



PRIVACY CODE

INTRODUCTION – WE RESPECT YOUR PRIVACY

Primerica is dedicated to providing proven solutions for your financial future. We are committed to bringing you excellent financial products, superior service and ongoing information about new products and services that may be useful to you. We are also committed to protecting the personal information that you provide to us.

As a provider of financial products and services best suited to you, the collection and use of personal information is fundamental to our business. It is therefore important to us that you have full trust in our handling of your personal information.

In order to provide you with Primerica products and services, the Primerica Representatives you have business dealings with will be required to obtain your personal information as well as your consent for its use. Typically, your consent is obtained by the Primerica Representatives at the time of your application or account opening, either by means of verbal consent, or in some form of disclosure document. To enable Primerica to provide you with the products and services we offer, Primerica Representatives provide us with access to your personal information. In addition, as part of the services we provide to you, we routinely collect and process your personal information in connection with your business dealings with Primerica Representatives and us. There may also be occasions when we collect personal information about you directly from other advisors or dealers, credit bureaus or other financial institutions.

The collection of personal information must meet our privacy standards. We maintain physical, electronic, and procedural safeguards that meet applicable law. We train our employees in the proper handling of personal information. When we use other companies to provide services for us we require them to protect the confidentiality of the personal information we share with them to the degree and standards we have set for ourselves.

This Privacy Code is provided to you for your interest and information. If you would like more information regarding our privacy principles, please read on. If you have privacy questions or concerns, please contact our Privacy Office at:

PRIVACY OFFICE
Primerica Canada
6985 Financial Drive, Suite 400
Mississauga, Ontario, L5N 0G3
Tel: 1-800-387-7876
Email: PrivacyOfficeCanada@primerica.com

You may also contact our Privacy Office if you wish to verify that the personal information we have about you is correct or if you would like to be taken off any mailing lists we might share with affiliated companies. To remove your name from these lists or to examine certain information we have in our files about you, send your name and policy or account number to the attention of our Privacy Office at the address listed above.

About the Primerica Privacy Code

Primerica is committed to maintaining your trust and confidence when handling your personal information. The Primerica Privacy Code is an embodiment of this commitment. As a client of Primerica, you have the opportunity to make choices about how personal information about you may be shared. As you consider this, we encourage you to make choices that will best enable us to provide you with quality products and services that help you meet your financial needs and objectives.

This Privacy Code describes the principles that will guide Primerica in protecting the privacy of your personal information in its possession or control.

Changes to This Privacy Code

In order to maintain a current and up to date Privacy Code, we reserve the right to make changes from time to time. Notice of changes to the Privacy Code may be distributed through Primerica statements, newsletters and/or posted on the Privacy Link of the Primerica Canada web site. If you access or choose to continue to be serviced by Primerica after the effective date of the change, you are automatically deemed to have accepted the change. However, any material changes to the Privacy Code shall require explicit consent and not come into effect until then.

Definition of Terms Used In This Privacy Code

Personal Information - Information about an identifiable individual. However, personal information does not include business contact information (such as the name, title, business address, business telephone number, or business electronic address of an employee of an organization) to the extent collected, used or disclosed solely for communicating with that individual in their business capacity.

Primerica - References to "Primerica" or depending on the context, "we", "our" or "us" will collectively include the following: Primerica Financial Services Ltd., Primerica Financial Services (Canada) Ltd., Primerica Life Insurance Company of Canada, PFSL Investments Canada Ltd., PFSL Fund Management Ltd. and Primerica Client Services Inc.

Primerica Representative(s) – an independent contractor sales representative, who has signed an independent business application and,

- (1) is registered as a Dealing Representative (Mutual Fund Dealer) to sell mutual funds for PFSL Investments Canada Ltd.,
- (2) is licensed as a life insurance agent to sell life insurance products of Primerica Life Insurance Company of Canada,
- (3) is both registered as a Dealing Representative and holds a life insurance license, or
- (4) has signed an independent business application without holding a life license or being registered as a mutual fund Dealing Representative.

Privacy Officer/Privacy Office - The individual and department at Primerica responsible for ensuring the protection of individuals' personal information. The Privacy Office may be contacted by mail or telephone at:

PRIVACY OFFICE
Primerica Canada
6985 Financial Drive Suite 400
Mississauga, Ontario, L5N 0G3
Tel: 1-800-387-7876
Email: PrivacyOfficeCanada@primerica.com

You/Your - Individual client of Primerica.

PRIMERICA'S TEN PRINCIPLES OF PRIVACY

1. **Accountability** – Primerica is accountable for personal information in our possession or under our control. We have designated one or more individuals to be responsible for monitoring our ongoing compliance with the Primerica Privacy Code.

