



INTRODUCTION

Rocca Dickson Andreis Inc. is a Property and Casualty insurance broker that has made a commitment to respect the privacy and rights of our clients. We are ensuring that our clients' personal information is collected, used and disclosed in such a manner that a reasonable person would consider appropriate.

Rocca Dickson Andreis Inc. has created this handbook based on the principles and rules set out in the federal Personal Information Protection and Electronic Documents Act (PIPEDA). This act came into force on January 1, 2001 and began to apply to certain business and activates on that date. As of January 1, 2004 this act will also apply to all insurance brokerages.

ACCOUNTABILITY

RDA is responsible for all Personal Information under our control and has appointed a Privacy Officer who is accountable to Senior Management for RDA's compliance with this policy. The individual appointed will have sufficient authority within the organization to ensure compliance.

You may contact our Privacy Officer:

Title: Privacy Officer	Telephone: 905-652-8680
Name of Organization: Rocca Dickson Andreis Inc.	Fax: 905-652-8688
Address: 290 Rowntree Dairy Rd, Woodbridge, ON L4L 9J7	E-mail: privacyofficer@rdainsurance.com

We commit to our clients that we will

- protect personal information;
- allow individuals to request information, change their personal information; and file complaints against the Broker with our Privacy Officer;
- provide education and training to our staff
- provide a privacy brochure that explains our procedures to the public

RDA will use all reasonable means to make sure that the clients Personal Information is protected while processed by a third party.

IDENTIFIED PURPOSES

RDA will identify the purposes for which we collect Personal Information at or before the time information is collected and we will identify the purpose for which this information will be used.

RDA may identify such purposes either orally or in writing. We will attempt to provide notification in writing whenever practical. We will collect information for the following reasons:

- enables RDA to procure on behalf of a Client a new policy of insurance;
- allows RDA to renew a policy of insurance with the incumbent carrier or to solicit a renewal from other insurance carriers;
- allows RDA to assist the Client in assessing ongoing insurance needs
- allows RDA to assess the Client's needs for additional products including financial products
- ensure that the Clients information is current and accurate;
- protects RDA and /or the Insurer against inaccuracy

RDA reserves the right to explain to the Client orally for what purposes the clients Personal Information will be used. Once we have done this, we will place a note in the clients file indicating what we have done.

RDA will obtain prior consent for any new identified purpose for which the Client's Personal Information will be used.

CONSENT

Your knowledge and consent of RDA's collection, use and disclosure of your Personal Information is critical. We rely on the following actions by our Clients as indication of their consent:

- the voluntary provision of Personal Information to RDA for the purpose of acquiring or renewing an insurance policy or financial product:
- your express written consent
- your express oral consent in person or by telephone (a note will added to the Client's file indicating that consent was received orally)
- your consent or acknowledgment via electronic transfer

Subject to legal exceptions, you may withdraw consent at any time. Withdrawal of your consent may be in writing. In some cases, your refusal to provide certain personal Information or withdrawing consent for RDA to use or disclose your Personal Information may result in RDA being unable to provide you with insurance coverage or other requested products or services

LIMITING COLLECTION AND RETENTION OF PERSONAL INFORMATION

The Personal Information that RDA will collect will be limited to that which is necessary for the identified purposes or as required by law:

- RDA will only collect Personal Information for the identified purposes
- RDA will only collect information by fair and lawful means:
- RDA will, on a regular basis communicate to staff the limitations on the collection of Personal Information along with the policies and procedures associated with the collection of said information;
- RDA will only retain information for as long as is necessary for the fulfillment for the purpose it was intended
- RDA will abide by the industry standards in the Province of Ontario regarding the length of time required to keep information;
- RDA will also abide by legal requirements and keep Personal Information as mandated by applicable laws;
- RDA will maintain Personal Information that has been used to make a decision about an individual long enough for individuals to have access to their information but in no event will we keep the information longer than applicable industry standards;
- RDA will destroy, delete or render viewless, Personal Information that is no longer required;

ACCURACY

RDA will maintain your Personal Information as accurate, complete and as up-to-date as is necessary for the Identified Purposes.

