

## Privacy Policy

Orion Travel Insurance Company (“Orion”, “we” or “our”) and its affiliated companies, respect the privacy of your personal information.

This Privacy Policy applies to the personal information that Orion collects, uses or discloses in the course of providing travel medical insurance, both online and offline.

### What is personal information?

Personal information means information about an identifiable individual.

### What personal information does Orion collect and use?

Orion collects certain personal information, some of which is detailed and sensitive, in offering and providing travel insurance and related services. Such information includes, but is not limited to:

- details of planned travel within or outside of Canada
- full name and address
- home, cell or business phone numbers
- payment information
- your date of birth and the date of birth of any other traveller covered under your plan if you purchase a family plan;
- your medical records and the medical records of any other traveller covered under your plan if you purchase a family plan; and
- information regarding other travellers, such as their relationship to the insurance policyholder

If you provide Orion with the personal information of other individuals, you confirm that they consent to our collection, use and disclosure of their personal information for the purposes outlined in this policy.

Details relating specifically to information collected on our website or through our mobile application can be found in Internet Security & Privacy section of this document.

Orion will collect personal information directly from applicants, policyholders, insureds and claimants. Orion and its affiliates may also collect personal information from each other in accordance with this policy. Orion may also collect your personal information from third parties in accordance with this policy. For instance, Orion may collect personal information about you from your doctor, healthcare facilities in Canada or abroad, government and private healthcare insurers and from family members and travelling companions of an insured or claimant. Orion may also collect and analyze information from publicly available demographic data in the jurisdictions in which Orion operates.

### How does Orion use personal information?

Orion may use your personal information to:

- Process, administer and manage your emergency travel medical policies and trip cancellation and interruption;
- determine eligibility for, and provide requested products or services;
- better understand your needs and the ways in which we can improve our products and services;
- establish and maintain communication with you, including responding to your inquiries;
- investigate claims and determine eligibility for insurance benefits;
- process payments;

- provide travel assistance services;
- meet any legal, regulatory, processing or security requirement that requires collection, use or disclosure of your personal information;
- inform you about products and services that we offer;
- analyze your use of Orion's products and services;
- investigate and prevent fraud; and
- conduct surveys or research for the internal use of Orion and its affiliates only.

If Orion requests additional personal information or intends to use or disclose your personal information differently than described in this Privacy Policy, we will advise you at or before the time of collection, use or disclosure (as the case may be) as to how we will handle that personal information, and obtain your consent.

### **How does Orion use service providers?**

Orion may use service providers to perform certain services on our behalf. For example, we may use service providers to authorize and process payments, send email or other communications, run contests, conduct customer research or manage and analyze data. Our service providers are only given the information they need to perform their designated functions, and they are not authorized to use or disclose personal information for their own marketing or other purposes. We require all service providers to keep your information confidential and secure and to have privacy standards and security standards relating to personal information that are comparable to those of Orion.

Your personal information may be processed and stored in countries other than Canada, and may be accessible to the governments, courts or law enforcement or regulatory agencies of such countries. For written information about Orion's policies and procedures with respect to the use of service providers outside Canada, or if you have questions about the collection, use, disclosure or storage of personal information by service providers outside Canada on behalf of Orion, please contact the Chief Privacy Officer using the contact information set out below.

### **How does Orion disclose personal information?**

We will not disclose, trade, rent, sell or otherwise transfer your personal information, without your consent, except as otherwise set out herein.

**Affiliates:** Orion may share your personal information with our affiliates and with our suppliers of goods and services, representatives, distributors, reinsurers and authorized administrators, which are responsible for administering or providing products and services on our behalf.

**Sale of Business:** We may transfer your personal information as an asset in connection with any contemplated or actual sale, merger or other disposal of all or part of our business or assets, or as part of a corporate reorganization or other change in corporate control, including for the purposes of determining whether to proceed with such transaction or fulfilling any records or other reporting requirements to such parties. In such circumstances, we will ensure that any transfer of personal information is subject to strict data protection security protocols.

**Legal:** Orion, its Canadian and non-Canadian service providers, may provide your personal information in response to a search warrant or other legally valid inquiry or order, or to an investigative body in the case of a breach of an agreement or contravention of law, or as otherwise required by applicable Canadian or foreign law. We may also disclose personal information where necessary for the establishment, exercise or defence of legal

claims, to investigate or prevent actual or suspected loss or harm to persons or property, or as otherwise required or permitted by law.

