

LOCKTON BROKERS, ULC PRIVACY NOTICE

Last updated: 23/06/2026

What is the purpose of this document?

Lockton Brokers, ULC ("Lockton" or "we") is committed to protecting the privacy and security of **your personal information**.

This notice describes how **we**, as an **intermediary**, collect and use **personal information** about **you** during and after **your** engagement with **us**, in accordance with the Data Protection Laws. In particular this notice is designed to help **you** understand how **we** process **your personal information** through the **insurance lifecycle**. **Insurance** is the pooling and sharing of risk in order to provide protection against a possible eventuality. In order to do this, information, including **your personal information**, needs to be shared between different **insurance market participants**.

This notice also aims to give **you** information on how Lockton collects and **processes your personal information** through **your** use of this website, including any data **you** may provide through this website, for example when **you** sign up to our newsletter or fill in our contact us form. In particular, this notice, together with the [Terms of Use](#) and [Cookies Notice](#) sets out how **we** look after **your personal information** when **you** visit **our** website and tells **you** about **your** privacy rights.

Lockton is committed to protecting the privacy needs of children and encourages parents and guardians to take an active role in their children's online activities and interests. Lockton **does not** intentionally collect information from children, and Lockton **does not** target its website to children.

It is important that **you** read this notice, together with any other privacy notice **we** may provide on specific occasions when **we** are collecting or **processing personal information** about **you**, so that **you** are aware of how and why **we** are using such information. This privacy notice supplements the other notices and is not intended to override them.

Controller

Lockton is a "**data controller**". This means that **we** are responsible for deciding what personal information **we** collect, and how **we** hold and use **personal information** about **you**. **We** are required under the Data Protection Laws to notify **you** of the information contained in this privacy notice.

Our Data Protection Manager

We have appointed a **Data Protection Manager** to oversee compliance with and questions in relation to this privacy notice.

If **you** have any questions about this privacy notice, including any requests to exercise **your** legal rights, please contact **our Data Protection Manager** using the details set out below:

CONTACT DETAILS

Data Protection
Manager
Lockton
Companies LLP
The St Botolph
Building 138
Houndsditch
London EC3A
7AG

Email: dataprotection@uk.lockton.com

Changes to this privacy notice and your duty to inform us of changes.

This notice may be updated from time to time. We encourage you to review this notice regularly when you visit our website to learn more about how we are using your **personal information** and safeguarding your privacy. This version is dated June 4 2025 and historic versions can be obtained by contacting **our Data Protection Manager**.

It is important that the **personal information you provide to us** is accurate and current. Please keep **us** informed if **your personal information** changes during **your** relationship with **us**.

Third Party Links

Our website may, from time to time, contain links to and from third-party websites, plug-ins and applications, including, without limitation, websites of **our** partner networks and affiliates. Clicking on those links may allow third parties to collect or share data about **you**. Please note that these third-party websites have their own privacy notices, and we do not control those websites or accept any responsibility or liability for those privacy notices. When **you** leave our website, **we** encourage **you** to read the privacy notice of every website **you** visit. This notice is specific to **our** website.

Defined Terms

In this notice:

we, us or our refers to Lockton Brokers, ULC, a unlimited liability corporation with company number BC1291643 and its registered office at 20th Floor 250 Howe Street, Vancouver. BC V6C 3R8.,

you or your, refers to the individual whose **personal information** may be processed by **us** and other **insurance market participants** (**you** may be a potential or actual policyholder, **insured**, **beneficiary** under a policy, their family member, **claimant** or other person involved in a claim or relevant to a policy).

There are other terms in **bold** with specific meanings. Those meanings can be found in **Section 11: Glossary of Key Terms**.