2. **Identifying the Purposes for Collection** - Primerica Representatives will inform individuals of the purpose for which personal information is collected or used before or when it is collected.

3. **Consent** - Primerica will obtain consent before or when it collects, uses or discloses personal information about an individual, subject to certain exceptions such as legal or security reasons that make it impossible or impractical to seek consent. Your consent may be expressed in writing, given verbally, electronically, or through a Primerica Representative. In certain circumstances, it may also be implied. Your consent can be withdrawn by you at any time, with certain exceptions.

4. **Limiting collection** - Primerica will collect personal information only for the identified purposes or as otherwise permitted by law. Primerica will only collect your personal information by fair and lawful means.

5. **Limiting use, disclosure and retention** - Primerica will use or disclose personal information only for the reasons for which it was collected, unless an individual gives consent to use or disclose it for another reason or as otherwise permitted by law. Primerica will only keep personal information for as long as is necessary for the purposes for which it was collected, or as otherwise required or permitted by law.

6. **Accuracy of Personal Information** – Primerica will maintain any personal information it collects, uses or discloses as accurate, complete and as up-to-date as is necessary for the purpose for which it is to be used. Any individual may challenge the accuracy and completeness of the personal information about them and have it amended as appropriate.

7. **Safeguards** – Primerica will endeavor to protect personal information from unwarranted intrusion, release or misuse using security safeguards that are appropriate to the sensitivity of the information.

8. **Availability of Information about Policies and Procedures** – Information about our policies and procedures used to manage personal information will be made available in easy to understand language. The information is available from the Privacy Office.

9. **Individual Access to Personal Information** – Upon written request to the Privacy Office, Primerica will advise the individual as to the personal information that Primerica has in its possession, the purpose for which it has been used and to whom it has been disclosed. Primerica will also give the individual an opportunity to access their personal information as permitted by law. The individual may also request that the personal information be amended as appropriate should the personal information be inaccurate or incomplete.

10. **Challenging Compliance, Inquiries and Concerns** – Individuals may contact the Primerica Privacy Office with any inquiries or concerns regarding the Primerica policies and procedures or to challenge Primerica’s adherence to them.

IMPORTANT INFORMATION ABOUT PRIMERICA’S PRIVACY PRACTICES

Where does the Personal Information that Primerica Collects come from?

The nature of the personal information that Primerica collects and holds about you may be collected from:

- i) Information we collect, hold and receive from you or your Primerica Representative on applications for financial products and services, insurance, insurance claim forms and other forms such as name, gender, date of birth, address, telephone number, email address, occupation, employer, particulars of employment, assets, income, language preference and other personal identification information (such as government-issued identification, social insurance number, driver’s license number, passport number and/or, where permitted, provincial health insurance card number);
- ii) Information we collect, hold and receive from you or your Primerica Representative on a volunteer basis when we are conducting a survey of your preferences, needs or interests;
- iii) Information we receive from you or your Primerica Representative on a volunteer basis when conducting a Financial Needs Analysis;
- iv) Information about your transactions with us, your Primerica Representative, or third parties, such as account numbers, account balances, the Primerica office servicing the financial products and services and any insurance you have obtained from Primerica, payment history, and account activity;
- v) Information we collect, hold and receive from your employer(s);
- vi) Reports we receive from credit bureaus;
- vii) Information we collect, hold and receive from program partners and service providers with or for whom we provide financial and/or insurance products and services to you;
- viii) Information we collect, hold and receive from you or third parties (including hospitals, clinics and other medical facilities, physicians and other health care providers) about your health, including particulars of medical conditions, diagnosis and treatment; physician’s contact information and records of visits;
- ix) Information relevant to your credit, insurance, and any other financial products or services you request from time to time; and
- x) Information from your employer, physician and lending institution as required to process your application or claim.

Other Sources of Personal Information

From time to time, we also collect and hold additional personal information about you regarding the current status of your accounts and/or insurance communicated by Primerica Representatives and generally for administering the financial products and services and any insurance we provide to you. Where a Primerica Representative provides us with your Social Insurance Number and indicates that you have consented, we may use your Social Insurance Number for identification purposes, namely to determine an accurate match of your application with our existing records. For purposes of evaluating, assessing, investigating and processing any insurance claims you submit, we may also collect additional information about you from the following sources:

- i) Physicians and other medical and health care practitioners and providers;
- ii) Hospitals, clinics and other medical facilities;
- iii) Provincial and territorial Worker’s Compensation Boards;

- iv) Department of Human Resources and Skills Development Canada (formerly Human Resources and Social Development Canada);
- v) Primerica Representatives, mandataries, insurance brokers, intermediaries and financial services representatives with whom you have a relationship;
- vi) Employers;
- vii) Adjusters, investigators, inspectors, and police; and
- viii) Our affiliates, including Primerica Life Insurance Company of Canada and PFSL Investments Canada Ltd. and Primerica Financial Services (Canada) Ltd.