### **Optional Marketing Purposes**

Occasionally, Orion and its affiliates may send you information about new and existing services and benefits that we offer. If you do not wish to receive such offers, please complete an Opt-Out Form and send it back to us. An Opt-Out Form can be obtained directly on our website at [www.CAASCO.com/privacy](http://www.CAASCO.com/privacy), or by visiting one of our store locations or by calling our toll free number at 1-800-268-3750. You may change your preferences with respect to these optional marketing purposes at any time.

### **How will Orion protect my personal information?**

Only authorized Orion employees and agents who need your personal information to provide you with the products and services requested will have access to your personal information, unless access by others is authorized by this policy or applicable law. Orion takes numerous steps to protect your personal information against loss, theft and unauthorized access, use, alteration, duplication, destruction or disclosure. Such controls include technological, physical and organizational safeguards, depending on the sensitivity and the format of the information. If you are transmitting personal information electronically, please review the Internet Security & Privacy section of this policy.

Orion will destroy, erase or render anonymous personal information no longer required for the stated purposes or for a legal or legitimate business requirement.

### **How do I access or correct my personal information, or make inquiries or submit comments to Orion?**

You have the right to access, update, and correct inaccuracies in your personal information in our custody and control, subject to certain exceptions prescribed by law. If you wish to update or request access to, or correction of, your personal information in Orion's records, or to make inquiries or complaints, please contact our Chief Privacy Officer in writing at:

Chief Privacy Officer  
Orion Travel Insurance Company  
60 Commerce Valley Drive East  
Thornhill, Ontario L3T 7P9  
Tel: 905-747-4900 ext 25043  
Fax: 905-771-3357  
Email: [Privacy@caasco.ca](mailto:Privacy@caasco.ca)

We may request certain personal information for the purposes of verifying the identity of an individual seeking access to his or her personal information records. Some information may not be accessed or disclosed in certain circumstances, for example, if the information requested contains personal information of other persons or for other legal reasons.

If you have any inquiries or comments regarding this Privacy Policy or Orion's privacy practices, please write to or contact our Chief Privacy Officer at the same addresses listed above.

### **Changes to this Privacy Policy**

Orion reserves the right to change this Privacy Policy from time to time. If this Privacy Policy changes materially, we will take reasonable measures to notify you, including posting a copy of the revision on our website at [www.oriontravelinsurance.ca/privacy](http://www.oriontravelinsurance.ca/privacy). Accordingly, we recommend that you review this Privacy Policy from time to time.

### **Internet Security, Mobile Application & Privacy**

In general, you may visit [www.oriontravelinsurance.ca](http://www.oriontravelinsurance.ca) or use of our mobile applications without telling us who you are or actively submitting any personal information. However, we collect the IP (Internet Protocol) addresses of all visitors to our website and other related information such as page requests, browser type, operating system and average time spent on our Website. We use this information to help us understand our Website activity, and to monitor and improve our Website.

To access our products and services on-line, Orion requires you to identify yourself. Orion uses “cookies” to identify you as a registered and/or returning visitor. Cookies are files sent from a website to a visitor’s computer which may then be stored on your hard drive so we can recognize you when you return. Orion uses both session and permanent cookies. These cookies entitle members to enter member exclusive areas of the website and also to “welcome back” members with pre-established member exclusive privileges. This data is used for generation of statistics and to personalize future visits or communications. We use cookies, pixels and pixel tracking on the pages of our website where you are prompted to log in or that are customizable for the collection of aggregate data. If you have registered with our website, these cookies (1) may let us know who you are, (2) may be necessary to access your account information (stored on our computers) in order to deliver products and personalized services, and (3) will provide us with information that we will use to personalize our website in accordance with your preferences. You may set your web browser either to notify you when you receive a cookie or to not accept certain cookies, however, without enabling cookies, you may not be able to take advantage of certain features of the website.

### **When you leave our Website or Mobile Application**

This policy discloses the privacy practices for our website and mobile application. However, our site contains links to other sites that Orion and its affiliates do not own or operate. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. Once you link to another website, you are subject to the privacy and security policies of the new site. We encourage you to read the privacy policies of all websites you visit, especially if you share any personal information. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your personal information.

This Privacy Policy was last revised June 2013.