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## **Privacy Policy**

Norbram Group Insurance Benefits Inc.

*Last Revised: August 2025*

### **Introduction**

At Norbram, we recognize the importance of your privacy and take it very seriously. This Privacy Policy describes how we collect, use and process your information when you use our Services. All of the forms of data, content and information described below are collectively referred to as “*information*.” By using our Services, you confirm that you have read, understood and agree to be legally bound by the provisions of this Privacy Policy and our Terms of Use.

### **Application and Scope**

This Privacy Policy applies to any customer or personal information (as defined below in the sections entitled “Definition of Customer Information” & “Definition of Personal Information”) collected or generated by Norbram. Individuals, whose personal information is collected by Norbram, are protected by the rights and safeguards contained in this Privacy Policy.

### **Definition of Customer Information**

This Privacy Policy, for corporate and business customers, applies to any information collected by Norbram about company history, corporate structure, contact information, financial information including bank account data, insurance history, and information relevant to the provision of our Services.

### **Definition of Personal Information**

For the purposes of this policy, personal information means any information about an identifiable individual. This may include, for example, individual names, dates of birth, remuneration details, employment information, family status, dependent information, and contact details you have given in connection with an account with us, or such other information you have given us to receive information about or use our Services.

### **Collection and Use of Personal Information**

Norbram will not collect or use personal information for any other or new purpose without obtaining consent, unless required or authorized by law.

We use the information you provide to provide you with Services; to communicate with you; to operate, maintain, and enhance the Services; and to fulfill your specific requests.

Norbram collects personal information when you register for our Services, to establish, develop and preserve our business relationships. In order to establish and administer your account, to



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provide Services, and to respond to inquiries, we will collect customer and personal information as outlined above.

Furthermore, Norbram may also use the information that we collect from you to:

Provide, operate, maintain and improve the Services;

- Provide and deliver the Services and features you request, process and complete transactions, and send you related information, including purchase confirmations and invoices;
- Respond to your comments, questions, and requests and provide customer service and support;
- Communicate with you about Services, features, surveys, newsletters, offers, promotions, contests and events, and provide other news or information about us and our select partners;
- Monitor and analyze trends, usage, and activities in connection with the Services;
- Personalize and improve the Services, and provide content, features, and/or advertisements that match your interests and preferences or otherwise customize your experience on the Services;
- Link or combine with other information we receive from third parties to help understand your needs and provide you with better service;
- Enable you to communicate, collaborate, and share files with users you designate;
- For other purposes about which we notify you.

### **Your Consent**

By purchasing our Services you are providing your consent to the collection, use and disclosure of customer and personal information as set out in this Privacy Policy. In certain circumstances, Norbram obtains consent from the individuals concerned for the collection, use or disclosure of personal information through various means: orally or through written documents, including agreements, forms or other printed or electronic communications.

### **Withdrawing your consent**

You may withdraw your consent at any time with reasonable notice and subject to any legal or contractual restrictions. Without such consent, Norbram may limit the services or products it provides you.

To opt-out of commercial emails, simply click the link labeled “unsubscribe” or “opt-out” at the bottom of any commercial electronic communication we send you. Please note that even if you opt-out of promotional communications, we may still need to contact you with important information about your account.



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You may decide that you prefer Norbram not to use your personal information to promote new and/or additional products and services which may be of interest to you and refuse that we contact you by mail or telephone for marketing or quality control purposes. If this is the case, you may advise us by contacting customer service or contacting us using the information detailed in the How to Contact Us section below.

### **Sharing of Personal Information with Third Parties**

To fulfill the purposes set out in this Privacy Policy, your personal information may be made available by Norbram to third-parties or service providers. Third parties and service providers generally include Insurance Companies and Managing General Agencies involved in the procurement or delivery of services related to your account. Norbram will NOT sell, rent or trade your personal information to any third party. Only those employees of Norbram, or trusted third party contractors, who need access for business reasons, or whose duties reasonably so require, will be granted access to personal information.

Norbram may use third party service providers to perform services on your behalf. For example, third party services may be utilized to support policy administration, the Request for Proposal process, as well as the the preparation of claims reporting and renewal reporting. We only provide third parties with the strict necessary amount of information in order for them to provide the Services required to carry out our obligations to you. Norbram will endeavour to establish contractual agreements requiring that those third parties adhere to confidentiality and security procedures and protections that are, at a minimum, equivalent to those employed by Norbram itself.

In connection with a sale or transfer of business or assets, an amalgamation, re-organization or financing of parts of our business, we may disclose limited information to a third party. However, in the event the transaction is completed, your personal information will remain protected by applicable privacy laws. In the event the transaction is not completed, we will require the other party not to use or disclose your personal information in any manner whatsoever and to completely delete such information.

