

ACCESS TO PERSONAL INFORMATION POLICY

St. Paul Fire and Marine Insurance Company and Travelers Guarantee Company of Canada ("Travelers Canada") understand the importance of protecting the privacy of clients and place a high priority on effectively dealing with any privacy related requests. This Access to Personal Information Policy addresses how Travelers Canada will meet its obligations under our Privacy Policy and the law with respect to permitting access to personal information. All privacy related access requests will be treated seriously, dealt with promptly and handled in a confidential manner.

This procedure will apply to a client seeking access to review his or her own personal information. This procedure also applies to others, including law enforcement authorities, seeking to access information on a client.

To make an access request, the following procedure may be followed, or as appropriate, will apply:

The Applicant must contact the Privacy Officer for Travelers Canada in writing and request access to the personal information. The request for access will be retained and recorded by the Privacy Officer. The Privacy Officer will send an acknowledgement by letter to the Applicant of receipt of the request stating the date of receipt, within 15 days following the date of receipt of the access request, and confirm that the access request is being processed.

The Privacy Officer will determine if the request for access is legitimate and not frivolous or vexatious. The Privacy Officer may require further information to allow him or her to make this determination. If the Privacy Officer determines that the request for access is not legitimate, or the Applicant is not authorized to make the request, he or she will:

- a) decline to permit access to the file;
- b) document why;
- c) state the reason for declining access in the file; and
- d) inform the Applicant in writing, as to the reason for declining access.

In permitting access to personal information, the Privacy Officer will first examine the file to make a copy of the contents to be disclosed. Travelers Canada may charge a reasonable fee to comply with an access request as permitted by law.

The Privacy Officer shall not disclose any information that:

- a) identifies third parties unless, on the face of the document containing the information, there is a consent by the third party to the release or his/her name in connection with the information in question; or
- b) falls within an exception to disclosure indicated in the Travelers Canada's Privacy Policy or by applicable law.

Access to personal information may take place in one of two ways:

- a) in person; or
- b) by mail or fax.

If an "in person" access is requested, the Privacy Officer will schedule an appointment during regular business hours. The appointment will be scheduled as soon as is reasonable.

"In person" access will be done in the presence of the Privacy Officer or a person designated by the Privacy Officer and the following rules will apply to the Applicant:

- i) you may only access your own file;

- ii) you may take notes on the contents of your file;
- iii) you may request the Privacy Officer to make copies of documents to be released;
- iv) you may not remove any of the contents of your file;
- v) you must confirm the completion of your inspection in writing, and the date and time of your inspection;
- vi) you may submit written comments concerning any information you deem inappropriate or inaccurate, for insertion in your file. Comments may be submitted at the time of inspection or at a later time; and
- vii) in the event the Privacy Officer determines that the record of your Personal Information is inaccurate or incomplete, he or she shall correct the information and make a notation in the file as to the date and nature of the correction.

If an "in person" access is not chosen, the following rules will apply to the Applicant and the Privacy Officer will:

- i) you may only access your own file;
- ii) you may take notes on the contents of your file;
- iii) you may request the Privacy Officer to make copies of documents to be released;
- iv) you may not remove any of the contents of your file;
- v) you must confirm the completion of your inspection in writing, and the date and time of your inspection;
- vi) make copies of documents that will be released;
- vii) mail or, if requested, fax or electronically transmit copies of the documents to be released; and
- viii) insert a note in the file listing the documents transmitted indicating the date and method of transmission of documents and the place of inspection.

The Applicant may then submit written comments to the Privacy Officer, concerning any information he or she considers inaccurate or incomplete for insertion in the file. The Privacy Officer will place these comments in the file.

Privacy Policy/Access to Personal Information Policy: July 20th, 2007.