



Online Privacy Statement

Revised November 16, 2021

St. Paul Fire and Marine Insurance Company (Canada Branch), Travelers Insurance Company of Canada, and The Dominion of Canada General Insurance Company (collectively, "Travelers Canada") are committed to protecting the privacy and confidentiality of your Personal Information.

This Online Privacy Statement will inform you about how we use and disclose information that we and our service providers collect from your visits to travelerscanada.ca and other websites owned or operated by us (the "Websites"), through the software applications made available by us for use on or through computers and mobile devices (the "Apps"), through use of social media pages that we control ("Social Media Pages"), and through email messages that we send to you (collectively, including the Websites, the Apps, and our Social Media Pages, the "Services").

This Online Privacy Statement only applies to information collected through the Services. If you have purchased or applied for an insurance product from us, please also see our [Privacy Policy](#), which applies to the information that we collect about policyholders and applicants, through the Services as well as any other medium.

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Personal Information

- “Personal Information” is information that identifies you as an individual. Personal Information may in certain circumstances include such information as name, address, phone number, email address, credit history, social security number, driver’s license number, credit or debit card number, policy or claim information, automobile and home information, health information, username and passwords for online accounts, telematics, and geolocation data. If you apply for a job or register with our career center, Personal Information may, in certain circumstances, also include information about your work and educational history, and other information you choose to provide in connection with your application. If you participate in our voluntary IntelliDrive® program, Personal Information includes but is not limited to the following: your location, information about your vehicle’s speed, braking, and acceleration, and other information regarding the status of your mobile device. It also includes your use of the *IntelliDrive* mobile application including frequency of use, the screens you have viewed, performance data and other activity.

If you submit any Personal Information relating to other people to us or to our service providers, you represent that you have the authority to do so and to permit us to use the information in accordance with this Online Privacy Statement.

How We May Use Personal Information

We may use Personal Information:

- To provide a quote, underwrite and rate policies, respond to your inquiries, fulfill your requests, and complete your transactions
- To process claims
- To service your insurance
- To confirm or correct what we know about you
- To help us prevent fraud and other crimes



- To provide location-based services, such as roadside assistance.
- To record telematics and trip information through the *IntelliDrive* mobile application if you participate in our voluntary *IntelliDrive* program. The *IntelliDrive* mobile application captures data about your driving
- To comply with applicable laws
- To perform research or send you surveys
- To send you information that we believe may be of interest to you
- To personalize your experience on the Services
- To facilitate social sharing functionality
- To allow you to participate in sweepstakes, contests and similar promotions and to administer these activities. Some of these activities have additional rules, which could contain additional information about how we use and disclose Personal Information, so we suggest that you read these rules carefully.
- To allow you to send messages to a friend through the Services. By using this functionality, you are telling us that you are entitled to use and provide us with your friend's name and email address.
- To inform you of job opportunities and to evaluate your suitability for a job
- To contact you at a telephone number you provide to us, including if the number is for a cell phone or other wireless device. We may contact you in person, by recorded message, by the use of automated dialing equipment, by text (SMS) message, or by any other means of communication your device is capable of receiving, as allowed by law and for reasonable business purposes, including to service your policy with us.
- For our business purposes.
- As otherwise allowed by law.

How Personal Information May Be Disclosed

Your Personal Information may be disclosed:

- Within the Travelers family of companies
- To third parties to help us manage or service our business. These third parties can include but are not limited to agents or brokers, other insurance companies, regulators, administrators, and service providers that provide services such as website hosting, data analysis, payment processing,



information technology and related infrastructure provision, email delivery and other services.

- To insurance support organizations and consumer reporting agencies. Information that we share with these organizations, such as your claims history, may be retained by them and disclosed to others.
- To third parties so that they can market their products and services to you, if you have given us permission.
- By you, on message boards, chat, profile pages and blogs and other services to which you are able to post information and materials (including, without limitation, our Social Media Pages). Please note that any information you post or disclose through these services will become public information and may be available to users of the Services and to the general public. We urge you to be very careful when deciding to disclose your Personal Information, or any other information, on the Services.
- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings)
- As we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect our rights, privacy, safety or property, and/or that of you or others; (g) to detect and prevent fraud; and (h) to allow us to pursue available remedies or limit the damages that we may sustain
- As otherwise allowed by law

Other Information We May Collect

“**Other Information**” is any information that does not reveal your specific identity or does not directly relate to an individual, such as:

- Browser and device information
- App usage data
- Information collected through cookies, pixel tags and other technologies
- Physical location
- Demographic information and other information provided by you



- Aggregated information

How We May Collect Other Information

We and our third-party service providers may collect Other Information in a variety of ways, including:

