

**Last Updated: September, 2025**

*We may make changes to this Privacy Statement from time to time. When we make changes to this Privacy Statement, we will change the "last updated" date at the top of this Privacy Statement. Your continued use of our services or website after any changes are made means that you agree to the new terms of the revised Privacy Statement.*

**Personal Information**

"Personal Information" means information about an identifiable individual, including any information about you or that can be used to identify you. The personal information that Toronto Police Widows and Orphans Fund ("TPWOF", "we", "us" or "our") collects includes your name, date of birth, gender, employment information (including your start date), leave status, contact information, and personal health information and we may also collect some of this same information about your spouse and children (collectively, "Personal Information"). Protecting the privacy and the confidentiality of Personal Information is of utmost importance to us. You can be confident that we are committed to protecting your privacy and handling your Personal Information in compliance with applicable laws.

**How We Collect Personal Information**

We collect Personal Information that is relevant to and consistent with the purposes of the collection as described in this Privacy Statement, identified at the time of collection or permitted by applicable laws. We collect Personal Information directly from you, verbally over the phone, when you submit applications and forms, when you contact us through our website and through other means of correspondence, and when you contact us by telephone, fax, mail or email. We may use cookies to automatically collect technical data about your equipment and browsing history when you use our website. We also collect Personal Information about you from third parties, including the Toronto Police Services in the course of our normal application, policy administration, claims handling and dues collection activities.

**We Will Obtain Your Consent**

We collect, use or disclose your Personal Information with your knowledge and consent, subject to applicable laws. Your consent may be express or it may be implied, depending on the sensitivity of the Personal Information, and you may give it to us verbally, electronically or in writing. You may withdraw your consent to collect, use or disclose your Personal Information at any time subject to legal and contractual restrictions and by providing us with reasonable notice. Withdrawals of consent cannot be retroactive. We will inform you if your withdrawal of consent has consequences, such as our not being able to provide you with products or services, not being able to administer or service your policy, or process claims.

**How We Use Personal Information**

We use your Personal Information for the following purposes:

- Verify your identity
- Process your application
- Underwrite your policies
- Determine your eligibility for products and services
- Market and promote our products and services
- Provide you with the full range of products and services you are eligible for

- Complete requested transactions
- Respond to requests, inquiries and complaints
- Communicate with you in a timely and efficient manner
- Detect and prevent fraud
- Provide, administer and protect our website
- Administer and service your policy and benefits
- Comply with regulatory, statutory, contractual, or other legal requirements
- Handle claims
- For other purposes that we have told you about and for which you have given us your consent, or as may be required to comply with applicable laws or governmental and regulatory authorities

We will only use or disclose Personal Information for the purposes for which it was collected, unless we have your consent to use it for a different purpose or if we are required to collect, use or disclose for other purposes required by applicable laws. If we want to use or disclose your Personal Information for a new purpose, we will advise you of this purpose in writing and obtain your consent.

Providing us with your Personal Information is always your choice. However, your decision to withdraw your consent or to withhold particular details may limit or prevent us from providing the products or services you have requested. The withholding of information may also impact our ability to administer your policy and process claims.

We store Personal Information in Canada, on-site in Toronto in our data centre and in the cloud.

## **Sharing Your Personal Information**

Your Personal Information is not shared with other organizations except as necessary when processing membership applications or if third party service providers are required to help us perform our obligations. We may share Personal Information with the parties set out below for the following purposes:

- Toronto Police Services in order to deduct dues and determine leave status.
- Your employer, to confirm your employment status, leave status and to administer dues collection.
- Third party service providers, as described in more detail below.
- Professional advisors, such as lawyers, auditors, actuaries, bankers, insurers and reinsurers who provide us with legal, accounting, auditing, banking, underwriting and insurance services.
- Providers of member satisfaction surveys.

Your Personal Information may be stored or processed by third parties in jurisdictions outside of Canada and therefore will be subject to the laws of those jurisdictions. Prior to entering into a definitive service contracting with any third party service provider, we enter into nondisclosure agreements with such third party service providers, which provide for confidentiality obligations that require the third party to protect and safeguard any Personal Information we provide to them.

In addition, we may disclose Personal Information as otherwise permitted or required by applicable law. The TPWOF requires all third parties to protect and safeguard the security of your Personal Information and to treat it in accordance with applicable legal requirements. We do this primarily by contractual means.

## **Disclosures to Other Third Parties**

The TPWOF will not disclose Personal Information about you to other third parties that may include your spouse, power of attorney, brokers and financial advisors, without current, written consent from you in a form acceptable to TPWOF.

## **Third Party Service Providers**

We may use third party service providers to perform specialized services on our behalf such as printing, research, marketing, analytics, mail distribution, application development, web hosting, system maintenance and administration or data processing. In particular, but without limiting any of the foregoing, our website uses Google Analytics. Our service providers may at times be responsible for processing or handling Personal Information. They are provided only the information necessary to perform the services. In addition, we require them to protect the information in a manner that is consistent with our privacy policies and security practices. TPWOF makes all third-party service providers aware of the importance of maintaining the privacy and security of Personal Information. All third-party service providers are required to enter into contractual agreements with us that prevent them from using your Personal Information for their own purposes and require them to use your Personal Information only for specific purposes in accordance with our instructions and all applicable legal requirements.

## **How We Protect Your Personal Information**

TPWOF makes all employees aware of the importance of maintaining the privacy and security of Personal Information. All TPWOF employees must comply with confidentiality and data security requirements as employees of TPWOF. We will take reasonable steps to protect Personal Information against loss, theft, snooping, hacking or unauthorized collection, use or disclosure. We use security safeguards appropriate to the sensitivity of the information. Our methods of protection include physical, administrative and technological safeguards, along with appropriate processes, to protect Personal Information from unauthorized access or use. While we are committed to protecting your Personal Information, our security practices and measures cannot guarantee absolute security of Personal Information and we cannot ensure or warrant the security of any information you provide to us. You can reduce risk to your own Personal Information by following best practices.

## **We Limit How Long We Keep Information**

We will keep your Personal Information only as long as it is necessary to achieve the purposes for which it was collected or for such longer period as may be required by applicable laws, our regulators or our insurers and reinsurers. We securely destroy Personal Information so that reconstruction is not reasonably possible to prevent unauthorized parties from gaining access to Personal Information.

## **Your Right to Access Your Personal Information**

You have the right to ask whether we hold any Personal Information about you and to have access to that information. You also have the right to know how we collected your Personal Information, how we are using it, and to whom it may have been disclosed. If you believe any of the Personal Information we have collected about you is incorrect or incomplete, you have the right to ask us to change it. If you show that your Personal Information is inaccurate or incomplete, we will make the necessary changes. Please contact our Chief Privacy Officer at [chiefprivacyofficer@tpwof.ca](mailto:chiefprivacyofficer@tpwof.ca).