

Act 25

- What is Act 25?
- What do I need to know about Act 25 concerning privacy in Québec?
- Why did Act 25 become necessary?
- Who is affected by Act 25?
- Why should I be interested in the implementation of Act 25 at iA Financial Group and its subsidiaries?
- Why is change happening?
- What does Act 25 change or add to the benefit of clients?

Privacy

- Can I withdraw my consent or refuse to provide certain information?
- What personal information can iA Financial Group collect about me?
- How will you respect my choice of consent on secondary wording?
- Questions related to privacy: See Privacy notice

Implementing Consent 2.0

- How will consent 2.0 be collected?
- From whom is consent 2.0 collected?
- At what point in the prospect/client journey should iA implement consent 2.0?
- When should you talk to a client about consent 2.0?
- What are the objectives of consent 2.0?
- In the case of paper consent, what are the guidelines for retaining the generic consent form (including the secondary)? In the case of sales with an intermediary, should one copy be kept by the client and another by the intermediary in the client file? Or is the proof of consent mentioned in line 15 sufficient?

Consent management

- How can clients manage their consent preferences?
- What is acceptable proof of consent?
- What happens if the client refuses consent?

Consent 2.0 details

- What is part of consent 2.0?
- What are the primary purposes?
- What are the secondary purposes?
- What is specific consent?



Act 25

→ What is Act 25?

The Act makes sweeping changes to the legislative framework for privacy, including amendments to two important pieces of legislation: the Act respecting privacy in the private sector and the Act respecting access to documents held by public bodies and privacy.

→ What do I need to know about Act 25 concerning privacy in Quebec?

Formerly Bill 64, Act 25, which has now been passed and assented to, modernizes the legislative provisions governing privacy. It has the merit of revitalizing two main laws applicable in Quebec, namely the Act respecting access to documents held by public bodies and the privacy, and the Act respecting the privacy in the private sector. It also gives citizens greater control over their personal information.

→ Why did Act 25 become necessary?

Existing laws did not take into account today's technological reality. They had to be adapted to ensure privacy. For example, the collection and exploitation of personal information is very easy these days, especially with the use of artificial intelligence. What's more, the economic importance of collecting and using personal information is growing worldwide.

→ Who is affected by Act 25?

Since Act 25 amended both the Act respecting access to documents held by public bodies and privacy and the Act respecting privacy in the private sector, all public bodies, all private companies doing business in Quebec and, of course, all citizens are affected by this major reform.

→ Why should I be interested in the implementation of Act 25 at iA Financial Group and its subsidiaries?

Always mindful of clients' best interests, iA Financial Group and its affiliates do everything in their power to comply with various regulations, particularly those relating to privacy, compliance with best practices and the protection of clients' personal information. Moreover, iA Financial Group and its subsidiaries are always committed to complying with laws and regulations for the benefit of their clients.

→ Why is change happening?

Quebec is a pioneer in Canada, having initiated this in-depth shift with the Act to modernize the legislative provisions governing privacy ("Act 25") adopted on September 21, 2021: this law, which sets out new requirements for privacy, aims to, among other things:

- Give citizens back control over their personal information;
- Strengthen privacy;
- Clean up data management.

→ What does Act 25 change or add to the benefit of clients?

Many rights and obligations in terms of citizens' privacy have been modified or added to better reflect today's reality. It allows for better protection of the rights of the person targeted by the personal information by giving them more control over the treatment of their personal information and a better understanding of their choices.



Privacy

→ Can I withdraw my consent or refuse to provide certain information?

You may withdraw your consent at any time. However, we may no longer be able to offer you our products or services.

→ What personal information can iA Financial Group collect about me?

The personal information required to serve you may vary depending on the products and services requested.

→ How will you respect my choice of consent on secondary wording?

When we are informed of your wish to withdraw your consent, we will make every effort to ensure that all our employees and representatives are informed and take this into account in any processing they may have to do with your personal information. It may take up to 30 days for your wishes to be properly communicated to those concerned.

→ Questions related to privacy: See Privacy notice

For any questions related to the use of personal information such as the examples below, please refer to the Privacy notice that was sent to you in the memory aid.

- Why does iA Financial Group use my personal information?
- Who can my personal information be shared with?
- Is my personal information safe?

Implementing Consent 2.0

→ How will consent 2.0 be collected?

"Consent 2.0" will need to be collected directly from the individual to whom the personal information relates, in a separate section of the terms and conditions. It is possible for the entity to collect an individual's PR from another individual if that individual consents. Specific consent will be required.

→ From whom is consent 2.0 collected?

Consent 2.0 must be obtained directly from the individual concerned by the personal information ("PI") we wish to collect. (e.g.: prospect, contractor, policyholder, etc.).

→ At what point in the prospect/client journey should iA implement consent 2.0?

Consent 2.0 should be requested before or at the time of the individual's PI collection. It should be inserted into web forms and applications filled out during the initial collection of PI, generally at the beginning of the client or prospect journey, when applicable (subscription, membership, request for products or services, account opening, etc.).

→ When should you talk to a client about consent 2.0?

Each business unit has assessed the best time to collect 2.0 consent from its clients, respecting the principle that consent should be sought at or before the time personal information is collected, from those stakeholders for whom the purposes of 2.0 consent apply.

→ What are the objectives of consent 2.0?

