

**PRIVACY AND PROTECTION
OF PERSONAL INFORMATION POLICY
ELLIPSE INSURANCE**

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**PRIVACY POLICY
AND PROTECTION OF PERSONAL INFORMATION
ELLIPSE INSURANCE**
(The “Policy”)

Effective Date: December 2024

Last Updated: September 2026

1. Purpose of the Policy

Definition. In this Policy, the term “personal information” refers to any information collected by Ellipse Insurance Inc. and its subsidiaries (“we,” “us,” and “our”) that, alone or in combination with other information, allows for the direct or indirect identification of a natural person (“you,” “your,” and “yours”), excluding business contact information. “Business contact information” refers to information concerning an individual’s role within a company, such as their first name, last name, title, and position, as well as the address, email address, and phone number of their workplace.

Legal Framework. In accordance with the Act respecting the protection of personal information in the private sector (RLRQ, c. P-39.1) (the “Private Sector Act”), as amended by the Act to modernize legislative provisions regarding the protection of personal information (Act 25), we implement policies and practices designed to govern our privacy governance and operations, including this Policy. This Policy, as well as any amended version thereof, is subject to the applicable laws of the Province of Quebec.

Objectives of the Policy. The primary purpose of this Policy is to provide you with information, in simple and clear language, regarding:

- the methods we use to collect your personal information;
- the categories of personal information we may collect and the purposes for which we collect it;
- how we may use your personal information, as well as the categories of third parties to whom we may disclose such personal information;
- the rights you have regarding the personal information we hold about you, namely the right to access your personal information, the right to correct your personal information under certain circumstances, and the right to withdraw your consent to the use and disclosure of your personal information;
- the various security measures we have put in place to protect the confidentiality of your personal information;
- how your personal information is retained, destroyed, and/or anonymized; and
- how you can contact us to ask questions, share feedback, or, if necessary, file a complaint regarding this Policy or, more generally, regarding our processing of your personal information.

2. What personal information do we collect, and how do we collect it?

List of methods. We may collect your personal information through the following methods:

- Automatically when you visit our website, which is accessible via the following hyperlink: <https://ellipse.ca/en/> (the “Site”), or when you submit a request via our virtual agent Elli (the “Platform”), or when you log in to our digital space reserved for user account holders (the “Customer Area”), in particular through the use of cookies and other similar technologies (collectively: “Digital Trackers”);
- When you provide us with personal information through the Site, the Platform, and/or the Customer Portal, hereinafter collectively referred to as “Digital Tools”;
- When you communicate with our authorized representatives (in-person communications, videoconferences, emails, instant messaging, phone calls, faxes, etc.);
- We may record calls, chat sessions, and other communications you have with us to ensure the quality of our customer service, confirm our discussions and your instructions, resolve a complaint, or for staff training purposes;
- We may share your personal information with our current or future affiliates, including our subsidiaries, joint ventures, or other companies under common control. In such cases, we will require our affiliates to comply with this Privacy Policy.

2.1 Personal Information Collected Automatically

Information Collected Automatically. When you access the Site, we automatically collect the following information:

Technical information about your device and connection

- Your device’s IP (“Internet Protocol”) address;
- Device type (computer, tablet, smartphone), brand, and model;
- The type and version of the operating system (Windows, macOS, iOS, Android, Linux, etc.);
- The name and version of the browser (Chrome, Microsoft Edge, Firefox, Safari, Brave, Opera, etc.);
- The language configured in the browser;
- The screen resolution and dimensions of the display window;
- The device’s time zone;
- The Internet service provider;
- The approximate location derived from the IP address (country, province or region, city), without precise geolocation.

Information About Your Browsing Activity

- The date, time, and duration of your visit;
- The pages you viewed and the time spent on each;
- The URL of the website or app from which you accessed the Site (referring site);
- Tracking parameters contained in the URL used to access the Site (UTM parameters, campaign identifiers, ad click identifiers such as “gclid,” “wbraid,” or “fbclid”);
- Searches performed in the Site’s internal search engine;
- Links you click on, including links to external sites;
- Documents you download;
- Whether you start, abandon, or submit a form;
- Clicks on displayed phone numbers and email addresses;
- Scrolling through pages and your other interactions with content (watching a video, opening a section, etc.);
- Error messages displayed, including “page not found” errors (404);
- The Site’s performance metrics, such as load times.

