

**Omnia Insurance Adjusters Cooperative
Privacy Policy
Effective Date: 17 May 2021**

This document is intended to provide a clear and accessible description of how Omnia handles private information in order to ensure that information is managed and protected in accordance with the standards of Canadian federal and provincial law.

What information do we collect and why do we collect?

Omnia provides primarily insurance adjusting services on behalf of third-party clients. These services may include investigation, negotiation, and settlement of insurance claims, as well as other forms of loss assessment and related support. Therefore Omnia collects the necessary information to perform these services on a case by case basis.

This information broadly includes, but is not limited to:

- Contact information for individuals (e.g. home address, telephone number, email).
- Other information for claims being handled by Omnia for the benefit of third-party clients.
- Corporate information, trade secrets, and information related to on-going litigation.

Omnia understands most of this information to be sensitive, meaning that there are potentially serious repercussions (personal, financial, or otherwise) in the event of a breach of data privacy.

Omnia is committed to collecting, using, and distributing data in a manner that meets or exceeds the standards required by Canadian federal and provincial law.

What do we use your data for?

As a cooperative of independent insurance adjusters, Omnia does not use the data it collects for any other purpose than distribution to third-party clients for whom it was collected.

In this way, Omnia acts as an intermediary in the process of data collection and itself neither owns nor uses any of the information it collects from individuals or businesses.

How is data collected and where is it stored?

Omnia collects data by both physical and electronic means and that data is stored in the secure office locations of its Members as well as on servers of the Omnia IT system.

How is it secured?

Due to the potentially sensitive nature of the data collected, Omnia takes the security and protection of client's data very seriously. Our system is designed applying both leading industry standards as well as some proprietary security measures that include high levels of encryption, physical server security and conservative access and password management.

Who has access to the data and who uses it?

The Omnia IT system functions according to a 5-tiered model of system access to ensure that data access is restricted only to those individuals who require it for the performance of the services that Omnia, its Members, or any independent contractors have been engaged to perform. The 5-tier model is arranged as follows:

- **Tier 1: The Client**
All Omnia clients are granted access to all of their own data in the system.
- **Tier 2: Omnia Oversight**
Omnia has access to all the data in the system for the purpose of administration, system management, and oversight at corporate level. Even at the Omnia corporate level access is granted to individuals only as needed.
- **Tier 3: Member Companies**
Member companies are necessarily granted access to all of the files and related information regarding which their company is contracted to perform services.
- **Tier 4: Member Company Employees**
Individual employees of member companies are granted access to files on a designated, need-to-know-basis, at the discretion of member company.
- **Tier 5: Third-party Providers**
Third-party service providers are granted access to specific information within files on a designated, need-to-know basis, limited to what data is strictly necessary for the performance of the service for which they were contracted.

Other than those mentioned in the above list, data is not shared with any other parties and is kept private unless Omnia is otherwise compelled by law.

When is the data disposed of?

Omnia retains a record of all the data contained in a file as long as is required in accordance with the varying legal or contractual requirements for the diverse types of claims it is contracted to handle. More information may be found in Omnia's Data Retention and Destruction Policy

Request for Access to Information

Any individual is legally entitled to access and request changes to their own personal information held by a business. Since Omnia collects, but does not own any individual data, requests for access to information sent to Omnia will be referred in a timely manner to the client who is in the possession of that information for handling. This is done in accordance with Omnia's Complaints, Inquiries, and Access to Information Policy