

PRIVACY POLICY

This is the privacy policy (“**Policy**”) of MERIT Contractors Association Saskatchewan Inc. and its affiliate companies, including New Horizon Construction Benefit Services Inc. (collectively referred to as “**MERIT**” in this Policy). MERIT is committed to protecting your right to privacy when you provide us with personal information.

This Policy sets out how we collect and manage personal information, whether that information is collected via one of our websites, including www.meritsask.com and www.constructionbenefits.ca (collectively, the “**Website**”) or otherwise, including through selling, providing and administering our products and services (together, the “**Services**”). In this Policy, the terms "you", "user" and "your" refer to a visitor of our Website or user of our Services and the terms “we”, “us” and “our” refer to MERIT.

Please read this Policy carefully. By submitting personal information to us or by otherwise using our Website or enrolling in any of our Services, you agree that you have read, understood and agree to be bound by this Policy and hereby consent to the collection, use and disclosure of your personal information in accordance with this Policy. If you do not agree with some or all of this Policy, please do not use the Website or our Services.

Collection of Personal Information

In this Policy, “**personal information**” means information about an identifiable individual, such as their name, personal contact details and other information about that individual that can be used to identify them. Personal information in Canada does not include information to enable an individual at a place of business to be contacted, such as their name, position name or title, business telephone number, business address or business email address.

The type of personal information we collect will vary depending on your interactions with us and the Services we provide to you, but may include the relevant person’s name, address, phone number, email address, gender, date of birth, social insurance number, driver’s license, occupation, income and other employment information, family and marital status, health, lifestyle and medical information, claims history, credit card information, bank account information or account information.

If you provide us with personal information about another person, such as your spouse or dependents, you represent and warrant to us that you have obtained their consent to provide us their personal information and, in the case of any children who are minors, the consent of their parent or guardian.

How We Collect Your Information

In the course of providing Services, both virtually and in-person, through our Website and in connection with our other business and organizational activities, we may collect your personal information. We will only collect personal information as permitted under the applicable federal and provincial privacy legislation.

We may collect information in a variety of ways, including where you:

- create an account on our Website;
- request us to provide you information about our company or any of our Services, such as a quote for benefits or insurance Services;
- submit an application for or enroll in one of our Services, provide us with your personal information, or updates to your personal information, in relation to our Services and when we provide those Services to you;

- participate in one of our online or in-person training courses;
- apply for our Education Bursary program;
- submit a claim in relation to your group benefits or insurance plan;
- submit an employment application to us;
- send us an inquiry through our Website or directly to our email;
- contact us by telephone; and
- provide feedback in an online survey.

In certain circumstances, we may obtain personal information about you from third parties. By way of example, we may:

- obtain information about your employment from your employer in order to provide you with our group benefits, insurance, education bursaries and training Services;
- exchange personal information with underwriters, agents, brokers and reinsurers as appropriate in relation to the benefits and insurance Services that we provide;
- obtain credit information about you from third parties such as other insurers or credit reporting agencies where that information is required or appropriate to the Services that we provide; and
- obtain other personal information about you from medical professionals, legal counsel, private investigators and other third parties when we are investigating, evaluating, and adjusting insurance and benefits claims.

We may also collect aggregate information which tells us about visitors to our Website and users of our Services, but not the identity of those visitors. For example, we may collect information about the date, time and duration of visits and which pages of our Website are most commonly accessed. We also collect information from your devices (including mobile devices) and applications you use to access and use our Website and Services, which may include the device identification number and type, browser information, location information, and connection information such as statistics on your page views, traffic to and from the Website, referral URL, ad data, your IP address, your browsing history, and your web log information. Some of this information is collected using cookies, pixels or other technologies, which are described in further detail in the “Cookies and similar technologies” section below.

The purpose of collecting this aggregate information is to help us administer and improve our Website. Data collected through our Website and Services on an anonymous and aggregated basis helps us measure interest in and use of our Website and Services. We reserve the right to provide our analyses based on such anonymous and aggregated data to third parties.

How We Use Your Information

Personal information collected by us is used only for the purposes described in this Policy, or for other purposes which are disclosed to you and to which you consent.

We generally use personal information for purposes related to managing and developing our business and operations, including to:

- establish and manage our business relationship with you, including to offer, provide you with information about, process your application and determine your eligibility for and provide our Services, including group benefits and insurance plans and both online, education bursaries and in-person training courses;
- verify your identity and the accuracy of your personal information with government agencies, industry associates, insurers and other brokers as appropriate;
- create and administer your account on our Website;
- perform credit checks and otherwise assess future risks of loss in connection with underwriting our benefits and insurance plans;
- administer your group benefits and insurance coverage, communicate with plan sponsors and your employer with respect to your coverage, process benefits and insurance claims and pay benefits;
- evaluate, investigate, adjust and administer any benefits and insurance claims and assess losses in the event of an insurance claim;
- communicate with you about our Website and Services, fulfill your requests, request feedback through online surveys, notify you of changes to these Services and where we have your consent, send newsletters, surveys, offers and promotional materials related to our Website and Services and for our other marketing purposes;
- provide, monitor, personalize and improve our Website and Services;
- manage and develop our business, including to bill and collect premiums, train employees and ensure the quality of our Services, process and respond to applications for employment, compile statistics, analyze business results, perform internal data management and analytics, perform administrative and record keeping activities and conduct marketing, underwriting and insurance industry research and modelling;
- protect our rights and the rights of other registered users;
- investigate security breaches, protect against, detect, investigate and prevent potentially fraudulent, unauthorized or illegal activities or cooperate with government and law enforcement authorities in connection with legal matters;
- aggregate and anonymize the personal information; and
- for other purposes related to our relationship, where you have provided your consent or as otherwise permitted or required by law.