Information Logged in Our Server Logs

- The method and protocol of requests sent to our servers;
- The response codes returned by our servers;
- The volume of data transferred;
- The browser identification string (“user agent”).

Identifiers Assigned by Cookies and Similar Technologies

- Random identifiers assigned by cookies, pixels, web beacons, and local browser storage, which allow us to recognize your browser from one page or visit to the next without identifying you by name;
- A session ID, the number of sessions, and an indication of whether or not this is your first visit;
- Your cookie preferences, the date they were selected, and the version of the notice to which they apply.

Phone Calls Initiated from the Site. When you dial a phone number displayed on the Site, that number may be a tracking number that redirects your call to our regular lines. We then collect the date, time, and duration of the call, the area code from which the call originated, and the page or advertising campaign that led to the call.

Consent and Scope. Some of this information is necessary for the operation, security, and integrity of the Site and is collected as soon as you arrive. Other information, particularly that collected for audience measurement, analysis, or advertising purposes, is collected only if you have consented to it via the cookie management tool. You may request to modify or withdraw your consent at any time by emailing us at the following address: info@ellipse.ca.

Taken on its own, this information does not identify you. When combined with information you voluntarily provide to us, it is treated as personal information within the meaning of the Private Sector Privacy Act.

Digital Markers. Digital Markers are files stored on a Data Subject's browser when they access our Digital Tools to facilitate or improve current and future interactions between the browser being used and the server on which the Digital Tools are hosted. For example, cookies (commonly referred to as "Cookies"), HTML5 storage specifications, web beacons, and embedded scripts are Digital Trackers. For a comprehensive list of the Digital Trackers we use, please refer to the summary table attached as an [appendix](#) to this Policy.

2.2 Personal Information Collected When Creating a User Account

Creating a User Account. To access the Customer Portal, which is available exclusively to our customers, you must create a user account through the Website. As part of the user account creation process, we collect the following personal information:

- Your first and last name;
- Your email address;
- Your phone number;
- Your policy number.

You will then receive a code via email that you can use to confirm the creation of your account.

2.3 Personal Information Collected Through Voluntary Communications

Voluntary Communications. We may collect certain personal information that you voluntarily provide to us in connection with (i) your use of our Digital Tools, (ii) your interactions with our authorized representatives (in-person communications, videoconferences, emails, instant messaging, phone calls, faxes, etc.), and (iii) your applications for job openings. The personal information we may collect in this manner includes the following:

- Personal information that identifies you (first name, last name, and contact information (street address, email address, date of birth, and phone numbers)) (for the purposes of this Section 2.2: "Identifying Information");
- Personal information necessary to (i) provide you with insurance brokerage and/or financial services (collectively: the "Services") (ii) perform the Services you have requested based on our service offering (Identifying Information, criminal history, claims history (including details related to claims), information regarding the property you wish to insure (including photographs), as well as any other personal information necessary depending on the risk category);
- Personal information provided as part of the job application you submitted to us (identification information, sex (or gender identity), date of birth, languages spoken, educational background, work experience, professional affiliations, and any other personal information voluntarily provided through a resume or cover letter);

- Personal information that you are required or asked to provide to us due to the nature of your relationship with us (for employees: identification information, sex (or gender identity), languages spoken, educational background, work experience, professional affiliations, Social Insurance Number, health information, and financial information; for directors: a copy of a government-issued ID, pursuant to the Act respecting the Legal Publicity of Corporations (RLRQ, c. P-44.1);
- Personal information provided in connection with a transaction (business transaction) you wish to conduct with us (identification information, payment method, and payment details); and
- Personal information contained in the exchanges that make up your communication history with us and our authorized representatives (in addition to all personal information listed in this Section 2.2, including evidence of consent, notices, comments, and complaints).

Please note that you are responsible for obtaining the consent of any individual other than yourself before providing us with any personal information concerning that individual. Similarly, we do not knowingly collect any personal information regarding individuals under the age of fourteen (14), unless we have obtained the prior explicit consent of a parent or guardian. If you have reason to believe that we hold such personal information that may have been collected inadvertently, please notify our Privacy Officer (whose contact information is provided below in Section 8) so that we may conduct the necessary verifications and, if applicable, securely destroy the personal information in question.

3. For what purposes do we collect your personal information?

Purposes of collecting personal information. The “purposes” of collection are the reasons that justify our need to collect your personal information.