Except as noted above in the case of medical information, we are not collecting any sensitive information from our affiliates or third parties, such as detailed information regarding specific purchases of goods or services, or information concerning customer preferences, needs or interests where a reasonable person would expect the subject matter to cause offence or embarrassment.

We have established policies and procedures pertaining to the retention and destruction of the personal information that we hold about you.

Why Do We Collect Personal Information

We may use the personal information we collect about you for the following purposes:

- i) To establish your identity;
- ii) In the case of a Social Insurance Number, for administration, record keeping, file identification and, if applicable, tax reporting purposes;
- iii) To determine your eligibility and process your applications for insurance or other financial products and services we offer;
- iv) To evaluate, assess, and investigate your application, our insurance risks, and any claims you submit to us;
- v) To administer and service the financial products and services, and insurance products, we provide to you;
- vi) To respond to your inquiries about applications, insurance products and other financial products and services;
- vii) To meet legal, security, processing and regulatory requirements, including Canadian federal and provincial requirements and foreign requirements applicable to us or any of our affiliates or service providers;
- viii) To understand your needs and to offer products and services to meet those needs;
- ix) To allow our affiliates and selected companies to promote their products and services to you; and
- x) Such other purposes as we disclose herein or that we identify to you from time to time or as permitted by law.

You may refuse or withdraw your consent to (ix) above, as explained here. We may also use or disclose personal information for other purposes with your consent, or as otherwise permitted or required by law (see *Consent* section, below).

Why We Share Your Personal Information

- A. Disclosures** - Your personal information may be disclosed to third parties for the purposes of servicing your account, business transactions or meeting applicable legislative or regulatory requirements in Canada or in other foreign jurisdictions – as well as any other purposes for which you provide your consent or as permitted by law. These third parties include: (i) your legal representative; (ii) other financial institutions or mutual fund

companies; (iii) credit bureaus; (iv) Canadian or foreign governments, government agencies and regulators; and (v) any other legally required institutions.

B. Transfers to Service Providers - In common with many organizations, we keep our costs down by obtaining some routine services from service providers, and your personal information may be provided to them. These service providers must sign a confidentiality agreement and may only use the information disclosed to them for the specific purposes mentioned in the agreement, after which they must return this information to Primerica or destroy it, without keeping a copy. We may transfer Personal Information to service providers for:

- i) Statement preparation, printing and other administrative services
- ii) Data processing and market research services
- iii) Insurance underwriting and related functions or services such as the Medical Insurance Bureau;
- iv) Legal, regulatory and compliance purposes;
- vi) Participating in payment clearing and settlement systems in association with other financial institutions;
- vii) Distributing information and/or promotional offers to you related to the products and services you have with us;
- viii) Managing your insurance benefits and claims administrations services;
- ix) Bill payment services;
- x) Debt collection activities in connection with amounts you owe to us;
- xi) To help prevent fraud, money laundering or other criminal activity.

Some of our service providers (including our affiliates acting in that capacity) that process or handle personal information on our behalf are located outside of Canada. As a result, your personal information may be transferred, stored and/or processed outside of Canada in connection with the purposes described herein. The contractual or other measures we may use to protect your personal information are subject to the legal requirements of the foreign jurisdictions where your personal information may be transferred, stored or processed (for example, a legal requirement to disclose personal information to government authorities in those foreign jurisdictions). If you have questions regarding countries where your personal information may be processed/handled or for information about our foreign processing policies, please contact the PrivacyOfficeCanada@Primerica.com.

Who Might We Share Your Information With

A. **Affiliates** - Our affiliates are the family of companies that form Primerica. A complete list of our affiliates is available from the Privacy Officer at the address or telephone number indicated in the *Requests and Challenges to Our Privacy Policies and Procedures* section herein.

Primerica and its affiliates may share with each other “marketing lists” - lists of customers who meet certain general, non-sensitive criteria. This information may include your name, address, category of income, gender, preferred language of communication, preferences, needs or interests. The sharing of such information is done in order to assist our affiliates to offer products and services that may be of interest to you. We are not sharing specific financial information or medical or other sensitive information with our affiliates, except when our affiliates are acting for us as service providers, when we are authorized by law or if we have your consent. If you prefer that we not share our marketing lists containing

your name and information about you with our affiliates, you may contact us at the appropriate address or telephone number mentioned in the *Requests and Challenges to Our Privacy Policies and Procedures* section below, allowing for a reasonable time for the withdrawal of your name and that information.