Contents of this privacy notice

This notice is provided in a layered format so you can click through to the specific areas set out below:

[1 – INTRODUCTION – HOW THE INSURANCE MARKET WORKS](#)

[2 – THE DATA WE MAY COLLECT ABOUT YOU \(YOUR PERSONAL INFORMATION\)](#)

[3 – WHERE WE MIGHT COLLECT YOUR PERSONAL INFORMATION FROM](#)

[4 – THE PURPOSES OF OUR PROCESSING OF YOUR PERSONAL INFORMATION](#)

[5 – CONSENT](#)

[6 – PROFILING AND AUTOMATED DECISION MAKING](#)

[7 – DATA SECURITY](#)

[8 – RETENTION OF YOUR PERSONAL INFORMATION](#)

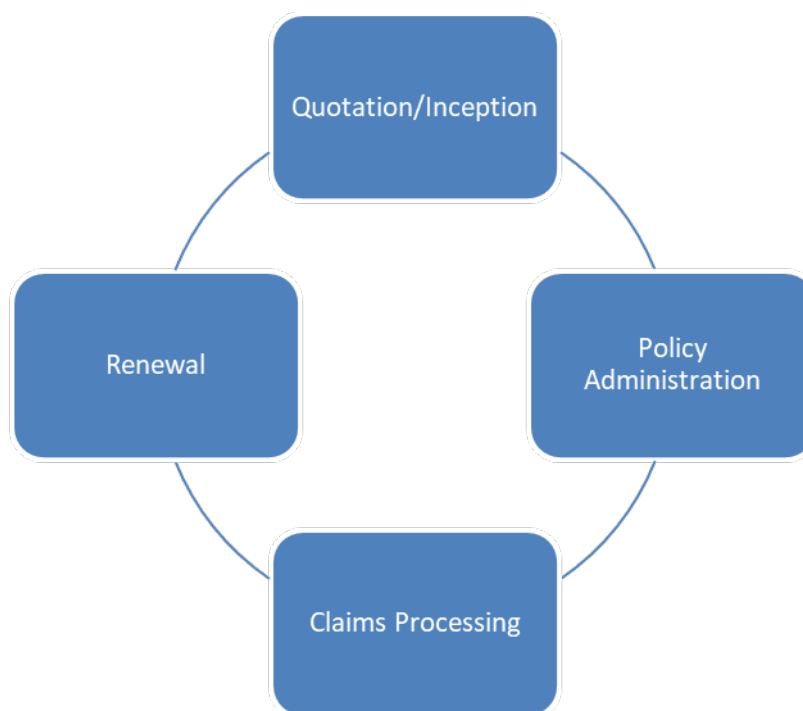
[9 – INTERNATIONAL TRANSFERS](#)

[10 – YOUR RIGHTS AND CONTACT DETAILS OF THE ICO](#)

