

PRIVACY POLICY

The nature of our business requires a relationship of trust with our clients. In order to provide client's with the right products, fair adjustment and claim settlement, the requisite level of service, and to ensure we make informed underwriting decisions, it is necessary that we obtain information about our clients and/or their businesses.

The information with which we are entrusted is sometimes of a personal nature. Our clients have a right to expect that any Personal Information that they provide to us or that we obtain from other sources in order to make underwriting or business decisions will be kept in the strictest confidence and that access to Personal Information will be restricted to those having a legitimate need to review or use that information.

Personal Information: Personal Information is information about an identifiable individual or information that permits the identification of the individual. St. Paul Fire and Marine Insurance Company and Travelers Guarantee Company of Canada ("Travelers Canada") may also collect aggregated data, which is data from which the identity of an individual cannot be determined. Since it is not Personal Information, Travelers Guarantee may use aggregated data in any way that it considers appropriate.

Personal Information includes 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 type of Personal Information Travelers Canada collects about an individual is dependent upon the type of product that the individual requires from Travelers Guarantee. We will restrict the Personal Information we collect from each client to the minimum required to make underwriting and business decisions.

How We Collect Personal Information: We may obtain Personal Information directly from the client and through insurance brokers, retailers, other insurers, banks, credit bureaus, applications, transactions, consumer reports or by other lawful means.

How We Use Personal Information: Travelers Canada uses Personal Information to make underwriting decisions, for bond or policy management (which shall include all extensions, renewals, substitutions and modifications of a bond or policy), to maintain warranty records, protect against fraud, claims administration, to investigate and pay claims and for recovering loss payments or expenses that an individual may be liable to reimburse to Travelers Canada, and to comply with federal and provincial legal requirements.

Travelers Canada may review and analyze your use of products and/or related products and services and may communicate with you for the purposes of marketing other Travelers Canada products or related insurance products and services that may be of interest and benefit to you, and may help us serve you better.

We will explain to an individual to what use his or her Personal Information will be put before or when we collect such information. We will restrict our use of the Personal Information to the purposes identified to the individual or as permitted or required by law.

Consent: Your provision of Personal Information to Travelers Canada means that you agree and consent to the collection, use and disclosure of your Personal Information for such purposes as indicated to you as well as the purposes set out in this Policy Statement and in accordance with the practices described in this Policy Statement. Your provision of Personal Information about other individuals (e.g. family members, employees) means that you represent to Travelers Canada that those persons have consented to the collection, use and disclosure of their Personal Information for the purposes of underwriting, bond or policy management and claims administration in accordance with the practices described in this Policy Statement.

Withdrawal of Consent: If an individual refuses to consent to the collection, use or disclosure of his or her Personal Information, Travelers Canada may be unable to provide the product or service requested.

Subject to certain limitations, you may withdraw consent to the use of your Personal Information. Once a bond or a policy is issued or renewed, you may not withdraw your consent to use or disclosure of information related to your application or renewal, updating of credit information with the credit bureau, the administration of your bond or policy or the processing of any claims.

You may withdraw your consent to the collection, use and disclosure of your Personal Information for purposes not related to the delivery of the Travelers Canada products and services, including the receipt of marketing information and materials from Travelers Guarantee. If you wish to withdraw your consent for other purposes, please send your request to withdraw your consent in writing, including your full name and address to the Chief Privacy Officer for Travelers Canada at the address noted below.

Protection of Personal Information: Travelers Canada endeavours to maintain adequate physical, procedural and technical security with respect to its offices and information storage facilities so as to prevent any loss, misuse, unauthorized access, disclosure, or modification of the Personal Information entrusted to us by our clients and others. Travelers Canada only allows access to an individual's Personal Information to those employees who need to use it in their work. Travelers Canada's employees who have access to Personal Information are made aware of the responsibility they have for protecting that Personal Information and are required to make proper use of the manual and electronic controls available to them for that purpose. Our employees are subject to disciplinary procedures for the unauthorized use or disclosure of an individual's Personal Information.

Disclosure of Personal Information: Given the type of the products and services that

Travelers Canada provides in the normal course of business, it is sometimes necessary to provide an individual's Personal Information to a third party, such as a broker, reinsurer, legal counsel, regulator, adjuster, repairer or administrator. We will only disclose an individual's Personal Information with the individual's consent, except where to do so would cause undue delay in providing requested services or where Travelers Guarantee is legally required to disclose the information. When it is necessary to provide an individual's Personal Information to a third party, Travelers Canada provides only the information necessary for the third party to provide the service. Travelers Canada advises each third party to whom it provides an individual's Personal Information that Travelers Canada expects that it will comply with the Canada's privacy laws, and have the manual and/or electronic controls in place to protect that Personal Information.

Travelers Canada may disclose your Personal Information to individuals or organizations who are our advisers or service providers; and individuals or organizations who are, or may be, involved in (i) a transfer of all or part of the assets or business of Travelers Canada; or (ii) maintaining, reviewing and developing our business systems, procedures and infrastructure including testing or upgrading our computer systems.

Where Travelers Canada discloses Personal Information to organizations that perform services on its behalf, Travelers Canada will require those service providers to use such information solely for the purposes of providing services to Travelers Canada, our clients or the person concerned and to have appropriate safeguards for the protection of that Personal Information.

Retention of Personal Information: Travelers Canada will only retain an individual's Personal Information for as long as is necessary to fulfill the purposes for which it was collected or as required by law. Currently, the principal places in Canada where Travelers Guarantee holds Personal Information is in the Cities of Toronto, Halifax, Montreal, Winnipeg, Edmonton, Calgary and Vancouver and nearby municipalities where off-site storage facilities may be located. Information held in databases and e-mail received or generated by Travelers Guarantee may be maintained and stored at data centers in the United States. Information held outside of Canada is subject to the laws of the jurisdiction where it is maintained and stored.

Accessing Your Personal Information: An individual may access and rectify his or her Personal Information subject to any legal restrictions. For example, if to allow access would reveal Personal Information about a third party then access may be limited or denied. If there are reasons why access is denied, the individual will be advised of those reasons in writing. When an individual demonstrates that any information held is inaccurate or incomplete, Travelers Canada will make the appropriate changes to that information. An individual may access his or her Personal Information by referring to the Access Policy on the Privacy link on the website at www.Travelerscanada.com.

If you have any concerns regarding Personal Information that Travelers Canada maintains, or if you have concerns or dispute the manner in which Travelers Canada has dealt with your Personal Information, a privacy complaint should be set out in

writing, with as much detail as possible, and forwarded to the Chief Privacy Officer at the following address:

Chief Privacy Officer
Travelers Canada
20 Queen Street West, Suite 300
P.O. Box 6
Toronto, Ontario
M5H 3R3
Or Call: (800) 330-5033 or (416) 360-8183
Or Fax: (416) 360-8267

Receipt of the privacy complaint will be acknowledged in writing by the Chief Privacy Officer. If the Chief Privacy Officer is unable to resolve the complaint within 30 days of receipt of the written complaint, the Chief Privacy Officer will provide you with contact information for the appropriate Privacy Commissioner in Alberta, British Columbia and Quebec. If you live in a province other than Alberta, British Columbia and Quebec, you may contact the Privacy Commissioner of Canada by writing to:

The Privacy Commissioner of Canada
Place de Ville
Tower B, 3rd Floor
112 Kent Street
Ottawa, Ontario
K1A 1H3
Or
Call: (800) 282-1376
Or
Fax: (613) 947-6850