

Privacy Policy

(Effective Date: January 1, 2026)

Introduction

We understand that appropriate and effective data management controls are integral to our business, and to our customers' trust. You can rest assured that we'll protect and respect your personal information and privacy. This Privacy Policy sets out how we collect, use and disclose your personal information and the steps we take to keep it safe.

Protecting your privacy

KEWA Financial Inc. is part of a group of companies operating to provide you with insurance services across Canada and the United States of America. This group of companies includes Indemnity National Insurance Company. KEWA and its member companies shall hereinafter be referred to as "KEWA", "we" or "us".

This Privacy Policy applies to your interactions with us when you purchase and use our products and services, when you apply for a job with us, and to your use of our websites located at [www.kewafinancial.com and www.indemnitynational.com].

"Personal information" means any information about an identifiable individual and includes his or her name, address, home telephone number, marital status, work history, liabilities, assets, income, banking records, health records, claims history and other information of a personal nature.

The personal information we collect, and how we collect it

We only collect your personal information with your consent, or where the law allows us to collect it without consent.

Consent can be implied by your actions (such as when you request products or services from us and provide personal information, when you seek additional products or policy / bond renewals, or when you continue using our products or services without objection following the opportunity to review this Privacy Policy) or it may be express (such as when you check a box, or sign a document to indicate your agreement; express consent may be oral, in writing or electronic). In some cases, your consent may be given by your authorized representative (such as your lawyer, broker, a legal guardian or a person having a power of attorney).

When we handle sensitive personal information, we obtain express consent. Sensitive personal information includes health and financial data, ethnic and racial origins, political opinions, genetic and biometric data, an individual's sex life or sexual orientation, and religious or philosophical beliefs.

In certain circumstances, as permitted or required by law, we may collect, use or disclose personal information without the knowledge or consent of the individual, such as when the personal information is publicly available as defined by regulation, where collection or use is clearly in the interests of the individual and consent cannot be obtained in a timely way, to investigate a breach of an agreement or a contravention of a law, to act in response to an emergency that threatens the life, health or security of an individual, for debt collection or to comply with a subpoena, warrant or court order.

By providing information about another person, such as a family member, director, officer, or employees, you represent that you have obtained that person's consent to the collection, use and disclosure in accordance with this policy.

We collect your personal information from you directly, such as when you complete a form, contact us, provide your information to purchase a product or service, or use our web page. We may also collect certain information indirectly from third parties, such as through insurance brokers, other insurers, banks, applications, transactions, consumer reports, or other legitimate means.

The types of personal information we collect will depend on the type of insurance being provided, but may include:

- Contact information for all insured persons including name, address, home and work phone numbers, fax numbers, email address and cellphone number;
- Birth date, age, gender, marital status and family status;
- Telephone calls and other communications. We may record telephone calls and other communications. We will inform you if the communication is being recorded. Calls and other communications may be recorded to ensure quality customer service, confirm our discussions and your instructions, resolve complaints, and train our staff. If you do not want your communications recorded, you can do business with us by visiting one of our offices in person, or by writing to us.
- Your driver's license information and the driver's license information of every person who operates the vehicles you are insuring including driver's license number, driving record including collisions, license suspensions, convictions, traffic violations, the class of license held, restriction on the driver's license, and safe driver or business rating information;
- Vehicle information;
- Financial information including banking information, credit card information, payment history, and credit rating;
- Property information (i.e. property values, mortgage or leasing information, etc.);
- Prior claim history and any information needed to adjust those prior claims (i.e. witness statements, damage estimates, claim file investigations, etc.);
- Information about you or the property you are insuring from underwriting tracking systems and other insurance companies;
- Commercial driving records and logs required to be completed by law, inspection outcomes relating to Carrier Audits for the National Safety Code Certificates, driver and vehicle list, claim history, safety violations, etc.
- Any information needed to adjust an insurance claim (e.g. reports from law enforcement, witness statements, damage estimates, claim file investigations, property valuations, etc.);
- Information about your transactions with us and products and services you use.

