



Canada Life™

Data Protection

Canada Life carries out a continuing and comprehensive evaluation of its responsibilities as a data controller under the Data Protection Act 1998 (the Act) and takes every measure necessary to ensure compliance with the various provisions of the Act.

Each employee is required to comply with the Act and must ensure they are aware of their responsibilities in complying with the Act. Data protection has been incorporated into our documented procedures and training is provided to all staff.

Canada Life's privacy guidelines included in our Code of Business Conduct describe our commitment to privacy and explain the principles that guide employees in protecting the privacy and confidentiality of personal information. Employees only have access to information relevant to their business area.

All documents and data, whether paper or electronic, that are produced or received in the course of doing business are retained and disposed of in accordance with applicable Business practices and procedures.

In relation to all personal data (within the definition of the Act) which is held or may be held by us and whether supplied directly by an individual or passed to us through our relationship with the policyholder, Canada Life is a data controller either jointly or in common with the policyholder and/or their Financial Adviser. We do not consider ourselves to be the policyholder's data processor. It is therefore not appropriate for us to enter into a data processing agreement with a policyholder.

Under section 1 (1) of the Act it is provided that a data controller is a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner that any personal data is, or will be, processed.

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