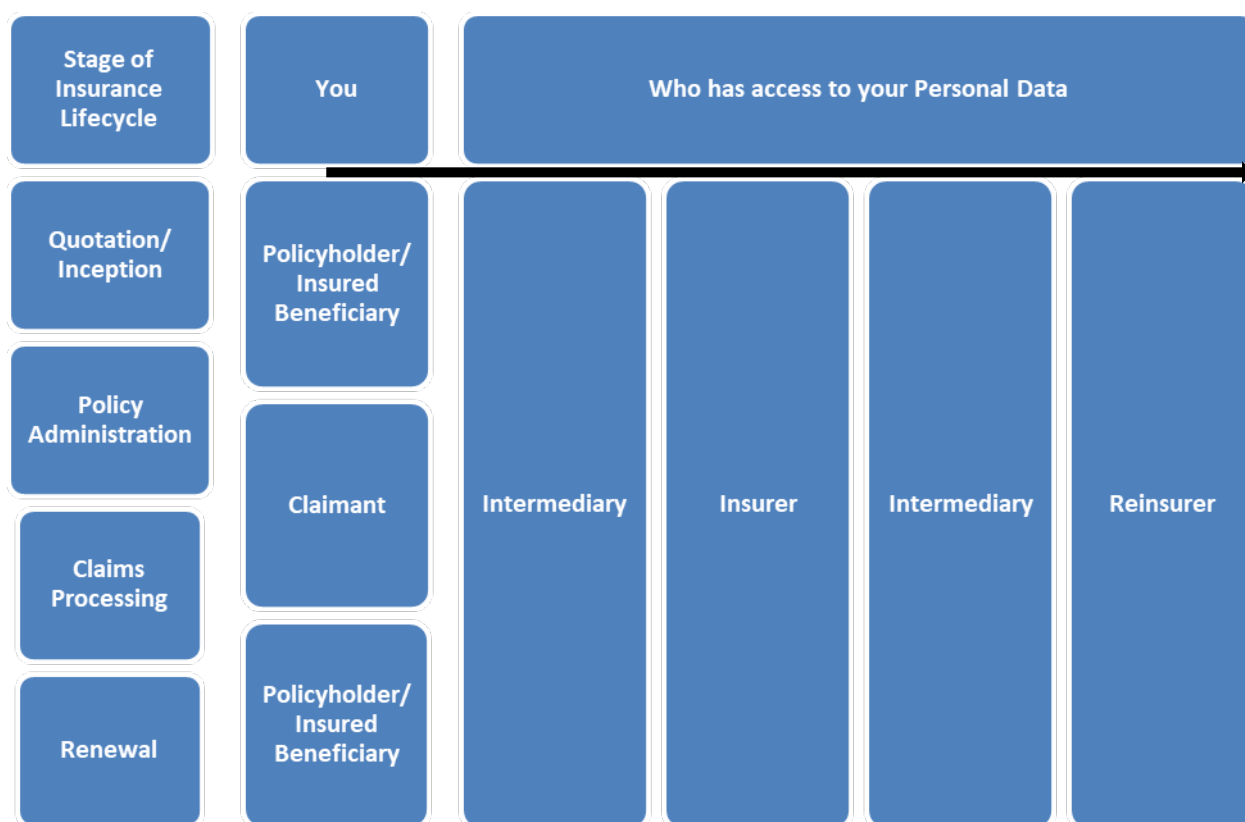
[11 – GLOSSARY OF KEY TERMS](#)

SECTION 1: INTRODUCTION – HOW THE INSURANCE MARKET WORKS

INSURANCE LIFECYCLE:



FLows of Personal Information through the Insurance Lifecycle:



SECTION 2: THE INFORMATION WE MAY COLLECT ABOUT YOU (YOUR PERSONAL INFORMATION)

In order for **us** to obtain insurance quotes, place and administer insurance policies, and/or deal with any claims or complaints, **we** need to collect and process **personal information** about **you**.

The types of **personal information** that are **processed** may include:

Types of personal information	Details:
Individual details ►	Name, address (including proof of address), other contact details (e.g. email and telephone numbers), gender, marital status, date and place of birth, nationality, employer, job title and employment history, and family details, including their relationship to you
Identification details ►	Identification numbers issued by government bodies or agencies, including your national insurance number, passport number, tax identification number and driving license number

Financial information ►	Bank account or payment card details, income or other financial information
Risk details ►	Information about you which we need to collect in order to assess the risk of being insured and provide a quote. This may include information relating to your health, criminal convictions, or other special types of personal information . For certain types of policy, this could also include telematics data
Policy information ►	Information about the quotes you receive and policies you take out
Credit and anti-fraud data ►	Credit history, credit scores, sanctions and criminal offences, and information received from various anti-fraud and sanctions databases, or regulators or law enforcement agencies relating to you
Previous and current claims ►	Information about previous and current claims, (including other unrelated insurances), which may include data relating to your health, criminal convictions, or other special types of personal information and in some cases, surveillance reports
Special types of Personal Information ►	Certain categories of personal information which may, depending on context, be considered sensitive, under Data Protection Laws , such as health, criminal convictions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric, or data concerning sex life or sexual orientation
Technical data ►	Internet protocol (IP) address, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website
Usage data ►	Information about how you use our website, products and services, including information from your visit from cookies, such as clickstream to, through and from our website (including date and time), items you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as clicks), and methods used to browse away from the page
Marketing, Event attendance and communications data ►	Your preference to receiving marketing material from us and third parties, and your communication preferences

Personal information does not include anonymized information.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from **your personal information** but is not considered **personal information** when anonymized as permitted under Data Protection Laws. However, if **we**

combine or connect aggregated data with **your personal information** so that it can directly or indirectly identify **you**, **we** treat the combined data as **personal information** which will be used in accordance with this privacy notice.