Inform and reassure clients about how iA Financial Group collects, uses, and discloses their personal information: For iA Financial Group and its affiliates, protecting the personal information you entrust to us is a priority. If clients want to know more: refer them to the Privacy Notice on the website.

→ In the case of paper consent, what are the guidelines for retaining the generic consent form (including the secondary)? In the case of sales with an intermediary, should one copy be kept by the client and another by the intermediary in the client file? Or is the proof of consent mentioned in line 15 sufficient?

The entity must be able to demonstrate at any time that the individual has accepted or refused consent 2.0 and make the link between the individual and the version of consent obtained. Such a requirement also exists for any other specific consent that may be required in the circumstances.

Thus, for example, databases or registers, consent forms (written or computerized), logs (systems, applications or other) could be kept as proof of consent, provided the authenticity and integrity of the information contained therein can be demonstrated. The business unit must determine which method of retaining proof of consent is the most appropriate in the circumstances.



Consent management

→ How can clients manage their consent preferences?

Clients may review and modify their consent preferences for the collection, use and disclosure of their personal information at any time. Please note, however, that they will no longer be able to receive offers of our products and services if they withdraw their consent for a purpose that is essential to the relationship with them (see the section *We collect your personal information for specific purposes*, for more details - <https://ia.ca/privacy-policy>).

1- In the secure client space: the client can check off whether he or she accepts or refuses the various consent purposes.

2- By telephone: A CCC agent can check the client's consent preferences during a telephone conversation.

3- By your advisor: An advisor can enter the client's consent preferences during a face-to-face meeting, using a form.

→ What is acceptable proof of consent?

The entity must be able to demonstrate at any time that the individual has accepted or refused the consent 2.0 and link the individual to the version of consent obtained. Such a requirement also exists for any other specific consent that may be required in the circumstances.

For example, databases or registers, consent forms (written or computerized), logs (systems, applications or other) could be kept as proof of consent, provided the authenticity and integrity of the information contained therein can be demonstrated. The industry must determine which method of retaining proof of consent is most appropriate in the circumstances.

→ What happens if the client refuses consent?

Withdrawal of primary consent entails, depending on the case: the impossibility of providing the product/service or termination of the contract. It implies that business units respect client treatment preferences in their business practices (solicitations and use of PI for marketing purposes). In the event of withdrawal of a client's primary or secondary consent in an iA Group entity or Business Unit, all Business Units/Entities must guarantee such withdrawal(s) within 30 days.

In some cases, the law allows us to collect, use or disclose clients' personal information without obtaining their consent.

Here are a few examples:

- Communicating personal information to suppliers for a purpose covered by this notice, to offer the product or service requested
- Conducting statistical studies using de-identified personal information, where permitted by law
- To take necessary measures in the event of the detection of potential fraud
- In Quebec only, to use such personal information if it is clearly for the benefit of the client, or for purposes related to those already agreed to by the client
- Outside Quebec, use or disclose personal information if it is clearly for the benefit of the client and we cannot obtain the client's consent

We may also be required by law to disclose personal information. For example, if a court orders us to do so, or if a regulatory authority or self-regulatory organization requests it.

Consent 2.0 details

→ What is part of consent 2.0?

Consent 2.0 is divided into 3 sections:

Section 1: Primary purposes to which all iA Group clients are exposed. Withdrawal of primary consent results, as the case may be, in the impossibility of providing the product/service or in termination of the contract, as these are potential activities that are mandatory in order to be able to offer our products and services.

The 2nd section: Secondary purposes (not applicable for certain business units or defined clients) represent business activities that we would like to do, but which are optional, while being in the mutual good of iA and the client (See the Consent 2.0 presentation document or the PRP notice for more details).

The final section informs our clients more specifically about certain third parties to whom their PI may be disclosed. This section is usually customized to the reality of each business unit.

→ What are the primary purposes?

Clients are informed that their personal information is collected for primary purposes, including identifying them, building and maintaining a relationship with them, complying with laws, and managing risks. The complete content of these primary purposes is available in the Privacy Protection Notice, which can be accessed at <https://ia.ca/privacy-policy>.

Please note that if a client withdraws their consent for primary purposes (essential purposes), it may result in the inability to provide the requested product or service, or termination of the contract in some cases.

→ What are the secondary purposes?

Clients are informed that some purposes of the collection of their personal information are optional to do business with us. They can consent to these purposes to benefit from a distinctive client experience and tailored offers that meet their needs. We are required to obtain their separate consent in order to collect, use, disclose, and retain their personal information for the following purposes: 1) improve our products and services and offer a distinctive client experience; 2) inform them of our promotions, products, services, contests, and events that may interest them.

The complete content of this optional collection is available in the Privacy Protection Notice, which can be accessed at <https://ia.ca/privacy-policy>.

It is important to note that clients have the option to withdraw their consent at any time without affecting our relationship with them. However, it should be noted that the withdrawal of their consent may take up to 30 days to be processed and applied.

→ What is specific consent?

Specific consent is used to collect PI from Third Parties. When collecting PI from Third Parties rather than from the individual, we want to make sure that the individual understands the collection that is going to take place, and that this collection is easily usable with the Third Party.

Requires determining when the entity collects PI from a third party and identifying:

- whether this collection is for primary or secondary purposes,
- what PI will be collected and assess their sensitivity,
- if such collection goes against the reasonable expectations of the individual or if it may create a significant residual risk of serious prejudice to the individual.