



Memorandum

To **All CGI - Insurance Information Services Valued Clients**
From **Kevin Carroll, Director & Privacy Officer**
Date **January 22, 2009**
Subject **The Personal Information Protection and Electronic Documents Act (PIPEDA)**

As the Privacy Officer for CGI Insurance Information Services, I would like to take this opportunity to inform you of the initiatives that we have taken and comment on certain aspects of the Privacy Legislation that took effect on January 1, 2004.

As the primary provider to your organization of personal information for insurance purposes, I would like to confirm that CGI takes its obligations to you our clients and consumers very seriously. I am also pleased to report that as a licensed consumer reporting agent, we have always taken the issue of privacy seriously. To ensure that we continue to meet (or exceed) these requirements we have undertaken the following steps;

1. We have worked closely with Insurance Bureau of Canada (IBC) to ensure that we have a consistent interpretation of PIPEDA's requirements.
2. We have sought legal advice to determine impact on CGI offerings and practices.
3. We have ensured that all our employees have been made aware of PIPEDA and its' requirements. Orientation meetings have been held and all staff will be obligated to sign a document outlining their roles and responsibilities regarding these new laws.

We would like to confirm CGI's commitment to ensure ongoing compliance.

In accordance with our contract with you, we trust that your organization will take the appropriate steps in accordance with industry guidelines to ensure your compliance as it relates the use of CGI services. These steps suggest the implementation of proper business practices to ensure that consent is received from your applicants/policyholders to access, use and exchange personal information.

Key requirements of the legislation

Consumer Consent Insurers, brokers and agents obtain consent from the consumer to collect, use, disclose and exchange personal information when accessing CGI databases.

CGI Security

CGI has taken the necessary steps to conform to the security and data protection provisions of the legislation.

Consumer Matters

For quite some time CGI has had a formal process in place to allow consumers to access personal information contained in our databases. We encourage your organization to direct consumers to our help desk to obtain any CGI report containing personal information which they may wish to review. Information reports provided to consumers, through the Help Desk, are provided at no cost should the information be 'on file'. Should there be costs associated with obtaining the information (such as MVR's) they will be provided at cost. For further information, please contact your CGI Account Representative.

CGI has identified "investigative officers" in each insurance company who are responsible for investigating and correcting any data errors as appropriate brought to our attention by consumers. If your company has not appointed an 'investigative officer', and would like to do so, please contact your Account Representative to make the necessary arrangements.

I trust that this document addresses any concerns or issues you may have, relative to privacy, but if you still have questions please call me and I will endeavour to address your concerns.

Yours sincerely,

Kevin Carroll
Director & Privacy Officer
CGI – Insurance Information Services