# Privacy Policy

Edge Mutual Insurance Company

**Effective date:** January 1, 2024  **Last updated:** October 14, 2026

## 1. Purpose and Scope

Edge Mutual Insurance Company ("we," "us," or "our") is committed to protecting personal information in accordance with the Personal Information Protection and Electronic Documents Act ("PIPEDA"), applicable provincial laws, regulatory guidance, and recognized insurance-industry practices.

This policy explains how we collect, use, disclose, retain, safeguard, and provide access to personal information. It applies to applicants, policyholders, insured persons, claimants, beneficiaries, witnesses, brokers, agents, service providers, website visitors, social media users, employees, and other individuals whose information we handle.

It applies across all channels, including in person, mail, telephone, email, websites, online portals, mobile applications, video meetings, social media pages and feeds, direct messages, chat, text messaging (SMS/MMS), and other electronic communications.

## 2. Meaning of Personal Information

Personal information is information about an identifiable individual. Depending on the relationship and transaction, it may include contact and identity information; date of birth; household and property details; financial and payment information; insurance history; policy and coverage information; driving and vehicle records; claims, loss, medical, employment, and litigation information; recordings and correspondence; online identifiers; device and usage information; photographs, video, and geolocation information; and opinions or assessments relating to an individual.

## 3. Our Privacy Principles

### Accountability

We are responsible for personal information under our control. Our Chief Privacy Officer oversees our privacy program, policies, training, vendor controls, complaint handling, and compliance monitoring. Contact details appear at the end of this policy.

## Identifying Purposes and Limiting Collection

We identify the purposes for collecting personal information before or at the time of collection and collect only information that is reasonably necessary for those purposes. We seek to obtain information fairly, lawfully, and without misleading individuals.

## Consent

We obtain meaningful consent appropriate to the sensitivity of the information, the reasonable expectations of the individual, and the circumstances. Consent may be express or implied where permitted by law. We provide understandable information about what we collect, why we collect it, how it will be used, key disclosures, and reasonably foreseeable consequences or risks.

Individuals may withdraw consent, subject to legal or contractual restrictions and reasonable notice. Withdrawal may affect our ability to provide insurance, adjust a claim, deliver a requested service, or maintain a particular communication preference. We may collect, use, or disclose information without consent where permitted or required by law.

## Limiting Use, Disclosure, and Retention

Personal information will not be used or disclosed for purposes other than those for which it was collected, except with consent or as permitted or required by law. Personal information is retained only as long as necessary to fulfill the identified purposes or as required by law.

We may disclose customer personal information to:

- Another insurance company for the reasonable provision of insurance services. This may include another insurance company that is subscribing to the risk insured under our policy.
- Other insurance companies for reasonable provision of insurance services, including companies subscribing to risks under our policies
- Reinsurance companies, subject to their agreement to manage personal information according to these privacy principles
- Licensed independent insurance claims adjusters, investigators, or forensic experts
- Medical or rehabilitation specialists providing opinions pursuant to our rights and obligations under the Insurance Act
- Companies or individuals performing data processing, accounting, actuarial or statistical functions on our behalf
- Persons or corporations involved in developing, enhancing, marketing or providing our insurance products and services
- Collection agencies for outstanding accounts

- Public authorities or their agents when required to comply with statutes or regulations
- Law enforcement agencies where consent is provided or disclosure is required by law or emergency
- Credit agencies

**Important:** We do not sell or provide customer lists to outside companies for marketing or solicitation purposes. Only employees with a business "need to know" are granted access to personal information.

### Accuracy, Safeguards, Openness, and Access

We take reasonable steps to keep information accurate, complete, and current for its intended use. We use administrative, technical, contractual, and physical safeguards appropriate to the sensitivity, amount, format, distribution, and storage of the information. We make information about our privacy practices readily available and provide access and correction rights as described below.

## 4. Information We Collect and Sources

We may collect information directly from an individual and, where lawful, from brokers, agents, family members, policyholders, insured persons, claimants, witnesses, repair facilities, contractors, adjusters, investigators, health professionals, employers, payment processors, reinsurers, other insurers, industry databases, fraud-prevention organizations, government bodies, courts, law enforcement, consumer reporting agencies, publicly available sources, digital platforms, and service providers.

We may record calls or virtual meetings, with notice where required, for quality assurance, training, transaction confirmation, safety, fraud prevention, and dispute resolution. Information submitted through public social media posts may be visible to others; sensitive information should be sent only through a secure channel we designate.

## 5. Purposes for Collection, Use, and Disclosure

We may handle personal information to:

- identify individuals, verify information, and communicate with them;
- assess risk, eligibility, underwriting, pricing, coverage, renewals, endorsements, cancellations, and policy administration;
- process payments, refunds, premiums, deductibles, recoveries, and collections;

- receive, investigate, assess, adjust, defend, settle, recover, and prevent claims and losses;
- obtain medical, financial, driving, property, credit, or other reports where relevant, lawful, and consented to or otherwise permitted;
- detect, investigate, prevent, and report fraud, misrepresentation, cyber incidents, money laundering, and other unlawful activity;
- arrange reinsurance, loss control, inspections, repairs, appraisals, legal services, roadside or emergency assistance, and other services;
- respond to inquiries, complaints, access requests, litigation, audits, and regulatory or legal requirements;
- improve products, service quality, accessibility, analytics, security, websites, and digital experiences; and
- send service messages and, with any consent required by law, marketing or promotional communications.

