

RESPECTING YOUR PRIVACY

10 privacy principles

INTEGRITY & ACCOUNTABILITY

To us, they're not just the latest corporate buzzwords. Integrity and accountability are values that have guided our business practices since Empire Life Investments Inc. (Empire Life Investments) was founded in 2012.

We're in the business of providing financial investment solutions to Canadians and to help us fulfil our mission we are entrusted with a significant amount of personal and other types of information.



What types of information do we collect and use – and why?

In the course of doing business, we collect and use three types of information: **personal, non-personal and anonymous.**

Personal information identifies you specifically.

Some examples of personal information are: name, age, income, credit history, Social Insurance Number, home email, address and telephone number.

Non-personal information includes business names, titles, addresses and phone numbers.

At Empire Life Investments, we collect and use personal and non-personal information to deliver the financial investment products and services our clients and business partners ask for.

Empire Life Investments may use third party service providers located outside of Canada to process and store your personal information.

Anonymous information

In addition to personal and non-personal information, we also collect and use anonymous information. For example, we may conduct surveys to measure how well we are doing our job or we may use non-identifying demographic information from internal and external data sources to develop new products and services to respond to market needs. In addition, and for both of the reasons mentioned above, we regularly track anonymous traffic patterns through our websites. In all of these cases, we don't collect and use any identifying information about you unless you agree to provide it.

Our commitment to you

At Empire Life Investments, we have always been very sensitive to privacy issues and to the ongoing trust our clients, employees and business partners place in us. In respect of your privacy, everyone at Empire Life Investments follows 10 privacy principles. These principles set standards for how we handle your personal information.

1. Accountability

Under the guidance of our Chief Privacy Officer, we are responsible for maintaining and protecting the personal information we collect, use and disclose.

2. Identifying Purposes

We tell you why we need your personal information before or at the time we collect it.

3. Consent

We ask for and receive your consent to collect, use or disclose your personal information. The only exceptions would be in cases where use or disclosure is required or permitted by law. For example, a criminal investigation may constitute an exception.

4. Limiting Collection

We only collect information necessary for the purposes we identify to you, and only in a fair and lawful way.

5. Limiting use, disclosure and retention

We only use the information for the purpose we collect it for, and we destroy the information once it is no longer needed for that purpose.

6. Accuracy

We take steps to make sure your information is accurate, complete and up-to-date.

7. Safeguards

We protect the confidentiality of your personal information with secure storage and procedures, and provide access only to those individuals who need it for its intended purpose.

8. Openness

We make information openly available about our privacy policy and practices, through printed material, our websites and our Chief Privacy Officer.

9. Individual Access

We provide you with access to any personal information of yours we have, tell you how it is being used, stored and disclosed, and give you the opportunity to request that it be amended, if appropriate.

10. Challenging Compliance

We are always ready to answer your questions, enquiries or complaints about our privacy principles and practices, and your requests to access your personal information. Please contact our Chief Privacy Officer at:

Chief Privacy Officer

Empire Life Investments Inc.
165 University Ave., 9th Floor
Toronto, ON M5H 3B8
Toll-free: 1 855 823-6883
Facsimile: 1 800 920-5868
Email: privacy@empire.ca

Where can I find more information about the Empire Life Investments privacy policy and practices?

Our complete privacy policy and guidelines for personal information access requests are posted on our website at **www.empirelifeinvestments.ca**

If you would like further information, please contact us in writing or by phone or email, using the information listed above.



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Empire Life Investments Inc. is an investment management company exclusively focused on managing investment solutions for Canadians.

We are owned by The Empire Life Insurance Company, one of the top 10 life insurance companies in Canada*. The Empire Life Insurance Company has been managing investments for Canadians for 50 years.

*Source: Office of the Superintendent of Financial Institutions (OSFI), based on general and segregated fund assets

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