



GCS - ITPA Division

Privacy Policy



Privacy Policy

At Europ Assistance - Global Corporate Solutions (GCS) ITPA Division we respect the privacy of your personal information.

This Privacy Policy applies to the personal information that the GCS - ITPA Division collects, uses or discloses in the course of providing services to our Clients and their Membership

What is personal information?

Personal information means information that can be used to identify an individual.

What personal information does the GCS - ITPA Division collect and use?

The GCS - ITPA Division collects personal information, in the normal conduct of its business in supplying Medical, Travel and other assistance and claims services to Insurance Companies and their Membership. Such information includes, but is not limited to:

- Name and addresses of the Family members
- Birth Dates
- Contact information including Fax, Phone and Email addresses
- Insurance Policy Information
- Medical Conditions both pre existing and current
- Medical Claim information from Medical Providers like Hospitals, Clinics and Doctors
- Policy information about you and your family and the type of coverage you have
- Medical records for you and covered members of the plan
- Information regarding other travelers, such as their relationship to the insurance policyholder
- Information about Students and proof of coverage
- Information related to dates and places of travel

If you provide the GCS - ITPA Division with the personal information of other individuals, you confirm that they consent to our collection, use and disclosure of their personal information for the purposes outlined in this policy.

Global Corporate Solutions - ITPA Division

150 Commerce Valley Drive West, 9th Floor, Thornhill, Ontario L3T 7Z3 Canada - Tel. +1 (905) 669 4333 - Fax +1 (905) 669 2318
www.gcs.europ-assistance.com



The GCS - ITPA Division will collect personal information directly from our Internet, Call Recording Systems, Applicants, Policyholders, Medical Service Providers and Claimants. The GCS - ITPA Division and its affiliates may also collect personal information from each other in accordance with this policy. The GCS - ITPA Division may also collect your personal information from third parties in accordance with this policy.

For example, the GCS - ITPA Division may collect personal information about you from your doctor, healthcare facilities in Canada, the USA or abroad, government and private healthcare insurers and from family members and travelling companions of an insured or claimant. The GCS - ITPA Division may also collect and analyze information from publicly available demographic data in the jurisdictions in which the GCS - ITPA Division operates.

How does the GCS - ITPA Division use personal information?

The GCS - ITPA Division may use your personal information to:

- Process, administer and manage your travel medical policies
- Determine eligibility for, and provide requested products or services
- Better understand your needs and the ways in which we can improve our products and services
- Establish and maintain communication with you, including responding to your inquiries
- Investigate claims and determine eligibility for insurance benefits
- Process payments to you and the Service Provider
- Provide travel assistance services
- Meet any legal, regulatory, processing or security requirement that requires collection, use or disclosure of your personal information
- Inform you about products and services that we offer
- Analyze your use of GCS - ITPA Division's products and services
- Investigate and prevent fraud
- Conduct surveys or research for the internal use by the GCS - ITPA Division and its affiliates only.

If the GCS - ITPA Division requests additional personal information or intends to use or disclose your personal information differently than described in this Privacy Policy, we will advise you at or before the time of collection, use or disclosure (as the case may be) as to how we will handle that personal information, and obtain your consent.

Global Corporate Solutions - ITPA Division

150 Commerce Valley Drive West, 9th Floor, Thornhill, Ontario L3T 7Z3 Canada - Tel. +1 (905) 669 4333 - Fax +1 (905) 669 2318
www.gcs.europ-assistance.com



How does GCS - ITPA Division use service providers?

The GCS - ITPA Division may use service providers to perform certain services on our behalf. For example, we may use service providers to authorize and process payments, send email or other communications, run contests, conduct customer research or manage and analyze data. Our service providers are only given the information they need to perform their designated functions, and they are not authorized to use or disclose personal information for their own marketing or other purposes. We require by Contract, all service providers to keep your information confidential and secure and to have privacy standards and security standards relating to personal information that are comparable to those of the GCS - ITPA Division.