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

- To identify you so that we can interact with you appropriately;
- To open an internal file in order to provide you with the Services and, if you authorize us to do so, to perform them;
- As part of providing the Services: (i) to identify the most appropriate products based on your situation (based on the personal information you provide to us); (ii) to facilitate the conclusion of contracts between you and the relevant insurers, wholesalers, and/or partners; and (iii) to communicate with you on an ongoing basis to inform and advise you regarding the products you have purchased;
- Process the application you submit to us, whether it is an unsolicited application or one related to a job posting we have published;
- Communicate with you to provide you with information regarding our company and the Services;
- Process any request or question you submit to us, including communicating with you regarding the processing of such a request or question;
- Process any transaction (business transaction) you conduct with us;
- To improve and develop the Services, in particular by communicating with you to obtain your feedback and by generating anonymized statistical data based on that feedback;

- To process the application you submit to us, whether it is an unsolicited application or one related to a job posting we have published;
- To communicate with you to follow up on your application, obtain additional information regarding your application, and/or inform you of any decision we have made regarding your application;
- To enable us to fulfill our obligations and exercise our rights as your employer or in any other capacity;
- To allow you to access our Digital Tools;
- To measure changes in the popularity of the various components of our Digital Tools;
- To identify the technology you use when accessing them (such as the operating system, browser, and device type and model) in order to assess compatibility and improve their overall accessibility;
- To identify the websites from which you access them and to evaluate the number of referrals received;
- To identify the country from which you wish to access our Digital Tools in order to verify whether access can be granted to you in accordance with applicable law.

Prior Consent for Use for Other Purposes. Subject to the exceptions provided for in the Privacy Act, we will ensure that we obtain your consent before using any personal information about you for purposes other than those listed above.

Authorization to Collect Personal Information for Profiling, Identification, or Location Purposes. Due to the use of certain Digital Markers (see the summary table attached as an appendix to this Policy), we may collect personal information using technology that includes features enabling us to identify you, locate you, and profile you. The features that allow us to collect your personal information for identification, location tracking, and profiling purposes are disabled by default. You can enable these features by giving your explicit consent, either by tapping the appropriate button in the pop-up window that appears when you access our Digital Tools.

4. To whom do we disclose your personal information?

Access to and disclosure of personal information. We may provide access to, or disclose, your personal information to the following individuals or entities:

- a. To employees and representatives of our organization and entities within the same corporate group who need access to this personal information to fulfill one or more of the purposes listed in Section 3 above;
- b. To insurers, wholesalers, and/or partners from whom you wish to obtain a quote or enter into a contract in connection with the provision of the Services, in particular to (i) enable the insurer, wholesaler, and/or partner to decide whether or not to accept the risk and (ii) if applicable, prepare the contract;
- c. To our external service providers and agents who need access to this personal information to fulfill their obligations under a service agreement or engagement with us (e.g., web hosting or cloud computing service providers), under which the relevant service provider or external agent is required to take appropriate measures to:
 - (i) ensure the confidentiality of the personal information disclosed;

- (ii) ensure that the personal information disclosed is used only for the purpose of fulfilling the obligations incumbent upon them under the service contract or engagement agreement;
 - (iii) ensure that the personal information disclosed is not retained after the termination of the service contract or engagement;
 - (iv) notify us immediately of any breach or attempted breach by any person of any obligation regarding the confidentiality of the personal information disclosed; and
 - (v) allow us to conduct any audit regarding the confidentiality of the personal information disclosed;
- d. To your former and current employers, as well as any institutions you may have attended, in order to verify the truthfulness, accuracy, and completeness of any information provided in connection with an application you have submitted to us, as well as to obtain additional information from these entities, if necessary;
 - e. To any other person or entity, when required or permitted by applicable law, or with your prior consent.

We may disclose your personal information to individuals or entities falling within the categories listed above that are located outside the province of Quebec. In such cases, we will conduct a risk assessment and implement mitigation measures as required. We will therefore only disclose your personal information if our assessment demonstrates that the person or entity in question is able to ensure adequate protection of said personal information in accordance with generally recognized privacy principles, among other criteria.