If you fail to provide personal information

Where **we** need to collect **personal information** by law, or under the terms of a contract **we** have with **you** and **you** fail to provide that data when requested, **we** may not be able to perform the contract **we** have or are trying to enter into with **you** (for example, to provide you with insurance broking services). In this case, **we** may have to cancel a service **you** have with **us**, but **we** will notify **you** if this is the case at the time.

SECTION 3: WHERE WE MIGHT COLLECT YOUR PERSONAL INFORMATION FROM

We might collect **your personal information** from various sources, including:

- **you** (for example by filling in forms or by corresponding with **us** by post, phone, email or otherwise. This includes personal information **you** provide when you:
 - make enquiries about or request **our** services;
 - subscribe to receive **our** newsletters or publications;
 - request marketing to be sent to **you**;
 - give **us** some feedback);
- **your** family members, employer (including trade or professional associations of which you are a member) or representative;
- other **insurance market participants**;
- credit reference agencies;
- anti-fraud databases, sanctions lists, court judgements and other databases;
- government agencies;
- Technical Data from analytics providers such as Google;
- forms on **our** website, and Technical Data and Usage Data about **your** equipment, browsing actions and patterns from **your** interaction with our website. **We** collect this personal information by using cookies and other similar technologies. Please see **our** [Cookies Notice](#) for further details;
- search information providers, e.g.:
 - Individual Details from publicly available sources such as the open electoral register and Companies House; or
 - Individual Details from data brokers or aggregators;

- claims forms;
- third parties who introduce business to **us**;
- in the event of a claim, third parties including the other party to the claim (**claimant**/defendant), witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers.

Which of the above sources apply will depend on **your** particular circumstances. For example, **we** might collect **your personal information** where:

- **you** have taken out an **insurance policy** through **us** (**you** are the **policyholder**), in which case **we** might collect **your personal information** from **you**, credit reference agencies, anti-fraud databases, sanctions lists etc.;
- a third party (such as a family member or your employer) has taken out an **insurance policy** through **us** for **your** benefit (**you** are an **insured** or **beneficiary**), in which case **we** might collect **your personal data** from **your** family member, employer etc.;
- **you** are a **claimant** or other person involved in a claim or relevant to a policy. E.g. **you** are making a claim against an **insurance policy** **you** have taken out through **us** or that a third party has taken out through **us** for **your** benefit, or **you** are making a claim against a third party's **insurance policy** that was taken out through **us**, or a third party is making a claim against an **insurance policy** **you** have taken out through **us**, in which case **we** might collect **your personal information** from **you**, other **insurance market participants**, witnesses, experts (including medical experts), loss adjustors, solicitors, and claims handlers etc.

SECTION 4: THE PURPOSES OF OUR PROCESSING OF YOUR PERSONAL INFORMATION

We set out below the purposes for which **we** might use and disclose **your personal information**:

Purposes:	
Relationship Management ►	- To provide you with information (for example in respect of products and services) that you request from us, and taking steps at your request prior to entering a contract
Quotation / Inception ►	- Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks - Evaluating the risks to be covered and matching to appropriate insurer/policy/premium - Payment of premium where the insured/policyholder is an individual