Your personal information may be processed and stored in countries other than Canada, and may be accessible to the governments, courts or law enforcement or regulatory agencies of such countries. For written information about the GCS - ITPA Division's policies and procedures with respect to the use of service providers outside Canada, or if you have questions about the collection, use, disclosure or storage of personal information by service providers outside Canada on behalf of the GCS - ITPA Division, please contact the Chief Privacy Officer using the contact information set out below.

How does the GCS - ITPA Division disclose personal information?

The GCS - ITPA Division will not disclose, trade, rent, sell or otherwise transfer your personal information, without your consent, except as otherwise set out herein.

Affiliates: The GCS - ITPA Division may share your personal information with our affiliates and with our suppliers of goods and services, representatives, distributors, reinsurers and authorized administrators, which are responsible for administering or providing products and services on our behalf.

Sale of Business: The GCS - ITPA Division may transfer your personal information as an asset in connection with any contemplated or actual sale, merger or other disposal of all or part of our business or assets, or as part of a corporate reorganization or other change in corporate control, including for the purposes of determining whether to proceed with such transaction or fulfilling any records or other reporting requirements to such parties. In such circumstances, we will ensure that any transfer of personal information is subject to strict data protection security protocols.

Global Corporate Solutions - ITPA Division

150 Commerce Valley Drive West, 9th Floor, Thornhill, Ontario L3T 7Z3 Canada - Tel. +1 (905) 669 4333 - Fax +1 (905) 669 2318
www.gcs.europ-assistance.com



Legal: The GCS - ITPA Division, its Canadian and non-Canadian service providers, may provide your personal information in response to a search warrant or other legally valid inquiry or order, or to an investigative body in the case of a breach of an agreement or contravention of law, or as otherwise required by applicable Canadian or foreign law. We may also disclose personal information where necessary for the establishment, exercise or defense of legal claims, to investigate or prevent actual or suspected loss or harm to persons or property, or as otherwise required or permitted by law.

How will the GCS - ITPA Division protect my personal information?

Only authorized GCS - ITPA Division employees and agents who need your personal information to provide you with the products and services requested will have access to your personal information, unless access by others is authorized by this policy or applicable law. The GCS - ITPA Division takes numerous steps to protect your personal information against loss, theft and unauthorized access, use, alteration, duplication, destruction or disclosure. Such controls include technological, physical and organizational safeguards, depending on the sensitivity and the format of the information. The GCS - ITPA Division will destroy, erase or render anonymous personal information no longer required for the stated purposes or for a legal or legitimate business requirement.

The GCS - ITPA Division is guided in its protection policy by the Personal Information Protection and Electronic Documents Act (PIPEDA) in Canada and the Health Insurance Portability and Accountability Act (HIPPA) in the United States. Both sets of Legislation provide for commercially reasonable protection of your Personal Information.

Data Security, Integrity, and Access

The GCS - ITPA Division employs physical, electronic, and managerial safeguards, including education and training of our personnel, designed to provide the personal information in our possession with reasonable protection from accidental loss or destruction, improper use, alteration, or disclosure.

We use Industry standard encryption and security measures to protect Personal information collected or displayed through a Web site, sent via Email or stored on our Computers and Servers.

Global Corporate Solutions - ITPA Division

150 Commerce Valley Drive West, 9th Floor, Thornhill, Ontario L3T 7Z3 Canada - Tel. +1 (905) 669 4333 - Fax +1 (905) 669 2318
www.gcs.europ-assistance.com



We believe in Security 'In Depth'. Our physical premise is controlled by card access and only selected individuals can enter our Server room. Anti Virus programs from different vendors scan for infections continuously and we perform yearly penetration audits of our Network by Professional Ethical Hackers.

However, while we take Commercially Reasonable care in the protection of your information, we cannot guarantee Personal Information is not compromised when sent over the Intranet, inbound or outbound Email or during Voice Communications.

How do I access or correct my personal information, or make inquiries or submit comments to GCS - ITPA Division?