- **Through your browser or device:** Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services (such as an App) you are using. We use this information to ensure that the Services function properly.
- **Through your use of the App:** When you download and use an App, we and our service providers may track and collect App usage data, such as the date and time the App on your device accesses our servers and what information and files have been downloaded to the App based on your device number.
- **Using cookies:** Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the Services, pages visited, language preferences, and other anonymous traffic data. We and our service providers use the information for security purposes, to facilitate navigation, display information more effectively, and to personalize your experience while using the Services, as well as for online tracking purposes. We can recognize your computer to assist your use of the Services. We also gather statistical information about the usage of the Services in order to continually improve the design and functionality, understand how the Services are used and to assist us with resolving questions regarding the Services. Cookies further allow us to select which of our advertisements or offers are most likely to appeal to you and display them while you are on the Services. We and our service providers may also use cookies in online advertising to track responses to our advertisements, and we and our service providers may use cookies or other files to track your use of other websites.

If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You may also wish to refer to <http://www.allaboutcookies.org/manage->

[cookies/index.html](#). However, if you do not accept these cookies, you may experience some inconvenience in your use of the Services. For example, we may not be able to recognize your computer and you may need to log in every time you visit the applicable Services. You also may not receive advertising or other offers from us that are relevant to your interests and needs.

- **Using pixel tags and other similar technologies:** Pixel tags (also known as web beacons and clear GIFs) may be used in connection with some Services to, among other things, track the actions of users of the Services (including email recipients), measure the success of our marketing campaigns and compile statistics about usage of the Services and response rates.
- **IP Address:** Your IP Address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP Address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) that were visited. Collecting IP Addresses is standard practice and is done automatically by many websites, applications and other services. We use IP Addresses for purposes such as calculating usage levels of the Services, helping diagnose server problems, identifying the general location of the device, and administering the Services.
- **Physical Location:** We may collect the physical location of your device by, for example, using satellite, cell phone tower or WiFi signals. We may use your device's physical location to provide you with personalized location-based services and content. We may also share your device's physical location, combined with information about what advertisements you viewed and other information we collect, with our marketing partners to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns. In some instances, you may be permitted to allow or deny such uses and/or sharing of your device's location, but if you choose to deny such uses and/or sharing, we and/or our marketing partners may not be able to provide you with the applicable personalized services and content.
- **From you:** Information such as your location, as well as other information, such as your preferred means of communication, is collected when you voluntarily provide this information. Unless combined with Personal Information, this information does not personally identify you or any other user of the Services.



- **By aggregating information:** Aggregated Personal Information does not personally identify you or any other user of the Services.

How We May Use and Disclose Other Information

Please note that we may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then we may use it as described in “How We May Collect Other Information” section above, as well as for all the purposes for which we use and disclose Personal Information.

Third Party Services

This Online Privacy Statement does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any site or service to which the Services link. The inclusion of a link on the Services does not imply endorsement of the linked site or service by us.

Please note that we are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any Personal Information you disclose through or in connection with the Apps or our Social Media Pages. Please note that we use the Google Maps API(s), which is subject to the Google privacy policy, available at <http://www.google.com/privacy.html>, as such policy may be amended by Google from time to time.

Third Party Advertisers

We do not respond to any web browser “do not track” signals or other similar mechanisms. We may use third-party advertising companies to serve advertisements regarding goods and services that may be of interest to you when you access and use the Services and other websites. To do so, these companies may place or recognize a unique cookie on your browser (including through use of pixel tags), which may allow them to collect information about your online activities over time and across different Web sites, including when you access and use the Services. If you would like more information about this practice and to learn about your choices in connection with these practices, please



visit http://www.networkadvertising.org/managing/opt_out.asp and <http://www.aboutads.info/>.

Children's Privacy

The Services are not directed to individuals under the age of thirteen (13), and we request that these individuals do not provide Personal Information through the Services.

Maintenance of the Services

The Services are maintained by us in the United States and are not intended to subject us to the laws or jurisdiction of any state, country or territory other than that of the United States.

Safeguarding Personal Information

We seek to use reasonable physical, technical and administrative measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us at privacy_officer@travelers.com or by mail at:

165 University Avenue
Toronto, Ontario M5H 3B9
Tel: 416.362.7231 or 1.800.268.8447

Updates to this Online Privacy Statement

We may change this Online Privacy Statement at any time. Please take a look at the "Revised" legend at the top of this page to see the date of the last revision. Any changes will become effective when we post the revised Online Privacy Statement on the Services. Your use of the Services following these changes means that you accept the revised Online Privacy Statement.