

## **A Declaration of Client Privacy Rights – Putting the Client First**

- As professional insurance brokers, we at Corrigan Enterprises Ltd. o/a McElhoes & Duffy Insurance will continue to hold our client's personal information in strict confidence, and we shall not disclose any such information unless authorized by our clients, required by law to do so or required to do so in conducting negotiations with underwriters or insurers on behalf of the client. Our Privacy Code builds on this commitment.

### **Principle #1 Corrigan Enterprises Ltd. o/a McElhoes & Duffy Insurance is Accountable**

Corrigan Enterprises Ltd. o/a McElhoes & Duffy Insurance is accountable for all personal information in its possession or custody, including any personal information disclosed to third parties for processing or other administrative functions. Corrigan Enterprises Ltd. o/a McElhoes & Duffy Insurance has established policies and procedures to comply with this declaration, and has designated a privacy officer to be accountable for compliance.

### **Principle #2 Corrigan Enterprises Ltd. o/a McElhoes & Duffy Insurance will Identify Purposes**

Corrigan Enterprises Ltd. o/a McElhoes & Duffy Insurance will identify the purposes for which it collects personal information, before or when the information is collected.

### **Principle #3 Corrigan Enterprises Ltd. o/a McElhoes & Duffy Insurance will Get The Clients Consent**

Corrigan Enterprises Ltd. o/a McElhoes & Duffy Insurance will make a reasonable effort to make sure customers understand how their personal information will be used by the brokerage and insurers. Corrigan Enterprises Ltd. o/a McElhoes & Duffy Insurance will obtain consent from its customers before or when it collects or uses the personal information.

A customer's consent can be expressed, implied, or given through an authorized representative. A customer can withdraw consent at any time, with certain exceptions.

### **Principle #4 Corrigan Enterprises Ltd. o/a McElhoes & Duffy Insurance Limits The Collection of Personal Information**

Corrigan Enterprises Ltd. o/a McElhoes & Duffy Insurance limits the amount and type of personal information it collects. Each broker will collect personal information for the purposes identified to the customer. Corrigan Enterprises Ltd. o/a McElhoes & Duffy Insurance collects personal information using policies and procedures which are fair and lawful.

### **Principle #5 Corrigan Enterprises Ltd. o/a McElhoes & Duffy Insurance Limits the Use, Disclosure and Retention of Personal Information**

Corrigan Enterprises Ltd. o/a McElhoes & Duffy Insurance will use or disclose personal information only for the reasons it was collected, unless a customer gives consent to use or disclose it for another reason, or it is permitted or required by law.

Under certain exceptional circumstances, Corrigan Enterprises Ltd. o/a McElhoes & Duffy Insurance may have a legal duty or right to disclose personal information without the customer's knowledge or consent to protect the interests of insurers or the public interest.

Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance will keep personal information only as long as necessary for the identified purposes for which it was collected.

**Principle #6 Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance will Keep Personal Information Accurate**

Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance will keep personal information as accurate, complete and current as necessary for the identified purposes for which it was collected.

Customers may, in writing, challenge the accuracy and completeness of their personal information and request that it be amended as appropriate.

**Principle #7 Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance Safeguards Client Information**

Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance protects personal information with safeguards appropriate to the sensitivity of the information.

**Principle #8 Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance makes its Information Policies Available to its Clients**

Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance is open about the policies and procedures it uses to manage personal information. Customers have access to information about these policies and procedures. This information will be made available in a manner that is generally easy to understand.

**Principle #9 Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance makes Personal Information Accessible**

When customers make a request in writing, (Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance will within a reasonable time tell them what personal information it has, what it is being used for, and to whom it has been disclosed.

When customers request it in writing, Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance will give them access to their personal information. Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance will respond to the written request in a timely fashion. In certain situations, however, Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance may not be able to give customers access to all their personal information. Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance will explain the reasons for this lack of access and any recourse the customer may have, except where prohibited by law.

**Principle #10 Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance is Committed to Addressing Client Complaints and Concerns**

Customers may challenge Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance's compliance with this declaration. Corrigal Enterprises Ltd. o/a McElhoes & Duffy Insurance has policies and procedures to receive, investigate, and respond to customers' complaints and questions. Customers may learn about these policies and procedures by contacting Steve Corrigal, the brokerage privacy officer, at 233-1418.