You have the right to access, update, and correct inaccuracies in your personal information in our custody and control, subject to certain exceptions prescribed by law. If you wish to update or request access to, or correction of, your personal information in the GCS - ITPA Division's records, or to make inquiries or complaints, please contact our Chief Privacy Officer in writing at:

Chief Privacy Officer
Europ Assistance - Global Corporate Solutions ITPA Division
150 Commerce Valley Drive West, 9th Floor
Thornhill, Ontario L3T 7Z3
Canada

Tel: +1 905-669-4333

Fax: +1 905-669-2318

Email: [Privacy Officer - GCS - ITPA Division](#)

We may request certain personal information for the purposes of verifying the identity of an individual seeking access to his or her personal information records. Some information may not be accessed or disclosed in certain circumstances, for example, if the information requested contains personal information of other persons or for other legal reasons.

If you have any inquiries or comments regarding this Privacy Policy or GCS - ITPA Division's privacy practices, please write to or contact our Chief Privacy Officer at the same addresses listed above.

Global Corporate Solutions - ITPA Division

150 Commerce Valley Drive West, 9th Floor, Thornhill, Ontario L3T 7Z3 Canada - Tel. +1 (905) 669 4333 - Fax +1 (905) 669 2318
www.gcs.europ-assistance.com



Changes to this Privacy Policy

The GCS - ITPA Division reserves the right to change this Privacy Policy from time to time and will post the Policy on our website. We recommend that you periodically review it.

Internet Security, Mobile Application, Email & Privacy

In general, you may visit our website or use of our applications without telling us who you are or actively submitting any personal information. However, we collect the IP (Internet Protocol) addresses of all visitors to our website and other related information such as page requests, browser type, operating system and average time spent on our Website. We use this information to help us understand our Website activity, and to monitor and improve our Website.

To access our products and services on-line, the GCS - ITPA Division requires you to identify yourself. The GCS - ITPA Division uses “cookies” to identify you as a registered and/or returning visitor. Cookies are files sent from a website to a visitor’s computer which may then be stored on your hard drive so we can recognize you when you return. The GCS - ITPA Division uses both session and permanent cookies. These cookies entitle members to enter member exclusive areas of the website and also to “welcome back” members with pre-established member exclusive privileges. This data is used for generation of statistics and to personalize future visits or communications. We use cookies, pixels and pixel tracking on the pages of our website where you are prompted to log in or that are customizable for the collection of aggregate data. If you have registered with our website, these cookies (1) may let us know who you are, (2) may be necessary to access your account information (stored on our computers) in order to deliver products and personalized services, and (3) will provide us with information that we will use to personalize our website in accordance with your preferences. You may set your web browser either to notify you when you receive a cookie or to not accept certain cookies; however, without enabling cookies, you may not be able to take advantage of certain features of the website.

We use Industry Standard Transport Layer Security (TLS) for our Email Server to communicate with Email Systems outside the GCS - ITPA Division. Where the receiving system cannot understand TLS, we use Cisco Email Security (Iron Port) to encrypt sensitive messages and protect your privacy. In some cases the recipient of Email from us may decide to request us to send email in an unsecure format with the

Global Corporate Solutions - ITPA Division

150 Commerce Valley Drive West, 9th Floor, Thornhill, Ontario L3T 7Z3 Canada - Tel. +1 (905) 669 4333 - Fax +1 (905) 669 2318
www.gcs.europ-assistance.com



understanding that anyone intercepting this unsecured Email may read the contents. In these cases, the GCS - ITPA Division cannot guarantee your privacy is protected.

When you leave our Website or Mobile Application

This policy discloses the privacy practices for our Operations, Website and Mobile Applications. However, our site may contain links to other sites that the GCS - ITPA Division and its affiliates do not own or operate. We provide links to third party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. Once you link to another website, you are subject to the privacy and security policies of the new site. We encourage you to read the privacy policies of all websites you visit, especially if you share any personal information. We do not have any control over such websites, and therefore we have no responsibility or liability for the manner in which the organizations that operate such linked websites may collect, use or disclose, secure and otherwise treat your personal information.

Revised: February 3, 2014