- RDA will ensure that the Personal Information under our control is accurate and complete and will do so on an ongoing basis;
- RDA expects that Personal Information provided to us by Individuals will be accurate and complete;
- RDA considers regular updating of Personal Information a necessary requirement for the purpose of providing our customers with appropriate insurance coverage;
- RDA will at all times, minimize the possibility of inappropriate information being used in the decision making process:

RDA will establish the following process to ensure the accuracy and completeness of the information being used:

- Ensure initial collection of information from Client is accurate;
- Client will be asked to verify the accuracy and completeness of the information provided;
- Regularly review the information;
- RDA will verify accuracy by contacting third parties including but not limited too Department of Motor Vehicles and Driver Licensing, by ordering CANVID, HITS, etc.

SAFEGUARDS

RDA will protect your Personal Information by using security safeguards appropriate to the sensitivity of the information. Safeguards will vary depending on the sensitivity, format, location and storage of the information.

Safeguards will be established based on the following factors:

- Manner in which information is stored;
- Format of the information;
- Amount of information;
- Sensitivity of information;
- Parties that will receive the information.

Regardless of the format in which Personal Information is held, RDA will protect against the loss, theft, unauthorized access, modification, copying, use or disclosure of the Personal Information on hand using the highest level of protection necessary based on the sensitivity of the information.

OPENNESS

RDA will make available to individuals specific information about our policies and procedures relating to the management of Personal Information, which is under our control.

RDA will make information available to our clients regarding our policies and procedures in one or more of the following ways:

- Making available Privacy brochure;
- Through our website;
- Mailing out information
- Delivering information

RDA will make certain that all Individuals will have reasonable access to our policies and procedures and this information will be made readily available to them.

RDA will provide training to all staff members ensuring that they become familiar with our Privacy policies and procedures and at the same time provide them with the name of our Privacy Officer and contact details.

RDA will make the following information available to the public:

- The name or title of our Privacy officer including contact information;
- Written information describing our policies and practices;
- How to gain access to Personal Information;
- A description of the type of personal information held by RDA;
- A description of the type of Personal Information RDA makes available to insurance; companies and other interested third parties.

CLIENT ACCESS

An individual upon request will be advised of the existence, use and disclosure of his or her Personal Information, which is under our control and may be given access to and challenge the accuracy and completeness of that information.

Access given will vary based on the format in which the information is held (i.e. hard or soft copy) the amount of information held or other factors. In the event that there is a large volume of information, instead of providing the entire file, a synopsis may be provided.

In order to get access to their Personal Information, the procedure for making a request is as follows:

- All requests must be made in writing using the RDA request / complaint form;
- RDA will respond to requests within a reasonable period of time;
- RDA will provide reasons for refusal in writing to any individual requesting Personal Information;
- RDA will advise what actions the Client may take, including the filing of a formal complaint with Privacy Commissioner of Canada www.privcom.gc.ca
- RDA may request payment of reasonable administrative costs that may be incurred when preparing a response

There are some exceptions that will preclude RDA from providing access to personal information. These exceptions may include any of the following:

- Information about another person may be revealed
- Information was collected without consent in order to investigate a legal matter,
- fraudulent act or the breaching of an agreement;
- Confidential information may be revealed;
- Individual security

CHALLENGING COMPLIANCE

An individual may address a challenge concerning compliance with the above policies and procedures with our Privacy Officer.

Upon request any individual who wishes to make or file a complaint regarding the manner in which we handled their Personal Information, will be informed how they can proceed with the filing of their complaint.

Any complaint filed by an individual must be done in writing by completing the RDA request / complaint form which will provide RDA with the basic information and description and nature of the complaint.

Once RDA receives a completed RDA request / complaint form, the procedure to investigate the complaint filed against RDA is as follows:

- Acknowledge receipt of the complaint;
- An investigator will be assigned to investigate the complaint;
- The investigator will be given unrestricted access to all necessary files, individuals, records and reports;
- Where appropriate, we will clarify facts directly with the complainant;
- Once our investigation is complete, we will respond to the complainant in writing advising our findings and the outcome of our investigation including steps taken to correct the problem, if any.

RDA will document all complaints received from our clients as well as the actions that we have taken in response to the complaints. All details will be noted in individual's files.

RDA will establish a master Privacy file that will contain all complaints brought against our organization regarding the handling of Personal Information including all responses.