5. How do we protect your personal information?

Security Measures. We have adopted and implemented physical, technological, and administrative security measures designed to protect your personal information and minimize the risks of unauthorized and/or unlawful access, use, disclosure, and destruction. Here is a brief description of these security measures:

- **Employee and Partner Selection Process.** We follow a process that takes into account our obligations regarding the protection of personal information when recruiting new employees who will be required to process personal information or when entering into a service contract or engagement that involves the disclosure of personal information to a third party;
- **Confidentiality Commitments and Internal Policies.** All of our employees who are granted access to your personal information are required to comply with internal policies regarding the protection of personal information;
- **Training.** We make every effort to ensure that each of our employees who may access personal information receives training in privacy, personal information protection, and cybersecurity;
- **Access Management and Retention.** We ensure that your personal information is accessible only to those of our authorized employees and representatives who need access to it to perform their duties or duties related to the pursuit of one or more of the purposes identified in Section 3 of this Policy. To this end, we have implemented mechanisms to manage access to personal information, including the granting of distinct access rights based on an employee's position, as well as two-factor

authentication. Furthermore, we store your personal information on the secure servers of our web hosting or cloud service providers;

- **Retention and Destruction Policy.** We have adopted a records retention policy that complies with applicable legal, regulatory, and operational requirements. This policy takes into account the obligations of our industry, relevant professional recommendations, and the technical limitations of the systems used. It establishes the retention periods applicable to different types of records. We have also implemented a secure destruction procedure for paper documents obtained or held by the firm to ensure the protection of personal and confidential information.
- **Management of Privacy Incidents.** In the event of a privacy incident that poses a risk of serious harm to you, we will take the necessary steps to notify you, in accordance with the Act respecting the protection of personal information in the private sector. The assessment of the risk of serious harm to you is conducted by taking into account criteria such as the sensitivity of the personal information affected by the privacy incident, the anticipated consequences of its use, and the likelihood that it will be used for harmful purposes;
- **Complaint Handling Process.** We have developed and adopted a complaint handling process within our organization. You are invited to review this process, which is accessible via the following hyperlink: [Dispute Resolution Policy – Ellipse Insurance](#).

We reassess the aforementioned security measures on a regular basis.

Risk. No organization can validly claim to be immune to the risk of a privacy incident involving personal information. Despite all the efforts we make to ensure the protection of your personal information, we cannot guarantee that it is completely immune to the risk of a privacy incident. If you have reason to believe that the security of your personal information has been compromised, please contact us using the contact information provided in Section 8 of this Policy.

6. What are your rights regarding your personal information?

6.1 Right of Access

Scope. You have the right to access your personal information, which includes the following:

- The right to obtain confirmation or information regarding whether we collect, use, disclose, or retain personal information about you;
- The right to receive disclosure of the personal information we hold about you;
- The right to review the personal information we hold about you, including the right to view such personal information on-site during our normal business hours or remotely, and to obtain a copy of it; and
- The right to receive (or to request that it be provided to a third party), in a structured and commonly used technological format, the computerized personal information about you that we retain (excluding information created or inferred from personal information), unless exercising this right would impose serious practical difficulties on us.
- Subject to applicable legal provisions, access to certain personal information in your file may be restricted or denied under the circumstances provided for by law.

(Minimal) Fees. Exercising the right of access is free of charge. To the extent that you request us to reproduce, transcribe, or transmit personal information about you, we may require you to pay reasonable fees not exceeding the cost of reproduction, transcription, or transmission. An estimate of these fees will be provided to you prior to any reproduction, transcription, or transmission.

Applicable Procedure. Any request to exercise your right of access must be addressed to our Privacy Officer, whose contact information is provided in Section 8 of this Policy, in accordance with the procedure described in Section 6.4 of this Policy.

6.2 Right to Rectification

Scope. You have the right to rectify the personal information we hold about you, which may be exercised in the following circumstances:

- Personal information about you is inaccurate or out of date;
- Personal information about you is incomplete;
- Personal information about you is ambiguous; and/or
- The collection, disclosure, or retention of personal information about you is not legally authorized or justified.

Right to Rectification and Deletion. Each request is reviewed in accordance with applicable laws and our policy on the retention and destruction of personal information.

Applicable Procedure. Any request to exercise your right to correction must be addressed to our Privacy Officer, whose contact information is as set forth in Section 8 of this Policy, in accordance with the procedure described in Section 6.4 of this Policy.

6.3 Right to Withdraw Consent

Right to Withdraw Consent. You have the right to withdraw your consent to the disclosure or use of your personal information that we hold. In such a case, you will be informed of the consequences arising from or that may arise from such withdrawal before it takes effect, so that you may make an informed decision in this regard. By way of example only, we will not be able to provide the Services to you if you withdraw your consent for us to disclose your personal information to the insurers with whom we do business.

