

CAA CLUB GROUP ADVISORY SERVICES PRIVACY POLICY

LAST UPDATED: December 2025

CAA Club Group Advisory Services (“CCG Advisory”) is committed to the protection of your personal information.

This Privacy Policy explains the privacy practices in connection with CCG Advisory’s activities, both online and offline, mobile apps, as well as in person or telephone interactions.

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1. Accountability for Your Privacy

CCG Advisory takes full responsibility for the management and confidentiality of personal information we collect and use. Personal information is collected, used, shared and stored in accordance with the *Personal Information Protection and Electronic Documents Act*, S.C. 2000, c.5 and any applicable provincial privacy laws that may apply to CCG Advisory from time to time.

2. Personal Information and How We Collect It

Personal information includes your name, contact information, birth date, gender, email address, vehicle information, payment information, questions related to lifestyle, health, family history, prior and current insurance held, information about your income, assets, liabilities, personal finances, and any identifiers such as your CAA membership number, For CCG Advisory’s applicants, personal information includes previous insurance claims experience.

Direct and Indirect Collection

We generally collect personal information directly from you, for example, from application forms that you fill out for our insurance products and services, or when you communicate with us by

telephone, email or in person. We may also collect personal information about you from other sources, such as other insurance brokers, insurance companies, consumer reporting agencies, industry associations, data banks, investment product suppliers, marketing agencies, government agencies, claims adjusters, employers and inspectors.

There are also ways in which CCG Advisory collects personal information indirectly. For example, information may be sought from the Medical Insurance Bureau (“MIB”) about whether you were denied insurance coverage or had coverage terminated.

3. Using Your Personal Information

CCG Advisory generally uses personal information to manage and administer our business, including to understand your insurance needs, communicate with you effectively and to provide you with the products and services you request. For example, we use personal information for the following purposes:

- To confirm your eligibility for CCG Advisory products and services
- To process, administer and manage your life, living benefits and health insurance applications, including to communicate your application to our insurance carriers for assessment
- To verify your identity and to communicate with you, including responding to your inquiries and confirming receipt of a requested product or service
- To determine potential fees and premiums
- To inform you about products and services that we offer which we believe may be of interest to you
- To conduct surveys or research for CCG Advisory’s internal use in order to better understand our insureds and improve our product and service offerings, as well as to compile aggregate statistics for internal reporting purposes
- To detect, prevent and suppress fraud, unauthorized, or illegal activities
- To meet auditing, legal and regulatory processes and requirements.

If you obtain insurance for a family member or another person, or provide personal information concerning another person, including a family member, for example by naming him/her as a beneficiary, you represent that you have obtained any necessary consent to our collection, use and disclosure of his/her personal information for the purposes described above.

4. Withdrawing your Consent

Your consent to our use of your personal information can be withdrawn at any time, subject to legal or contractual restrictions, by providing us with written notice to the contact information found at the end of this policy. Upon receipt of notice to withdraw consent, we will inform you of the consequences of withdrawing your consent before we process your request, which may include CCG Advisory’s inability to provide you with certain products or services.

If you wish to opt out of receiving marketing or promotional communications from us or change your communications preferences, please contact the Privacy Officer (see Section 11).

If you have received an email from CCG Advisory, you may also click the “unsubscribe” link at the bottom of each of our emails. **Please note that if you unsubscribe from receiving marketing communications, you may still continue to receive transactional or informational messages from us.**

5. Sharing Your Personal Information

CCG Advisory takes all reasonable steps to protect the interest of individuals when disclosing personal information. We do not disclose personal information for purposes other than those purposes for which it was collected (as described in Section 3 above), unless you have provided consent to do so or we are required/permitted by law to disclose the information.

Service Providers

We may share your personal information with service providers and suppliers of goods and services. For example, we may use third party service providers to authorize and process payments, conduct customer research or analyze data. Our service providers are only given the information they need to perform their designated functions.

We take reasonable steps to ensure that any third parties who we entrust with your personal information are reputable and have safeguards in place to protect this information. In working with business partners, service providers and suppliers, your personal information may be transferred to a foreign jurisdiction to be processed or stored. Such information may be provided to law enforcement or national security authorities of that jurisdiction upon request, in order to comply with foreign laws.

Affiliated Companies

Personal information may be disclosed to our affiliates for internal audit, management, billing or administrative purposes. We may also disclose personal information to our affiliates so that they may send you information about their products and services. However, if you do not want your personal information disclosed for these marketing purposes, you may contact us at any time to withdraw your consent. For instance, CCG Advisory agents may see whether you have an active CAA membership, have used CAA roadside services or have conducted business with our affiliated insurance companies. This information sharing allows us to assess your needs and to inform you about insurance products and services which we believe may be of interest to you.

