# Mutual Xchange

## **MutualXchange Privacy Policy**

Last updated: 1<sup>st</sup> October, 2025

## 1) Who we are

MutualXchange Inc. ("MutualXchange", "we", "us") is an invite-only membership platform for Canada's Mutual Insurance sector. We provide curated access to experts and programs (including an Expert Network, Agent Recruitment, a vetted partner Marketplace, High-Value Claims Resolution, Human Capital programs, and Leadership Peer Forums). Services are engaged à la carte under separate agreements. My Site

This policy explains how we handle personal information across Canada in accordance with **PIPEDA** and, where applicable, substantially similar private-sector laws in **Québec, Alberta, and British Columbia**. For reference on PIPEDA and Canadian anti-spam rules (CASL), see the Office of the Privacy Commissioner of Canada and Government of Canada resources. <u>CRTC+3Privacy Commissioner Canada+3Privacy Commissioner Canada+3</u>

Note: This policy governs **personal information** (info about an identifiable individual). Much of what we process is **business contact information** (e.g., work email/role) in a professional context.

## 2) Scope & roles covered

This policy covers personal information for the following groups:

- Website visitors & inquiry form submitters (e.g., "Request Invitation"). My Site
- **Member organizations' authorized users/executives** (for membership intake, service delivery). My Site
- Experts/consultants who opt to join the Expert Network (professional profiles). My Site
- Agent Recruitment participants (if you apply to, or are evaluated for, a Mutual's agency program). My Site
- Marketplace partners/vendors (business contacts and capability information). My Site
- **Leadership Peer Forum participants** (registrations, participation, and anonymized outputs). My Site
- High-Value Claims Resolution participants (contacts and process notes limited to facilitation). My Site

# 3) What we collect (by context)

We collect only what is needed to deliver membership and services:

#### A) Website & forms

Name, work email, phone, organization, role, your message, meeting preferences; technical data (IP, device/browser, pages visited) via cookies/analytics.

#### B) Membership intake & delivery

Member contacts (names, roles, work emails/phones), intake notes about priorities and service needs; scheduling, billing and contract metadata.

#### C) Expert Network (opt-in)

Professional profile (CV/resume, experience in Mutual/P&C contexts, credentials), role preferences, availability, regions, rates (if volunteered), references.

#### D) Agent Recruitment

Application info for agency candidates (contact details, experience, licensing progress), program logistics.

#### E) Marketplace partners

Business contact info, service descriptions, Mutual-relevant credentials or attestations.

#### F) Peer Forum

Registration details, attendance, and **session outputs**. Forum deliverables are issued in **anonymized form**; sessions operate under a confidentiality principle (see Section 10). <u>My</u>
<u>Site</u>

#### G) Claims Resolution

Contact details of participating parties, scheduling and process notes limited to facilitation; records necessary to structure mediation. My Site

## 4) Why we use it (purposes)

- To respond to inquiries and manage memberships. My Site
- To scope and deliver services (expert matching, agent recruitment, marketplace introductions, forums, claims facilitation, human-capital programs). <u>My Site+3My</u> Site+3My Site+3
- To send service communications, event updates, and (with consent) insights or announcements.
- To operate, secure, and improve our website and services.
- To comply with law and enforce agreements.

We do **not** sell personal information.

# 5) Consent & your choices

We rely on your **knowledge and consent** for collection, use, and disclosure, except where permitted or required by law. You may **withdraw consent** at any time (subject to legal/contractual limits), which may affect our ability to provide services. For commercial emails, we follow **CASL**—you can unsubscribe at any time. Privacy Commissioner Canada+1

# 6) Cookies & analytics

We may use cookies, tags, and analytics to understand site usage and improve performance. You can control cookies via your browser; some features may not work

without them.

## 7) Disclosures (who sees your info)

We disclose personal information only as needed to deliver services or as authorized by you:

- **To Member organizations** considering you for an engagement (e.g., when you opt into the Expert Network or an Agent program).
- **To vetted service providers** (hosting, email/CRM, scheduling, analytics, document storage) under confidentiality commitments.
- To Marketplace partners when you request or approve an introduction. My Site
- To Forum cohorts (in aggregated/anonymized form in takeaways). My Site
- To regulators or authorities where required by law.
- In transactions (e.g., merger/acquisition), subject to confidentiality.

## 8) Cross-border transfer

Some service providers may store/process data outside Canada (e.g., U.S.). We take reasonable measures (contractual, technical, and organizational) to ensure comparable protection consistent with Canadian law.

## 9) Security

We use administrative, technical, and physical safeguards proportionate to sensitivity—access controls, encryption in transit (and at rest where appropriate), least-privilege access, and secure deletion practices.

# 10) Retention

We keep personal information only as long as necessary for the purposes above or as required by law, then securely delete or de-identify it.

# 11) Your rights

You may request **access**, **correction**, or **deletion** of your personal information, or ask questions about our practices. We will respond within a reasonable time, subject to legal limits.

# 12) Contact (Privacy Officer)

MutualXchange Inc. — Privacy Officer

<u>privacy@mutualxchange.ca</u> 905-870-3679

If we cannot resolve your concern, you may contact the **Office of the Privacy Commissioner of Canada** (and in Québec/AB/BC, the relevant provincial commissioner).

<u>Privacy Commissioner Canada</u>

# 13) Changes to this policy

If we change this policy, we will post an updated version wi	ith a new "Last updated" date.