permitted or required by law.