Information may also be disclosed to our accountants, auditors, agents and lawyers in connection with the enforcement or protection of our legal rights.

### **Cross-border Transfer of Personal Information**

Norbram may transfer certain personal information across geographical borders to other Norbram partners and their data facilities. Norbram, via our service providers, may also store personal information in a jurisdiction other than where you are based and such jurisdiction may not provide the same level of protection for your personal information as your home country. By providing your information to Norbram, you are consenting to this transfer and/or storage of your information



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across borders. Your personal information will only be transferred if appropriate or suitable safeguards are in place.

#### **Disclosure of Personal Information as Permitted or Required by Law**

Your privacy is very important to us. We do not sell or disclose your personal information to third parties except as provided in this Privacy Policy. Your information may be disclosed to third parties only in the following circumstances:

- We may disclose your personal information if required to do so by law or subpoena.
- We may disclose your information if we believe that such action is necessary to: (a) protect and defend our rights and property, our Services and/or users of our Services; (b) enforce the terms of use with respect to our Services (including investigation of potential violations thereof); (c) detect, prevent or otherwise address fraud, security or technical issues; or (d) protect the safety of users of the Services, us or third parties. These third parties may have access to your personal information only for purposes of performing these tasks on our behalf and under obligations as outlined in this Privacy Policy.

#### **Security of Personal Information**

Your personal information is protected for your privacy and security. We safeguard the security and confidentiality of the data you send us with physical, technical, and managerial procedures. Please be aware that, despite our best efforts, no security measures are perfect or impenetrable. While we strive to protect your personal information, we cannot ensure the security of the information you transmit to us.

#### **Retention**

Personal information will be retained only as long as necessary for the fulfilment of the purposes for which it was collected and for which consent was received, unless otherwise required by law. Personal information that is no longer required to fulfil the identified purposes will be destroyed, erased or made anonymous. Norbram has developed and implemented detailed retention principles, and will ensure destruction of personal information in a method that prevents improper access.

#### **Access and Correction**

Norbram respects your right to access, update and correct your personal information. If you have submitted personal information to Norbram, you have the right to reasonable access to that data to correct any inaccuracies. You can also make a request to update or remove information about you and we will make all reasonable and practical efforts to comply with your request, so long as it is consistent with applicable law and professional standards.



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If you need assistance updating your personal information, please contact us using the contact information detailed in the How to Contact Us section below.

### **Website Privacy Policy**

By visiting [www.norbram.ca](http://www.norbram.ca), you accept the practices described in this Privacy Statement. We only use the information you provide for such purposes as providing quotes, improving our site, and communicating with you. We utilize cookies in order to ensure the user experience.

*Cookies* – Small text files (typically made of up of letters and numbers) placed in the memory of your browser or device when you visit a website or view a message. Cookies allow a website to recognize a particular device or browser. There are several types of cookies:

- Session cookies expire at the end of your browser session and allow us to link your actions during that particular browser session.
- Persistent cookies are stored on your device in between browser sessions, allowing us to remember your preferences or actions across multiple sites.
- First-party cookies are set by site you are visiting.
- Third-party cookies are set by a third party site separate from the site you are visiting.

Cookies can be disabled or removed by tools that are available as part of most commercial browsers. The preferences for each browser you use will need to be set separately and different browsers offer different functionality and options.

Norbram will NOT sell, rent or trade your information to any third party. Only those employees of Norbram, or trusted third party contractors, who need access for business reasons, or whose duties reasonably so require, will be granted access to information. Norbram Group Insurance Benefits Inc. reserves the right to co-operate with local, provincial and national officials in any investigation requiring either personal information – including any personal information provided online through our website – or reports about lawful or unlawful user activities on the website.

### **How to Contact Us**

If you have questions, concerns or complaints regarding this Privacy Policy or the personal information that Norbram has about you, please contact:

Charlie Teasdale, Privacy Officer Norbram

15074 Yonge St., Aurora, ON, L4G 1M2

By e-mail: [c.teasdale@norbram.ca](mailto:c.teasdale@norbram.ca)

By phone: 1-800-667-2726



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### **Changes to our Privacy Policy**

We reserve the right, at our sole discretion, to modify this Privacy Policy at any time. If we modify this Privacy Policy, we will post the modification on the website and/or provide you with notice of the modification. We will also update the date at the top of this Privacy Policy. By continuing to access or use the Services after we have posted such a modification or have provided you with notice of a modification, you are indicating that you agree to be bound by the modified Privacy Policy. If the modified Privacy Policy is not acceptable to you, please contact us using the contact information detailed in the How to Contact Us section.