



OUR COMMITMENT TO PRIVACY

BBD'S COMMITMENT TO PRIVACY

Protecting your privacy and the confidentiality of your personal information has always been fundamental to the way we do business and is the responsibility of every employee of BBD Inc. As Canada's leading administered benefits agency, we strive to provide you with the best customer service. The range of products and services we offer our groups and benefit plan participants continues to expand and the technology we use continues to change. But, no matter how our business changes, we are committed to protecting and respecting your right to privacy and confidentiality.

OUR COMMITMENT TO PRIVACY

BBD is committed to the protection of any personal information collected by it or in its custody, including any information transferred to a third party to fulfill the purposes for which the information was collected.

Personal information includes any information, recorded or not, about an identifiable individual. Examples of personal information that are identifiable include names, age, sex, social insurance numbers, health status, health history, financial information, benefit claims data, etc. It also includes information which can be matched with other information in order to establish an individual's identity.

BBD'S PRIVACY CODE

Our privacy code informs you of our policies and procedures on privacy and tells you about the ways we ensure that your privacy and the confidentiality of your personal information is protected. The code is based on the Model Code for the Protection of Personal Information, a nationally recognized standard developed by the Canadian Standards Association (CSA). Our adoption of this code sends a powerful message to the general public that we have policies and procedures in place that control the collection, use and disclosure of personal information; it also reinforces our existing commitment to customer service.

Our privacy code balances the privacy rights of our groups and benefit plan participants, and our employees with the legitimate information requirements to provide customer service and to meet our human resource requirements. It consists of the following key principles:

1. We ask for your personal information for the following purposes:

- To establish your identification.
- To provide you and/or your dependants with the applicable benefit coverage.
- To protect you and us from error and fraud
- To provide ongoing services

2. Consent

When you first become a group and benefit plan participant of Benefits by Design, your personal information is obtained and used only with your consent. We obtain your consent before we:

- provide benefit coverage.
- offer you other BBD services.
- obtain, use or disclose to other persons, information about you unless we are obliged to do so by law or to protect our interests.
- use your personal information in any way we did not inform you about previously.

Your consent can be either express or implied. Express consent can be verbal or written. For example, when you sign an enrollment form you are giving us written consent to use your personal information to provide you and/or your dependents with benefits; when you submit a claims form, you are giving us written consent to use your personal information to reimburse you for benefit costs that you incur.

Consent can be implied or inferred from certain actions. For example, if you present your benefit identification card to a pharmacist/dentist in lieu of paying for a prescription/dental procedure, it can be implied as consent for the pharmacist/dentist to provide your personal information to the insurer to obtain payment for the service rendered, and for the insurer to process the related claim for payment.

For our existing groups and benefit plan participants, we will continue to use and disclose your personal information previously collected in accordance with our current privacy code, unless you inform us otherwise. We will infer that consent has been obtained for the continued use or disclosure of your personal information by the processing of any existing or future benefit claims that you submit for reimbursement.

3. Withdrawal of Consent

You can withdraw your consent any time after you've given it to us, provided there are no legal or regulatory requirements to prevent this. If you do not consent to certain uses of personal information, or if you withdraw your consent, we will not be able to administer your benefit coverage. If so, we will explain the situation to you to help you with your decision.

4. Exceptions to Consent

We may collect, use or disclose personal information without your consent only:

- (a) for an emergency that threatens your life, health or security. We will subsequently inform you of this disclosure.

- (b) if we must disclose personal information for legal reasons. We may be compelled to release this information by a court of law or other legal or regulatory authority. If so, our policy is to disclose the information only to the extent required.
- (c) where collection is required to investigate inappropriate activity, such as the submission of fraudulent information, and the knowledge and consent of the individual would compromise the availability or accuracy of the information.

5. We Protect Your Personal Information From Error, Loss and Unauthorized Access

Our employees who have access to your personal information are made aware of how to keep it confidential. As a condition of employment with Benefits by Design Inc., each employee signs an Agreement requiring all information that they have access to be treated confidentially. We have security standards to protect our systems and your personal information against unauthorized access and use. This protects your personal information at all times when it is stored in data files or handled by our employees.

6. Your Personal Information is Destroyed When It Is No Longer Needed

We keep your personal information only so long as we need it for the products and services you are using, to offer you products and services when you are a group and benefit plan participant and for a reasonable time thereafter, or to meet any legal, regulatory, or tax requirements. We have retention standards, which meet these requirements. We destroy your personal information when it is no longer needed, or we remove your name from the information.

7. You Can Obtain and Verify the Accuracy of Your Personal Information

You can check your personal information to verify its accuracy. To update and correct it, and to have any incorrect information removed, you must tell your plan sponsor to advise us of these changes. You can ask our Customer Service Representatives by phone at **1-800-668-2295** to obtain the personal information we hold about you, or do so in person by visiting our head office in Port Coquitlam, British Columbia.

There is no charge for verifying or correcting your personal information. Depending on the circumstances, there may be a minimal charge for personal information that you request. We will inform you if there is a charge.

Please note that we may not be able to provide information about you from our records if it contains references to other persons, is subject to legal privilege, contains information proprietary to BBD, is too costly to retrieve, or cannot be disclosed for other legal reasons. If we have obtained information about you from other people, upon your request, we will let you know the person or organization we got it from.

8. We Correct your Personal Information

Whenever possible, we will correct any personal information which we may have given to an outside organization. If a third party, such as an insurer has given us personal information which you tell us is wrong, we will give you the name and address of that party so that you can correct the information.

9. You can find out to whom we have given information about you

If you ask, we will let you know the names of outside companies or organizations we've given personal information to, or direct you to the appropriate individual to ask for such information.

10. We Respond to Your Request Promptly

We will deal quickly with your request to see your personal information and always respond to you promptly.

11. We protect other people's privacy when we make personal information available to you.

There may be files that include information about you and other benefit plan participants, or that have information confidential to BBD or are the property of BBD. Because we must protect everyone's confidentiality and legal rights, we cannot make these files available to persons outside of BBD. However, we will make available to you any factual information about you contained in such files.

12. We monitor our compliance with the BBD Privacy Code and are committed to upholding this Code.

We have policies and procedures in place to assist our employees in adhering to the BBD Privacy Code. Our internal audit department monitors the adherence to this Code on a regular basis.

If you have any questions or complaints about our Privacy Code, or about how we are living up to them, let us know right away.

13. Resolving Your Concerns Are Important To Us

BBD is committed to treating you with the greatest respect and consideration, and providing the highest level of service. If you have any concerns or questions about privacy and confidentiality – or any other concerns about the way a request for personal information was handled, you can take the following actions:

Contact the BBD Privacy Officer

Call the Office of the BBD Privacy Officer – **1-604-464-0313** or toll free at **1-800-668-2295**

Or write to: **Privacy Officer
BBD Inc
500-2755 Lougheed Highway
Port Coquitlam, BC V3B 5Y9**

FAX the Office of the BBD Privacy Officer at **1-604-464-7997**

The BBD Privacy Officer's office will acknowledge your complaint. Within two weeks of receiving your enquiry, the BBD Privacy Officer will write or call to tell you the problem has been resolved, or, in more complex cases, advise you what further steps are being taken and when you may expect a resolution.

14. If Your Concern Remains Unresolved

If your concern remains unresolved, please contact:

**The Office of the Privacy Commissioner of Canada
112 Kent Street
Ottawa, Ontario
K1A 1H3**

**Telephone: 1-613-995-8210
Toll Free: 1-800-282-1376
FAX: 1-613-947-6850
WEB SITE: www.privcom.gc.ca
E:mail: info@privcom.gc.ca**