



CMA Holdings Privacy Code

Protecting your privacy

Our ongoing commitment

June 23, 2009

Commitment to privacy

Safeguarding your confidentiality and protecting your personal information are fundamental to the way we do business with you.

Scope

This Code applies to CMA Holdings¹ (CMAH) and its subsidiaries (collectively, the MD group of companies²).

We believe the best way to ensure that your information is treated with the respect it deserves is by basing our practices on the 10 interrelated principles that follow. We have applied these principles to develop privacy policies that detail how our financial services and practice management business groups collect, use and disclose your personal information. Where applicable, privacy statements have been developed to provide you with specific information about our information-handling practices in conjunction with specific products and services that you use. These policies and statements are available from your client contact representative as well as on our websites.³ Collectively, this Code, the privacy policies and privacy statements are designed to provide a cohesive and unified framework to guide the information-handling practices of the MD group of companies.

1. Accountability

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.

2. Identifying purposes

The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.

3. Consent

The knowledge and consent of the individual are required for the collection, use or disclosure of personal information, except where inappropriate.

4. Limiting collection

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.

5. Limiting use, disclosure and retention

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

6. Accuracy

Personal information shall be as accurate, complete and up to date as is necessary for the purposes for which it is to be used.

7. Safeguards

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

8. Openness

An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

9. Individual access

Upon request, an individual shall be informed of the existence, use and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

10. Challenging compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals who are accountable for the organization's compliance.

Policies that detail how the MD group of companies manage personal information that has been and will be collected, used and disclosed are available from your client contact representative as well as on our websites.

Addressing your questions or concerns

If you have comments, questions or concerns, you can always contact our Chief Privacy Officer at:

- 1870 Alta Vista Dr., Ottawa ON K1G 6R7, or
- privacy-md@cma.ca or confidentialite-md@amc.ca

You can also contact the Privacy Commissioner of Canada via this website: privcom.gc.ca or the Privacy Commissioner in your province or territory.

1870 Alta Vista Dr.
Ottawa ON K1G 6R7
1 800 267-2332
cma.ca

¹ CMA Holdings refers to CMA Holdings 2009 Inc., a wholly owned subsidiary of the Canadian Medical Association.

² As of the date of publication, the MD group of companies comprises MD Financial (referring to MD Physician Services Inc., MD Management Limited, MD Private Trust Company, MD Private Investment Management US Inc., MD Life Insurance Company and MD Insurance Agency Limited) and Practice Solutions (including Practice Solutions Software Inc.).

For a detailed list of companies, visit md.cma.ca.

³ md.cma.ca; cma.ca/practicesolutions