

Data Destruction and Retention Policy

Effective Date: 17 May 2021

Omnia Adjusters Cooperative takes the protection of data privacy seriously. This policy outlines Omnia's approach to data destruction and retention in order to comply with federal and provincial standards of data privacy.

Data Retention

The data that Omnia collects will be retained by Omnia for the minimum period of time required, in accordance with one or more of the following considerations:

- The instructions of the client for whom Omnia has collected the data, as set out either in a contract or other written communication specifying data retention periods.
- Provincial limitation periods for claims or additional time beyond limitation periods as may be required to ensure the benefit of limitations are adequately upheld.
- The requirements of any on-going proceedings (e.g. litigation or management of structured settlements) for the duration of which the retention of the data remains necessary.
- Financial information will be retained for the period required by the Canada Revenue Agency of six years after the end of the fiscal year in which compensation was received. Files containing data whose retention period is shorter than the CRA-defined period will have all other data removed at the time of the expiration of that shorter retention period, except the accounting information.

Omnia will not retain any data for a period longer than that which is dictated by the above requirements.

Data Destruction Process

All data whose retention period has expired will be destroyed within 90 days after the expiry of that period. The following procedure will govern that process:

- At the end of each month files whose retention period has expired will be identified. A notification will be sent to the Omnia member(s) responsible for the relevant files identifying the files (i.e. Control adjuster/member firm assigned on the file) and requesting confirmation that Omnia may proceed with the destruction of those files.
- If there is no response from a member within 60 days or two calendar months (whichever elapses first) Omnia will assume there is no reason to keep the file and proceed with destruction.
- If the member sends notice that a file must be retained due to a change of circumstance (e.g. new or on-going legal proceedings involving the file), Omnia will adjust the destroy date in ac-

cordance with the data retention policy outlined above.

- At the end of each month Omnia will identify all files whose destroy dates have expired more than two calendar months prior and destroy those files.
- At the end of each fiscal year (July 31st), Omnia will identify all accounting records that were created more than 6 calendar years prior, and which have been retained for CRA record retention policy compliance purposes only, and destroy those records.
- To ensure that data that has been destroyed on the Omnia IT system is no longer on the personal or business electronic devices of the member companies or their employees, Omnia will send out a monthly reminder to Members to destroy unnecessary data on their devices. This reminder will include the following suggestions:
 - Empty Temporary and download folders on each computer.
 - Empty your Recycle Bin.
 - Destroy any information and hard-drives on computers and any other electronic devices that are being decommissioned before doing so. Physical destruction remains the most effective way.
 - Ensure that any data and information is removed from any personal devices if they should no longer have access to file information and disable access profiles for personnel no longer needing access to live systems.