Policy Administration ►	- Client care, including communicating with you and sending you updates - Payments to and from individuals
Claims Processing ►	- Managing insurance and reinsurance claims - Defending or prosecuting legal claims - Investigation or prosecuting fraud
Renewals ►	- Contacting the insured/policyholder to renew the insurance policy - Evaluating the risks to be covered and matching to appropriate policy/premium - Payment of premium where the insured/policyholder is an individual
Other purposes outside of the insurance lifecycle but necessary for the provision of insurance throughout the insurance lifecycle period ►	- Complying with our legal and regulatory obligations - General risk modelling - Transferring books of business, company sales and reorganizations
Consultancy Services ►	- Setting you up as a client, including possible fraud, sanctions, credit and anti-money laundering checks - Client care, including communicating with you and sending you updates - Payments to and from individuals - General risk modelling - Analysis as part of the specific consultancy advice - Transferring books of business, company sales and reorganizations - Complying with our legal and regulatory obligations
Website Management ►	- To administer and protect our business and this website and for internal operations, including keeping our website safe and secure, data analysis, troubleshooting, testing, system maintenance, support, reporting and hosting of data, research, statistical and survey purposes - To use data analytics to improve our website, products/services, marketing, customer relationships and experiences, including to ensure that content from our website is presented in the most effective manner for you and for your device

Marketing ►	- To make suggestions and recommendations to you about products or services that may be of interest to you, to provide industry insight or to invite you to events - To measure and understand the effectiveness of marketing we serve to you and others and to deliver relevant marketing to you
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MARKETING

We strive to provide you with choices regarding certain personal information uses, particularly around marketing and advertising. We have established the following personal information control mechanisms:

Marketing Communications from us

We may use **your Individual Details and Policy Information** to form a view on what **we** think **you** may want or need, or what may be of interest to **you**. This is how **we** decide which products, services, events and industry insight may be relevant for **you**.

You will receive marketing communications from **us** if **you** have requested information from **us** (including for example where you have provided your explicit consent by way of opting-in to receiving our marketing communications in accordance with applicable law) or purchased services from **us**, or (where you are a corporate entity) where we consider the marketing material to be relevant to **you** and, in each case, **you** have not opted out of receiving that marketing. Such marketing communications may include risk or insurance related information or details of services, or products, or events, which **we** think may be of interest to **you**.

Third party marketing

We will get **your** consent (either by way of opting-in or opting-out, as required by applicable law) before **we** share **your** personal information with any company outside the Lockton group of companies for marketing purposes.

We may share your personal information with other companies in the Lockton group of companies, if allowed and appropriate, for marketing purposes.

Managing your Marketing Preference (including Opting Out)

You can manage your marketing preferences or ask **us** or third parties to stop sending **you** marketing messages at any time by following the opt-out links on any marketing message sent to **you** or by contacting our Data Protection Manager at any time.

Where **you** opt out of receiving these marketing messages, this will not apply to personal information provided to **us** as a result of a product/service purchase, product/service experience or other transactions, and will not affect communication relating to any such matters on which we are advising you.

COOKIES

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our [Cookies Notice](#).

CHANGE OF PURPOSE

We will only use **your personal information** for the purposes for which **we** collected it, unless we reasonably consider that **we** need to use it for another reason and that reason is compatible with the original purpose. If **you** wish to get an explanation as to how the **processing** for the new purpose is compatible with the original purpose, please contact our Data Protection Manager.

If **we** need to use **your personal information** for unrelated purposes, **we** will notify **you** and **we** will explain the legal basis which allows **us** to do so.

Please note that **we** may **process your personal information** without **your** knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

SECTION 5: DISCLOSURES OF YOUR PERSONAL INFORMATION

We may have to share **your** personal information with the parties set out below for the purposes set out in Section 4, they may be Data Controllers and/or Data Processors of **your** personal information.

- Internal third parties: other companies in the Lockton Group (which means **our** subsidiaries and ultimate holding company and its subsidiaries) who provide IT and system administration services and undertake leadership reporting.
- External third parties:
- Service providers who provide IT and system administration services;
- Professional advisers including lawyers, bankers, auditors and **insurers** who provide consultancy, banking, legal, insurance and accounting services;
- Credit reference agencies;
- Anti-fraud and sanctions database providers;
- Other **insurance market participants** such as **intermediaries, insurers and reinsurers**;
- Banks;
- Claims handlers;
- Solicitors;
- Auditors;
- Loss adjusters;

- Experts;
- Third parties involved in claims/investigations/prosecutions;
- Private investigators;
- Police;
- Courts;
- OSFI, federal and provincial privacy commissioners and other regulators;
- Third parties to whom **we** may choose to sell, transfer, or merge parts of **our** business or **our** assets. Alternatively, **we** may seek to acquire other businesses or merge with them. If a change happens to **our** business, then the new owners may use **your** personal information in the same way as set out in this privacy notice.