Business Partners

CCG Advisory may disclose your personal information to third parties, such as other insurance agencies, insurance carriers, consumer reporting agencies, claims adjusters, government, regulatory and self-regulatory agencies, financial institutions, benefits providers and medical

professionals, and others involved in the claims handling process, for the purposes described in Section 3 above. For instance, when CCG prepares an application for insurance products, it will be shared with insurance companies (carriers) who will assess your personal situation and offer you a policy. We will not share your CAA Membership information with any external business partners.

Third Party Advertising

CCG Advisory may also share your name, phone number and e-mail address with third party advertisers such as social media platforms for targeted advertising purposes. Services such as Facebook Custom Audiences and Google Ads Custom Match allow CCG Advisory to reach potential customers who would benefit from our products and services. Information provided to such third parties is secured at all times and only used for the purpose of displaying ads and reporting back to CCG Advisory on the performance of such ads. You can choose to hide ads through your social accounts at any time, or you can contact CCG Advisory to opt out of sharing your information with social media platforms altogether, by sending an email to privacy@caasco.ca with 'opt-out' in the subject line along with your CCG Advisory policy number if applicable.

CCG Advisory also uses third party advertising partners to provide on-line visitors with relevant ads across the Internet. You may also opt out of interest based advertising by visiting the opt-out tool made available by the Digital Advertising Alliance of Canada at <https://youradchoices.ca/choices/>.

6. Keeping Your Information Safe

CCG Advisory has implemented physical, organizational and technical measures to guard against unauthorized or unlawful access to the personal information we manage and store. We have also taken steps to avoid accidental loss or destruction of, or damage to, your personal information. While no system is completely secure, the measures implemented by CCG Advisory significantly reduce the likelihood of a data security breach.

In addition, we recommend that you do your part in protecting yourself from unauthorized access to your personal information. CCG Advisory is not liable for any unauthorized access to your personal information that is beyond our reasonable control.

Let us know right away if your contact information changes or you find any errors in your account statements or invoices.

7. Accessing Your Personal Information

We make every effort to ensure that the personal information we hold is accurate, complete and up-to-date for the purposes for which we collect it. You can make a written request for access to

your personal information at any time. You will need to provide as much information as necessary to help us process your request and locate the information you require.

If you need assistance in preparing your request, please contact us and we would be pleased to help you. Upon receipt of your request, CCG Advisory will update your information, or inform you of how your personal information has been or is being used, and who your personal information has been shared with. We may charge a fee to cover any reasonable expenses related to responding to your access request.

CCG Advisory responds to access requests within 30 days, unless an extension of time is required. However, there may be contexts where access is refused or only partial information is provided, for example, in the context of an on-going investigation or where another individual's personal information or identity must be protected.

8. How Long We Keep Your Information

CCG Advisory retains personal information for as long as necessary to fulfill legal or business purposes and in accordance with our retention schedules. Once your information is no longer required by CCG Advisory to meet business, legal or regulatory requirements, it is securely destroyed, erased or made anonymous. Keep in mind however that information may be retained for a lengthier period of time due to an on-going investigation or legal proceeding, and that residual information may remain in back-ups for a period of time after its destruction date.

9. Our Privacy Complaint and Breach Management Process

CCG Advisory takes privacy complaints very seriously and has a procedure in place for escalating and managing any privacy-related concerns to ensure that they are responded to in a timely and effective manner. Any suspected privacy breach must be escalated internally to CCG Advisory's Privacy Officer who oversees the containment, investigation and corrective actions for all breach situations.

As required by law, privacy breaches may be reported by CCG Advisory or its business partners to the regulators of the relevant provinces in which affected individuals reside.

10. Changes to this Policy

We may change this Privacy Policy from time to time in order to better reflect our current personal information handling practices. Thus, we encourage you to review this document frequently. The "Last Updated" date at the top of this Privacy Policy indicates when changes to this policy were published and are thus in force. Your continued use of CCG Advisory products and services following the posting of any changes to this Privacy Policy means you accept such changes.

11. Getting in Touch

Any inquires, concerns or complaints regarding privacy at CCG Advisory should be directed to:

CAA Club Group Advisory Services Privacy Office

PO Box 8075 STN Industrial Park

Markham, Ontario L3R 0K4

E-mail: privacy@caasco.ca

Phone: 1-800-268-3750 Ext. 25043

Your concerns will receive prompt attention. Our Privacy Office can also provide you with more detailed information about CCG Advisory's policies and practices or assist you with completing an access to information request. Please include your name, address, telephone number and email address whenever you contact us, including by email. Please note that we can only disclose information to the policyholder or a previously authorized individual. Keep in mind however that e-mail or text messaging are not secure forms of communication, so never send confidential personal information to us this way.

Thank you for continued trust in CAA Club Group Advisory Services.

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