Applicable Procedure. Any request to exercise your right to withdraw consent must be addressed to our Privacy Officer, whose contact information is provided in Section 8 of this Policy, in accordance with the procedure described in Section 6.4 of this Policy.

6.4 Procedure

Admissibility of a Request. Any request to exercise a right set forth in Section 6 of this Policy must meet the following criteria to be admissible:

- a. The request must be made in writing; and
- b. The request must be addressed to our Privacy Officer, whose contact information is provided in Section 8 of this Policy.

Identity Verification. We must verify your identity before acting on any request to exercise a right set forth in Section 6 of this Policy.

Assistance. If your request to exercise a right set forth in Section 6 of this Policy is not sufficiently specific, or upon your request to that effect, we will assist you in identifying the personal information covered by your request.

Response Timeframe. We must respond in writing (either favorably or unfavorably) to any request to exercise a right set forth in Section 6 of this Policy within thirty (30) days of the date of receipt, subject to our ability to verify the identity of the person making the request.

7. How can you file a complaint regarding the processing of your personal information?

Right to File a Complaint. If you are dissatisfied with how our organization processes your personal information, you may file a complaint with our Privacy Officer, whose contact information is provided in Section 8 of this Policy. We invite you to review our complaint handling process, which is available via the following link: [Complaint Handling Policy – Ellipse Insurance](#).

8. Who can you contact regarding your personal information?

Contact Information for the Privacy Officer. To exercise any of your rights, ask questions, provide feedback, or file a complaint, please contact our Privacy Officer, whose contact information is as follows:

c/o Steve Martin, Senior Vice President
Privacy Officer
Ellipse Insurance Inc.
6405 Christophe-Pélissier Street
Trois-Rivières, QC G9A 5C9

Phone number: 1-800-567-1070
Email address: info@ellipse.ca

9. How may we update this Policy?

Amendment Process. The date of adoption and the date of the last update to this Policy are indicated in the header on its first page. This Policy may be amended to reflect changes in applicable legislation and in the policies and practices governing our governance and operations regarding the protection of personal information, among other things.

APPENDIX

Summary table of digital markers used on the Site (<https://ellipse.ca/>)

Digital Supplier	Marker Name	Stated purpose of the digital marker	Digital activity duration	Marker type
google.com	rc::a	This cookie is set by the Google reCAPTCHA service to identify bots and protect the website against malicious spam attacks.	Never expires	Necessary
google.com	rc::c	This cookie is set by the Google reCAPTCHA service to identify bots and protect the website against malicious spam attacks.	Session	Necessary
Amazon Pay	session-token	This cookie is set by Amazon Pay for processing payments via Amazon, in order to ensure transaction security.	Session	Necessary
CookieYes	cookieyes-*	CookieYes sets this cookie to manage the consent solution.	1 year	Necessary
pgen.pl / Precigen	darkMode	Precigen sets this cookie to remember the user's dark mode preference, ensuring the website retains the chosen color theme during subsequent visits, thereby enhancing personalization and the user experience.	Never expires	Functional
google.com	_ga	Google Analytics uses this cookie to calculate visitor, session, and campaign data and to track site usage for the site analytics report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.	1 year, 1 month, 4 days	Analytics

google.com	_ga_*	Google Analytics sets this cookie to record and count page views.	1 year, 1 month, 4 days	Analytics
google.com	_gid	Google Analytics uses this cookie to store information about how visitors use a website while creating a report on the site's performance. Some of the data collected includes the number of visitors, their source, and the pages they visit, all on an anonymous basis.	1 day	Analytics
google.com	_gat_gtag_UA_*	Google Analytics sets this cookie to store a unique user ID.	1 minute	Analytics
facebook.net	_fbp	Facebook sets this cookie to display advertisements when you are on Facebook or on a digital platform powered by Facebook advertising after visiting the website.	3 months	Advertisement
Spotify AB	__spdt	This cookie, placed by Spotify AB, is used to measure conversions from Spotify advertising campaigns.	1 year	Advertisement
googletagmanager.com	_gcl_au	Google Tag Manager places the cookie to test the advertising effectiveness of websites using its services.	3 month	Advertisement
doubleclick.net	test_cookie	doubleclick.net sets this cookie to determine whether the user's browser accepts cookies.	15 minutes	Advertisement
doubleclick.net	IDE	Google DoubleClick IDE cookies store information about how the user interacts with the website in order to display relevant ads based on their profile.	1 year 24 days	Advertisement