- IP addresses, if you visit our website. If you communicate with us electronically, our sites collect aggregated site-visitation statistics using cookies (small text files containing a unique identification number that identifies your browser to our computer); and
- Cookie information. Cookies tell us which web pages were visited, by how many people, the average time spent on a page and other useful information relating to our web site to help us enhance our customer experience.

There are 2 types of cookies:

- Session cookies are used only for the length of time you stay on the website. When you leave the website, they expire and are no longer active. We use session cookies to enable us to better serve you when you visit our website.
- Persistent cookies are more permanent and can be re-read when you return to the website that placed them on your computer. We use persistent cookies from time to time to prevent one-time events from occurring during subsequent user visits. This often applies to message or survey pop-ups.

We may also use cookies for internal web reporting and statistics. This information is gathered at an aggregate level and no individual user or computer would be identified.

Except as outlined above, we do not and will not use cookies to retrieve data from your hard drive (including email address information or other personal information).

You can choose not to accept cookies. You may do this by setting your browser options to inform you when cookies are being sent. Alternatively, you can set these options to deny cookies altogether.

Note: By not accepting cookies you may limit the functionality that we can provide to you when you visit our website.

You may choose to withhold or withdraw consent; however, this may affect our ability to provide you with the services or products you have requested. Where the withdrawal or withholding of consent prevents us from providing adequate customer service, we may be unable to process your claim for payment or may cancel an existing policy.

If you apply for a job with us, we may also collect the following:

- Recruitment information:
 - Personal contact information such as your name, phone number, email address, and mailing address;
 - Demographic information (with your consent);
 - Education information, such as current or past schools attended; and
 - Other information may be relevant to the job application.
- Assessment information:
 - Education background such as schools attended and degrees obtained;
 - Internship and/or work history; and

- Other information provided by you or collected during the interview process, including feedback from interviews.
- Hiring information:
 - Citizenship information (unless prohibited by law);
 - Government-issued identity numbers;
 - Results of background checks, which include identity verification, education history, work history, and criminal history, to the extent such checks are permitted by law;
 - For certain positions such as those involving finance, financial credit checks, to the extent such checks are permitted by law; and
 - Contact information for work references that you have identified, and feedback from those references regarding your work history and performance, to the extent such checks are permitted in the relevant jurisdiction. for a job with us, we may also collect:

This information is collectively referred to as Career Data.

We generally collect Career Data directly from you, such as when you provide your information at conferences, events, or through our online forms, or by submitting a job application or resume to us.

We may also collect certain Career Data from third parties (for example, public sources and social media such as LinkedIn; KEWA employees who may have provided your information with your consent; third parties such as conference organizers with whom you have shared your information knowing that it will be shared with KEWA; references you provide; and third parties who provide recruitment and background checking services to us).

How we use your personal information

Our typical use of personal information encompasses several purposes, such as:

- verifying your identity;
- confirming your application information and to understand and assess your insurance needs;
- evaluating insurance / surety applications and issuing policies and bonds;
- making underwriting and business decisions;
- providing you the insurance coverage and benefits you are entitled to;
- obtaining reinsurance coverage
- conducting surveys and internal business analysis, gathering broad demographic information, compiling statistics and developing products and services;
- responding to inquiries, questions and concerns and communicating with our clients
- conducting business audits;
- assessing, investigating, processing, or defending claims against our insureds,
- conducting litigation that arises out of our business including collecting a debt or enforcing an obligation owed to us by you;
- detecting and preventing and investigating illegal activities like fraud or money laundering;
- fulfilling legal or regulatory obligations, including those related to sanctions, anti-terrorism, and internal security policies and procedures; and

- managing our business environment, such as improving our business processes and business systems, including our IT systems.

We will always clarify to our clients why we need their personal information and will strictly limit its use to the identified purposes.

At this time, we do not use personal information for marketing purposes, automated decision making, or profiling.

If you are a job applicant, we may use your Career Data consistent with applicable laws for recruitment, assessment, hiring, and to comply with record keeping and reporting requirements.