- B. Third Parties - From time to time, we may disclose personal information, through marketing lists, to selected companies or organizations to allow them to offer you directly goods and services that may be of interest to you. These marketing lists contain very general and non-sensitive information such as names, addresses and telephone numbers, and categories of goods and services reflecting your preferences and interests. In no case will sensitive information about you, including specific financial data or credit ratings, be disclosed without your express positive consent. These selected companies and organizations will also be formally prohibited from disclosing the information to third parties or using it for another purpose without obtaining appropriate consent in advance.

If you prefer to be removed from the marketing lists we may share with third parties, you are free to opt-out at any time by contacting us at the appropriate address or telephone number mentioned in the *Requests and Challenges To Our Privacy Policies and Procedures* section below. Please allow a reasonable time for your withdrawal request to become effective.

Primerica may also enter into contracts with third parties from time to time and share your personal information for the purposes of marketing, research, studies and surveys. Primerica maintains contracts with such third parties to prohibit them from using any of your personal information outside of the contracted purposes, and the third parties are contractually obligated to maintain the confidentiality of the information we have provided to them.

Your Consent

Depending on the nature and sensitivity of your personal information, your consent to the collection, use or disclosure of such information can be express/opt-in (express/opt-in consent may be oral, in writing or electronic) or implied (such as by using or maintaining one of our products or services or by not responding to our offer to remove your personal information from our marketing list, in which case we assume that you consent). Your authorized representative may give consent. You may withdraw your consent at any time as long as you give reasonable notice of withdrawal. To withdraw your consent, please contact us at the address or telephone number mentioned in the *Requests and Challenges to Our Privacy Policies and Procedures* section below. Withdrawal or refusal of consent is subject to legal and contractual restrictions. Please note that if you withdraw your consent, we may not be able to provide some products or services to you.

Please note that we may be permitted to collect, use or disclose your personal information without your consent for legal, security, or certain processing reasons when authorized by law. For example, your consent is not required when collecting or exchanging your personal information to deter fraud, money laundering or other criminal activity, or to collect a debt.

Please remember that your telephone conversations with our representatives may be monitored and/or recorded for quality control, internal training and record keeping purposes.

How to Access or Correct Your Personal Information

You have the right to access, obtain copies of your file and request rectification of any personal information in the file that may be obsolete, incomplete or incorrect.

We want to make this as simple as possible for you. You can contact us any time during normal business hours at our address or telephone number mentioned in the *Requests and Challenges to Our Privacy Policies and Procedures* section below. We will need to validate the identity of anyone making such a request to confirm that we do not provide your personal information to anyone who does not have the right to that information.

We may charge you an administration fee for providing access to your file in accordance with your request. Normally, we will respond to access or rectification requests within 30 days.

Please note that, in certain circumstances, we may not be able to provide you with access to specific portions of file information about you. For example, we will not provide you with access to the following information:

- i) Information containing references to other persons;
- ii) Information containing our confidential or proprietary information; or
- iii) Information that has been destroyed.

It is your responsibility to inform us of any changes that could affect the status of your accounts or services with us.

How We Retain and Protect Your Information

We will establish and maintain a file of personal information for each applicant and customer. Personal information in our possession may be kept in electronic or paper format in our Canadian or United States offices or data centres, or in third party provider facilities.

We have policies, procedures, guidelines, and safeguards in place at Primerica to secure your personal information. Security measures such as passwords, restricted access to our offices and records, physical access security, and file encryption have been put in place to protect your personal information against unauthorized access, theft or misuse.

We restrict access to your file to personnel who need to access your file in the course of their duties. Each Primerica employee is responsible for maintaining the confidentiality of all personal information accessed. As a condition of employment, every employee must sign a code of conduct, which includes comprehensive provisions that addresses the protection of your personal information.

Any personal information collected from you will be used for the purposes identified at the time of collection and will be retained for as long as is necessary to fulfill those purposes, or as required by law.

How to Contact Us About Privacy Questions, Requests, or Concerns

To ask any questions about this code or our privacy practices, to file a privacy complaint or an opt-out request, to request access to your personal information or to report incorrect personal information, please contact us at:

PRIVACY OFFICE
Primerica Canada
6985 Financial Drive, Suite 400
Mississauga, Ontario, L5N 0G3
Tel: 1-800-387-7876
Email: PrivacyOfficeCanada@primerica.com

We will generally respond to you within 30 days. We will investigate all complaints and if we find a complaint to be justified, we will take all appropriate measures, including, if necessary, amending our policies and practices.