## 6. When We Disclose Information

We may disclose personal information to parties that reasonably need it for the purposes described above, including brokers, agents, adjusters, appraisers, investigators, repair facilities, contractors, legal counsel, health professionals, payment processors, technology and communications providers, analytics and document-management providers, reinsurers, other insurers, industry organizations and databases, regulators, ombuds services, law enforcement, courts, government bodies, and prospective parties to a permitted business transaction.

Service providers must use information only for authorized purposes and protect it through appropriate contractual, organizational, and technical measures. We do not sell personal information.

Some service providers may process or store information outside Ontario or Canada. Information in another jurisdiction may be subject to that jurisdiction's laws and accessible to its courts, law enforcement, or authorities. We assess service-provider privacy and security practices and use safeguards appropriate to the circumstances.

## 7. Automated Processing and Analytics

We may use models, rules, analytics, or automated tools to support fraud detection, underwriting, risk assessment, pricing, claims triage, service delivery, and security. We apply governance and human oversight appropriate to the significance and sensitivity of

the decision. Individuals may contact us for available information about a decision materially affecting them and to request review, subject to legal and proprietary limitations.

# 8. Communications, Social Media, and Text Messaging

## Service and Marketing Communications

We may contact individuals through the channel they provide or select. Service communications may concern applications, policies, billing, renewals, claims, security, emergencies, or legal notices. Commercial electronic messages are sent in accordance with applicable anti-spam law. Individuals may unsubscribe from marketing messages using the method provided, but may continue to receive necessary service or transactional messages.

## Social Media and Public Platforms

Our social media pages, feeds, advertisements, comments, direct messages, and platform interactions may be operated with third-party platforms. Those platforms have their own privacy practices. We may collect information an individual chooses to provide, as well as engagement and campaign information made available to us by the platform. We do not request sensitive policy, payment, health, or claim information through public posts. We may move a conversation to a secure channel to protect privacy.

## Text Messaging (SMS/MMS)

Where an individual enrolls in text messaging, we may send messages for the purposes described at enrollment, such as claim updates, payment or renewal reminders, authentication codes, appointment notices, service alerts, or marketing communications. Message frequency varies. Message and data rates may apply. Consent to receive marketing texts is not a condition of purchasing insurance unless expressly permitted by law.

Individuals may opt out by replying **STOP** or using another stated method. They may reply **HELP** or contact us for assistance. Opting out of texts does not change other communication preferences unless requested. Consent records may include the telephone number, date, time, source, disclosure shown, and opt-in or opt-out action.

Text messaging opt-in data and consent will not be shared with third parties for their own marketing or promotional purposes. It may be disclosed only to aggregators, telecommunications carriers, messaging platforms, and other service providers that

process messages or support the program on our behalf, or where required or permitted by law.

Text messages may not be fully secure and may be visible to anyone with access to the receiving device or account. Individuals should not send highly sensitive information by text unless we specifically provide a secure method.

### Cookies and Similar Technologies

Our websites, portals, emails, and digital advertising may use cookies, pixels, software development kits, logs, and similar technologies for essential functions, preferences, authentication, security, measurement, analytics, and—where permitted—advertising.

## 9. Safeguards and Privacy Incidents

Our safeguards may include role-based access, authentication, encryption where appropriate, secure configuration, logging and monitoring, physical controls, privacy and security training, vendor due diligence, confidentiality obligations, secure disposal, incident-response procedures, and continuity planning. No system is completely secure, but we regularly review safeguards and adjust them to evolving risks.

We assess suspected losses of, unauthorized access to, or unauthorized disclosures of personal information. Where a breach creates a real risk of significant harm, we notify affected individuals and report to the Office of the Privacy Commissioner of Canada as required. We also notify other organizations or government institutions where doing so may reduce or mitigate harm and keep required breach records.

## 10. Access and Correction

On written request and satisfactory identity verification, an individual may ask whether we hold personal information about them and request access to it, an account of its use, and information about disclosures. Individuals may request correction of inaccurate or incomplete information.

Access may be limited where permitted or required by law, including to protect another person’s information, legal privilege, confidential commercial information, security, investigations, or statutory restrictions. If access or correction is refused, we will explain the reason and available recourse, unless prohibited by law. We respond within legally required timelines and may charge only a permitted fee after advance notice.

## 11. Children and Other Authorized Persons

Our products are generally arranged by adults. Where information about a minor or another person represented by an authorized individual is necessary, we obtain consent from a parent, guardian, substitute decision-maker, attorney, or other lawful representative as appropriate, while considering the individual's capacity and the sensitivity of the information.

## 12. Questions, Requests, and Complaints

Questions, consent withdrawals, communication-preference requests, access or correction requests, and privacy complaints should be directed to:

**Chief Privacy Officer**
Edge Mutual Insurance Company
PO Box 190, 103 Wellington Street South
Drayton ON  N0G 1P0

Email: info@edgemutual.com
Telephone: 1-844-638-3305

We investigate complaints fairly and communicate the outcome. If an individual is not satisfied, they may contact the Office of the Privacy Commissioner of Canada. Depending on the matter, insurance complaint-resolution or regulatory channels may also be available.

## 13. Changes to This Policy

We may update this policy to reflect changes in law, regulatory guidance, technology, products, services, or practices. The current version will be posted through our designated channels with the effective date. Where required, we will provide additional notice or obtain renewed consent for a material change.