We protect your personal information by:

- Limiting employee access to your personal information. Only employees who need to know your information to do their job are allowed to access your personal information.
- Maintaining physical, electronic and procedural safeguards to keep your personal information and/or personal health information safe and confidential.
- Requiring our employees to sign a Confidentiality Agreement to protect and hold your personal information in confidence.
- Restricting access and disclosure to third parties. If we share your information with a third-party service provider, we give them the least amount of information needed to provide the service we require. We restrict their ability to use the information for any other purpose, and we require these individuals to hold your information confidence and keep it safe and secure.

How we share your personal information

Personal information is shared between various departments within KEWA, its member companies, and with our business partners (i.e. brokers, license issuers, lawyers, reinsurers, auditors, process servers, financial consultants, and other technical experts) for business purposes.

Disclosing your information

When you submit an application for insurance or bonds through your broker or apply online, you are applying for insurance or bonds with all member companies with KEWA. The consent you provide allows your broker to disclose your information to us, and provides KEWA with permission to disclose your information to:

- Your broker or agent;
- All member companies of KEWA;
- Insurance tracking or reporting agencies used by KEWA;
- Reinsurers
- Sanctions checking services; and
- To obtain a credit score for rating purposes.

When you make changes to your policy or surety bond or when your policy or surety bond automatically renews, you are agreeing that any consent you have previously provided to us relative to your policy remains in effect unless the consent is otherwise explicitly withdrawn.

We may also use and disclose personal information to parties connected with the proposed or actual financing, insuring, sale or other disposal of all or part of our business or assets, for purposes connected to evaluating and performing the transaction. These purposes may include determining whether to proceed with the transaction or business relationship, or fulfilling any records or other reporting requirements to those parties.

Please note KEWA may release de-identified personal information to other businesses to facilitate our business needs.

Transferring your personal information

We may also transfer your personal information to service providers, including our affiliates hired to administer or provide products, services or information on our behalf. We require our service providers (i.e. independent adjusters, lawyers, accountants, experts, etc.), to use your personal information only as necessary to perform the services we have hired them to provide. On occasion, we may use service providers that process personal information in countries that do not offer the same legal protections for personal information as Canada or the United States of America, as applicable. In such cases, we will ensure that appropriate contractual protections are in place, as required by applicable laws.

Retention and destruction of information

Information will be retained and destroyed in a secure and confidential manner in accordance with our data retention schedule. Please note that we may retain your personal information past the end of your relationship with us, as we may be required to do so for legal, business, or regulatory reasons.

Your rights

Withdrawing your consent

Subject to certain legal and contractual restrictions and reasonable notice, at any time during or prior to receiving a service from us, you may refuse to provide information to KEWA or withdraw your consent for KEWA to collect, use or disclose your personal information and/or personal health information. You may also opt out of certain communications we may send you regarding other products and services. KEWA will seek to continue to provide you services, but any withdrawal of consent may affect our ability to respond to your insurance needs.

Accessing and/or correcting your information

Subject to exclusions in privacy laws, you have a right to access the personal information we have collected about you. You may also request amendments to any information on your file that you feel is incorrect, and in certain cases, you may request that we delete your personal information. To ensure we have accurate information, please notify us when there are changes to your personal information.

Contact information

If you want to:

- Access your personal information or make a request to have your information corrected;
- Change your consent with respect to how we collect, use or disclose your personal information;
- File a complaint about our privacy policies or the manner in which we've handled your personal information; or
- Inquire about any other privacy questions or concerns.

Please contact:

Privacy Officer

Daniel Waxman, Senior V.P. & General Counsel KEWA Financial Inc.

privacy@kewafinancial.com

Changes to This Policy

This privacy policy is effective as of the Effective Date at the top of this Policy. KEWA reserves the right to change this privacy policy at any time. We will take reasonable steps to advise you of any changes to this privacy policy, including by posting the revised policy on our website. We recommend that you review this privacy policy from time to time to obtain the current version. You may contact us at the address, email address or telephone number above to obtain a current copy of this privacy policy.