SECTION 6: CONSENT

In order to arrange and provide insurance coverage and deal with insurance claims in certain circumstances **we** and other **insurance market participants** may need to process **your special types of personal information**, such as medical and criminal convictions records, as set out against the relevant purpose.

Your consent to this processing will be necessary, whether obtained by us or on our behalf, to enable us and the other insurance market participants to achieve this.

You may withdraw your consent to such processing at any time. However, if you withdraw your consent this will impact our, and the other insurance market participants', ability to place, administer and provide insurance or pay claims.

SECTION 6: PROFILING AND AUTOMATED DECISION MAKING

You will not be subject to decisions that are based exclusively on automated decision-making unless **we** have notified **you** in compliance with Data Protection Laws.

SECTION 7: DATA SECURITY

Unfortunately, the transmission of data over the internet or any website cannot be guaranteed to be completely secure from intrusion. However, **we** have put in place appropriate physical, electronic and procedural security measures designed to prevent your personal information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed.

We have put in place procedures to deal with any suspected **personal information** breach and will notify **you** and any applicable regulator of a breach where **we** are legally required to do so.

SECTION 8: RETENTION OF YOUR PERSONAL INFORMATION

We will keep **your personal information** only for so long as is necessary and for the purpose for which it was originally collected. In particular, for so long as there is any possibility that either **you** or **we** may wish to bring a legal claim under or in relation to **your insurance**, or where **we** are required to keep **your personal information** due to legal, regulatory, accounting or reporting reasons.

To determine the appropriate retention period for **personal information**, **we** consider the amount, nature, and sensitivity of the **personal information**, the potential risk of harm from unauthorized disclosure of **your personal information**, the purposes for which **we process** your **personal information** and whether **we** can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances, and as permitted under Data Protection Laws, **we** may anonymize your personal information (so that it can no longer be associated with **you**) for research or statistical purposes in which case **we** may use this information indefinitely without further notice to **you**. When we anonymized information, we do so according to generally accepted best practices and as permitted under Data Protection Laws.

SECTION 9: INTERNATIONAL TRANSFERS

We may process, store, and transfer **your** Personal Information in and to other jurisdictions from the one in which **you** reside, with different privacy laws that may or may not be as comprehensive as Canadian law. In these circumstances, the governments, courts, law enforcement, or regulatory agencies of that country may be able to obtain access to **your** Personal Information through the laws of the foreign country.

If **you** would like further details of how **your personal information** would be protected if processed outside the jurisdiction in which you reside, please contact **our Data Protection Manager**.

SECTION 10: YOUR RIGHTS

If **you** have any questions about this privacy notice or in relation to **our** use of **your personal information**, we recommend **you** contact **our Data Protection Manager**. Under certain conditions and as available under applicable Data Protection Laws, **you** may have the right to request us to:

- provide you with access to the personal information we have about you;
- communicate to another organization (**or a nominee (Data portability)**) with a copy of the **personal information** that **you** have provided to us;
- delete the personal information we have about you if it is no longer necessary for the purposes for which you provided it and we are not required by law to retain it;
- update any inaccuracies in the **personal information** we hold;
- where processing is based on consent, to withdraw **your** consent so that **we** stop that particular processing; and
- object to direct marketing.

In certain circumstances, **we** may need to restrict the above rights in order to safeguard the public interest (e.g. the prevention or detection of crime) and **our** interests (e.g. the maintenance of legal privilege) or we may be prohibited by law because granting your request would disclose personal information about a third party.

If **you** wish to exercise any of the rights set out above, please contact **our Data Protection Manager**.

