

Our Privacy Policy

Windsor Investigation Services has been providing investigation services to individuals, corporations and the insurance and risk management industry since 1994. We are committed to the highest ethical standards both as to the accuracy and careful treatment of personal information that comes into our possession as part of the services we render to our clients. Windsor Investigation Services gathers personal information only in connection with retainers received from clients and our staff have been trained to treat personal information carefully and with respect.

Why Windsor Investigation Services Collects and Discloses Personal Information

Windsor Investigation Services collects and discloses personal information to enable our instructing principals to satisfy themselves with respect to issues relevant to their personal or corporate needs. It also includes collecting and disclosing personal information about third parties with respect to claims made against these clients.

The Kinds of Personal Information Windsor Investigation Services Collects

The type of information Windsor Investigation Services collects depends upon the type and nature of the investigation required. This may include previous claims history, financial, medical health or employment information. We may seek validation information from retailers, wholesalers and suppliers of goods and services. In appropriate cases we may also seek information from authorities such as the Ministry of the Environment, Ministry of Labour, Office of the Fire Marshal, Police and Fire Services, Municipalities, Towns and Cities.

How Windsor Investigation Services Obtains Personal Information

In most cases, personal information is collected directly from the client or their agents or a third party making a claim against our principal.

Personal information may also be collected from involved parties such as public officials (Fire Department, Police, Office of the Fire Marshal) witnesses, other private investigators, credit bureaus, title searchers and the like. The organizations with which we deal are subject to their own privacy codes and we respect those codes.

In some cases, Windsor Investigation Services, or those we entrust with specific services, will infer such consent where appropriate. If an instructing principal tells Windsor Investigation Services that they have consent to collect information, we will rely on that instructing principal's advice. Consent may not be obtained with respect to the collection of certain publicly available information. If information is collected with respect to an investigation involving a suspected breach of contract (or other agreement) or breach of Canadian law, then consent may not be obtained.

Windsor Investigation Services' Disclosure of Personal Information

Windsor Investigation Services discloses personal information, including to its affiliated companies, only for the reasons listed above or if required to do so by law. The majority of information is disclosed or transferred solely to our instructing principals. However, in order to collect the information required by our principals, we may disclose personal information to third party service providers. This would include (and is not limited to) insurer's, insurance brokers, insurance adjusters, automobile repair companies, contractors, construction companies, investigators, engineers, accountants, lawyers, and others. We may also disclose personal information to authorities with jurisdiction such as Fire Departments, Fire Marshals, Police and other Federal, Provincial or Municipal authorities for the purposes of verifying the circumstances surrounding a breach of agreement or a breach of a law. We obtain consent to disclosure when required. Consent may also be inferred where appropriate. If an instructing principal advises us that they have their client's consent to disclose information, we will rely on our instructing principals advice.

Where Windsor Investigation Services discloses personal information to an approved investigative body (such as the Insurance Crime Prevention Bureau) or when we believe that the information relates to the breach of an insurance policy or other agreement or Canadian law, or where we are required by law to disclose the information, consent may not be obtained. Similarly, if personal information is disclosed to a lawyer for claims purposes or to obtain legal advice, consent may not be obtained.

How Windsor Investigation Services Ensures the Security of Personal Information

Personal information recorded in documents is securely stored at Windsor Investigation Services' offices. Electronically recorded information is stored on computer systems maintained by Windsor Investigation Services. These computer systems and the information stored in them are protected by electronic security systems.

Windsor Investigation Services restrict access to personal information and our employees, and representatives are under obligation to access personal information only when they have a legitimate business need to do so. Windsor Investigation Services employees receive training with respect to proper personal information handling practices and they are under obligation to comply with the privacy laws, this policy and related codes of conduct.

Windsor Investigation Services' compliance with appropriate personal information practices and privacy laws is overseen by and is the responsibility of our Privacy Officer.

Accuracy and Access to Personal Information

Windsor Investigation Services is committed to the accuracy and completeness of its personal information it uses or discloses to its instructing principals.

Upon written request and subject to the following (and any other reasonable conditions which may be necessary) we will provide reasonable access to personal information exclusively to the individual to whom it refers. We will not provide access in any of the following circumstances:

- If doing so would likely reveal personal information about a third party;
- If the information is subject to solicitor-client privilege;
- If revealing the information would reveal confidential commercial information;
- If revealing the information could affect the security of another person;
- If the information relates to the actual or suspected breach of an insurance policy or other agreement or the breach of a Canadian law, or;
- If the information was generated in the course of a formal dispute resolution process;
- Where Windsor Investigation Services is acting as agent another instructing principal where that principal has the responsibility to respond to access to personal information.

Amendments

Windsor Investigation Services may amend this policy from time to time at its discretion.

Request for further information, personal information access, or complaints about Windsor Investigation Services' handling of personal information should be referred to Windsor Investigation Services' Privacy Officer as follows:

**Windsor Investigation Services Ltd.
5060 Tecumseh Rd. E., Suite 1213
Windsor, Ontario, N8T 1C1
Attention: Privacy Officer
Telephone No.: (519) 966-0000
Toll-free: 1-800-580-9967**