How We Share Your Personal Information

We may disclose or share your personal information in the following circumstances:

- with third party service providers and partners that help us to provide our Website and Services, including to our third-party administrator (ICBA), underwriters, agents, brokers and insurance or

reinsurance companies, our training course instructors and our third party technology partners providing website hosting, data warehousing, data analysis, event logging and other information technology, customer service, payment processing, user analytics and email delivery and messaging;

- with your employer, benefit plan sponsor, underwriters, agents, brokers and insurance or reinsurance companies, administrators of government benefits or other benefits programs and your healthcare provider as reasonably necessary to administer your benefits and insurance plan;
- to third parties to verify your identity and provide you with Services (as appropriate), including insurers, agents, brokers, underwriters, credit reporting agencies, government agencies and educational and certification organizations;
- to government agencies, industry associates, insurers, underwriters and broking partners in order to comply with our general reporting obligations;
- to third parties involved in the processing, investigating and adjusting of benefits or insurance claims, including your employer, your healthcare providers, insurance or reinsurance companies, investigators, legal counsel and other experts and advisors;
- in connection with protecting our rights and property, including for security breach, loss or fraud prevention, investigation or mitigation purposes;
- if a law, regulation, search warrant, subpoena or court order legally requires or authorizes us to do so;
- with a third party, in the event of a change in ownership of all or a part of us through some form of merger, purchase, sale, lease or amalgamation or other form of business combination, provided that the parties are bound by appropriate agreements or obligations which require them to use or disclose your personal information in a manner consistent with the use and disclosure provisions of this Policy, unless you indicate otherwise;
- protecting the safety of a person or a group of persons; and
- other purposes identified in other sections of this Policy or when your personal information is collected, or where such disclosure as permitted or required by law.

Links

Our Website may contain links to the websites of other organizations which may be of interest to you. Similarly, you may be directed to the websites of other organizations to perform certain functions provided on our Website. Linked websites are operated by third parties who are responsible for their own privacy practices.

Articles on our Website may include embedded content (such as videos, images and articles). Embedded content from other websites behaves in the exact same way as if the visitor has visited the other website. These websites may collect data about you, use cookies, embed additional third-party tracking technology and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

We are not responsible for these websites or the manner in which they collect, use or disclose your personal information, so it is important to familiarize yourself with the privacy policies of these websites before providing your personal information to them.

Consent

It is important to us that we collect, use or disclose your personal information only where we have your consent to do so or as provided in this Policy. Depending on the sensitivity of the personal information, your consent may be express, implied or deemed. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you enroll in one of our Services, we will assume your consent to the collection, use and disclosure of your personal information for purposes related to your enrolment or for other purposes identified to you at the relevant time. Deemed consent is consent we assume in the event that you do not exercise an opt-out mechanism offered to you.

By submitting your personal information to us or enrolling in any Services, you consent to the collection, use and disclosure of your personal information in the manner described in this Policy. To the extent that we are required by applicable laws to obtain your explicit consent for the collection, use or disclosure of your personal information in accordance with this Policy, such consent will be requested at the appropriate time. Further, if we plan to use or disclose your personal information for a purpose not previously identified (either in this Policy or separately), we will advise you of that purpose before such use or disclosure. However, we may collect, use or disclose your personal information without your knowledge or consent where we are permitted or required to do so by applicable law or regulatory requirements.

You may change or withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting our Privacy Officer using the contact information set out below. In some circumstances, a change or withdrawal of consent may limit our ability to provide Services to you or your ability to access certain areas of our Website.

We assume, unless you advise us otherwise, that by receiving a copy of this Policy or by continuing to deal with us, you have consented to the collection, use and disclosure of your personal information as explained in this Policy.

Security

Our third-party administrator, the Independent Contractors and Business Association (ICBA) uses reasonable and appropriate measures, including encryption software, designed to help you secure your personal information against loss or accidental, unauthorized, or unlawful access, use or disclosure. Only our staff, the ICBA, applicable plan sponsors and service providers who have a legitimate business purpose for accessing the personal information collected by us are authorized to do so. Unauthorized use of personal information by anyone affiliated with MERIT is prohibited and constitutes grounds for disciplinary action.

Unfortunately, no data transmission over the Internet can be guaranteed as completely secure. While we strive to protect such information, we cannot ensure or warrant the security of any information transmitted to us and you do so at your own risk.