While we will always respect your rights, if you are not satisfied with our response, you have the right to lodge a complaint with the Office of the Privacy Commissioner of Canada.

No fee required

You will not have to pay a fee to access **your personal information** (or to exercise any of the other rights). Alternatively, **we** may refuse to comply with **your** request where permitted under Data

Protection Law and will inform you of our decision and the reasons for it within 30 days of receiving your request.

What we may need from you

We may need to request specific information from **you** to help **us** confirm **your** identity and ensure **your** right to access **your personal information** (or to exercise any of **your** other rights). This is a security measure to ensure that **personal information** is not disclosed to any person who has no right to receive it. **We** may also contact **you** to ask **you** for further information in relation to **your** request to speed up **our** response.

Time limit to respond

We will respond to all legitimate requests within 30 days. We may ask for an extension of 30 days if meeting the time limit would unreasonably interfere with the activities of our organization, or if consultations are necessary to respond to your request, or if we need to convert your personal information into an alternative format. In either case, we will notify you and provide reasons. You have the right to make a complaint to the Office of the Privacy Commissioner of Canada about our request for an extension.

SECTION 11: GLOSSARY OF KEY TERMS

Key insurance terms:

Beneficiary is an individual or a company that an **insurance policy** states may receive a payment under the **insurance policy** if an insured event occurs. A beneficiary does not have to be the **insured/policyholder** and there may be more than one beneficiary under an **insurance policy**.

Claimant is either a **beneficiary** who is making a claim under an **insurance policy** or an individual or a company who is making a claim against a **beneficiary** where that claim is covered by the **insurance policy**.

Claims processing is the process of handling a claim that is made under an **insurance policy**.

Quotation is the process of providing a quote to a potential **insured/policyholder** for an **insurance policy**.

Inception is when the **insurance policy** starts.

Insurance is the pooling and transfer of risk in order to provide financial protection against a possible eventuality. There are many types of insurance. The expression **insurance** may also mean **reinsurance**.

Insurance policy is a contract of insurance between the **insurer** and the **insured/policyholder**.

Insurance market participant(s) or participants: is an **intermediary**, **insurer** or **reinsurer**.

Insured/policyholder is the individual or company in whose name the **insurance policy** is issued. A potential **insured/policyholder** may approach an **intermediary** to purchase an **insurance policy** or they may approach an **insurer** directly or via a price comparison website.

Insurers: (sometimes also called underwriters) provide insurance cover to **insured/policyholders** in return for **premium**. An **insurer** may also be a **reinsurer**.

Intermediaries help **policyholders** and **insurers** arrange insurance cover. They may offer advice and handle claims. Many insurance and reinsurance policies are obtained through **intermediaries**.

Policy administration is the process of administering and managing an **insurance policy** following its inception.

Premium is the amount of money to be paid by the **insured/policyholder** to the **insurer** in the **insurance policy**.

Reinsurers provide insurance cover to another **insurer** or **reinsurer**. That insurance is known as reinsurance.

Renewal is the process of the **insurer** under an **insurance policy** providing a **quotation** to the **insured/policyholder** for a new **insurance policy** to replace the existing one on its expiry.

You or **your** refers to the individual whose **personal information** may be processed by **us** and other **insurance market participants**. **You** may be the insured, beneficiary, **claimant** or other person involved in a claim or relevant to an **insurance policy**.

Key data protection terms:

Data Protection Laws means all laws and regulations relating to the Processing of Personal Information in Canada, the *Personal Information Protection and Electronic Documents Act* ("PIPEDA"), the *Québec Act Respecting the Protection of Personal Information in the Private Sector*, and other applicable provincial privacy laws, as these may be in force from time to time.

Data Controller is an entity which collects and holds Personal Information. It decides what personal information it collects about you and how that personal information is used.

Personal information means information that, alone or in combination with other information, is linked or can be linked to you, other than a business title or business contact information when used or disclosed for the purpose of business communications.

Processing of personal information includes collecting, using, storing, disclosing or erasing your personal information.

v. 3. 23/06/2026