



Privacy Policy – Effective January 2010

This Privacy Policy covers the treatment of personally identifiable information collected by Sirius Benefit Plans. This Privacy Policy is subject to change without notice so it is recommended that you review it regularly. Sirius is committed to respecting the privacy and confidentiality of information it receives in accordance with applicable law. Sirius has established and will continue to maintain reasonable safeguards to protect the security and confidentiality of personal information.

The PIPED Act

The Personal Information Protection and Electronic Documents (PIPED) Act sets out ground rules for how private sector organizations can collect, use or disclose personal information in the course of commercial activities. It balances an individual's right to privacy with the need of organizations to collect, use or disclose personal information for legitimate business purposes.

PIPED Act Outlined:

- If your business wants to collect, use or disclose personal information about people, you need their consent, except in a few specific and limited circumstances
- You can use or disclose people's personal information only for the purpose for which they gave consent
- Even with consent, you have to limit collection, use and disclosure to purposes that a reasonable person would consider appropriate under the circumstances
- Individuals have a right to see the personal information that your business holds about them, and to correct any inaccuracies
- There's oversight, through the Privacy Commissioner of Canada, to ensure that the law is respected, and redress if people's rights are violated

Privacy Guidelines

The following Privacy Guidelines describe our commitment to privacy and explains the principles that guide us in protecting the privacy and confidentiality of personal information. Personal information is information about an identifiable individual. It includes, but is not limited to, health and financial information. The company, its directors, officers and employees, and its licensed representatives and other persons and organizations, who act for, or on behalf of, the Company, are required to comply with these Privacy Guidelines. Access to information is restricted to directors, officers, employees, licensed representatives and other persons and organizations acting for, or on behalf of, the Company, who need the information in order to provide services to the client.

Accountability

Sirius Benefit Plans is responsible for personal information in its control, including information that may be transferred to a service provider performing services for, or on behalf of, Sirius Benefit Plans.

Purpose & Consent

Sirius Benefit Plans identifies the purposes for which it collects personal information either before or at the time of consent. Sirius Benefit Plans will collect, use and disclose personal information only with the consent of the individual, or as otherwise allowed by law. Consent to the collection, uses and disclosure of personal information may be express or implied. Individuals may withdraw their consent at any time, subject to legal or contractual restrictions and considerations.

Collection, Use & Disclosure

Sirius Benefit Plans only collects personal information that is necessary for the purposes identified. Personal information is collected directly from the individual and may with consent or as otherwise allowed by law, be collected from other sources. Personal information is not, without consent, used or disclosed to a third party for any purpose other than that for which it was collected, unless such use or disclosure is required or allowed by law. This may include use or disclosure in order to protect the company's interests in civil proceedings and in proceedings involving criminal activity, fraud or misrepresentation.

Retention of Information

Sirius Benefit Plans retains personal information only as long as necessary to fulfill the identified purpose or as otherwise required or allowed by law.

Accuracy & Maintenance of Information

Sirius Benefit Plans uses reasonable efforts to ensure that personal information is accurate and complete for the purposes of which it is to be used. Sirius Benefit Plans protects the security and confidentiality of personal information with safeguards appropriate to the sensitivity of the information. Personal information is recorded in well-identified physical or electronic files. Physical files are stored in a secured area with limited access and kept safely so that their content remains protected from unauthorized access. Electronic documents are kept on secured databases with restricted, secure access protected by firewalls.

Transparency & Access

Sirius Benefit Plans' Privacy Guidelines are available to clients and the public. Upon written request addressed to our Privacy Officer, we will provide a copy of the guidelines and respond to inquiries about our practices relating to personal information. An individual may request to be informed of the existence, use and disclosure of personal information pertaining to him or her. Sirius Benefit Plans will provide appropriate access to such information that it holds. If Sirius Benefit Plans determines not to provide access to personal information, a detailed explanation will be provided. Individuals may request the correction of personal information the company holds about them, and, if we find that what we have is incorrect, we will correct it.

Concerns, Inquiries or Requests

Any concern, inquiry or request related to privacy should be made in writing. Please send or email to;

Attn: Privacy Officer
Sirius Benefit Plans
3227 Roblin Boulevard
Winnipeg, Manitoba R3R 0C2
sbprivacyofficer@siriusbenefits.ca