You are solely responsible for ensuring that you do not disclose your account access information to third parties. This includes but is not limited to not disclosing such information to anyone, ensuring that sufficient security software is installed and running on your device, that your network firewall is of sufficient quality and that your wireless connection is encrypted to a degree that will prevent third party access. We are not responsible for any failure by you to secure your own device and its access to the Internet or your use of public, unsecured networks. We are also not responsible for any failure by you to eliminate malware. These failures and others can make you vulnerable to privacy breaches and would put you and your data at risk.

Location of Personal Information

Personal information we collect is stored and processed by us primarily in Canada. However, we also use third party service providers, such as payment processors, insurance carriers and technology partners, that may use, process and store your personal information in another country. Personal information provided to third parties outside of Canada is subject to the laws of those jurisdictions and may not be afforded the same legal protections that are available in Canada. In those cases, we will put appropriate contractual and other controls in place to protect your personal information, as required by applicable laws.

By using the Website, enrolling for one of our Services or otherwise submitting your personal information to us, you hereby consent to the transmission, processing and/or storage of personal information outside of Canada.

Cookies and similar technologies

When you visit our Website or access our online Services, a cookie or similar technology may be stored on your device. A cookie is a small amount of data that is transferred to your browser by a web server and can only be read by the website that gave it to you. It functions as your identification card. It is not a program and cannot be executed as code or deliver viruses.

We may use cookies and other technology to help us track use of our Website and online Services by users, including casual visitors to our Website—such as the number and frequency of visits to our pages, which parts of our Website are visited and interaction with any advertising content. The Website also uses cookies to provide users with certain features and preference settings. This information provides us with constructive feedback about our Website so that we can identify the most effective areas and generally improve our Website on an ongoing basis.

Cookies can also customize the Website to your particular interests or store your personal information – like passwords or user IDs. If a website ever greets you with your name, chances are it's using a cookie to do so.

Most browsers are initially set to accept cookies. You may be able to configure your browser to restrict or block cookies. However if you disable cookies you may find this affects your ability to use certain parts of our Website or online Services. For example, while you can use the Website without cookies, you may have to re-enter information each time you visit. For more information about cookies and instructions on how to adjust your browser settings to accept, delete or reject cookies, see the www.allaboutcookies.org website.

When you visit our site, Google Analytics adds a cookie to distinguish you from other users, track your behaviour across our Website and gather information about users usage of the site. We use this information to improve the user experience of the Website. The cookie lasts for up to 2 years. More information about the Google Analytics cookie can be found in the [Google Analytics Privacy Policy](#). You can opt out of Google Analytics tracking by installing the Google Analytics Opt-Out Browser Add-on.

With your permission, the Website also uses the Conversion Tracking Pixel service of Facebook Inc. This tool allows us to follow the actions of users after they are redirected to a provider's website by clicking on a Facebook advertisement, which enables us to record the efficacy of Facebook advertisements for statistical and market research purposes. The collected data through the Conversion Tracking Pixel remains anonymous, which means we cannot see the personal information of any individual user.

However, the collected data is saved and processed by Facebook. Facebook is able to connect the data with your Facebook account and use the data for their own advertising purposes, in accordance with Facebook's Data Use Policy found under: <https://www.facebook.com/about/privacy/>. Facebook Conversion Tracking also allows Facebook and its partners to show you advertisements on and outside of Facebook. In addition, a cookie will be

saved to your computer for these purposes. More information about opting out of any remarketing pixels and technologies can be found at <http://networkadvertising.org/choices>

Direct Marketing

We are committed to complying with Canada's Anti-Spam Legislation. Where we have your consent or it is lawful to do so, we may provide you with direct marketing communications about our Services which may be of interest to you. Such information may be sent to you by post, email, telephone or SMS.

If you have consented to receiving marketing materials from us, you can withdraw your consent to receiving those communications at any time by:

- using the "unsubscribe" mechanism in our emails;
- if you have created an account on our Website, logging into your account and changing your contact preferences; or
- contacting our Privacy Officer using the contact information provided below.

Even if you opt-out of these marketing messages, we reserve the right to send you transactional or informational emails such as customer service communications in connection with the Services you have enrolled in or changes to our Website, your account or our policies.

Access to and Corrections of Your Information

You have the right to know what personal information we have about you and to correct any inaccuracies. If our Website allows you to create an account, your personal information is available when you log in to your account and you may correct this information at any time. Otherwise, please direct any such requests by email to info@meritsask.com.

Data Retention

We may retain your personal information as long as is necessary in order to manage our relationship with you (or fulfill the purposes for which it was collected) or as otherwise permitted by law. We will destroy personal information when it is no longer required for the purposes for which it was collected or as required by applicable law.

Changes to this Policy

We may update or modify this Policy at any time by posting our revised Policy to our Website. We include an "Effective Date" in this Policy displayed on our Website to identify when this Policy has last updated. We strongly encourage you to refer back to this Policy periodically to ensure that you stay up to date with our practices and procedures.

Contacting Us

If you have any questions or comments about this Policy, your information, our third-party disclosure practices or your consent choices, please contact our Privacy Officer at info@meritsask.com.

Effective Date: April 7, 2021