

PRIVACY POLICY



Instant Risk Coverage Inc. | Effective: January 1st, 2018 | Last updated: September 1st, 2026

Instant Risk Coverage Inc. ("we", "us", "our") respects your privacy. This Policy explains what personal information we collect, why we collect it, how we use, disclose, safeguard and retain it, and the choices and rights available to you. It applies to all personal information we handle in the course of our commercial activities through our website, our online forms, portals and applications, and offline channels such as telephone, email and in-person dealings. We handle personal information in accordance with the federal **Personal Information Protection and Electronic Documents Act (PIPEDA)**, Canada's Anti-Spam Legislation (**CASL**), and applicable provincial privacy laws, including Quebec's **Law 25** and the **Personal Information Protection Acts** of Alberta and British Columbia. "Personal information" means information about an identifiable individual, other than business contact information used solely to communicate with you in a professional capacity.

1. Accountability

We are responsible for all personal information under our control, including information transferred to third parties for processing on our behalf. Our Privacy Officer is accountable for compliance with this Policy and may be contacted at: **Privacy Officer, Instant Risk Coverage, 300-462 King St. W, Toronto ON M5V 1L7 • privacy@ircnow.com • (800) 517-1390.**

2. Personal information we collect

- **Information you give us:** name, email address, telephone number, mailing address, organization and role, payment and billing details, and the contents of messages, quotes, applications or forms you submit.
- **Information collected automatically:** IP address, approximate location, device and browser type, operating system, referring page, pages viewed, dates and times, and interaction data (clicks, scrolling, form entries and session recordings) gathered through cookies, tags and analytics tools.
- **Information from others:** details provided by partners, brokers, referral sources, payment processors and publicly available sources, where permitted by law.

We limit collection to what is necessary for the purposes identified in section 3, and we collect it by fair and lawful means.

3. Why we collect it

We collect, use and disclose personal information to: (a) respond to your inquiries, quotes and requests; (b) provide, administer, personalize and improve our products, services and website; (c) process transactions, payments and billing; (d) send transactional and service messages and, with your consent, newsletters and marketing communications; (e) perform analytics, site optimization, security monitoring and fraud prevention; (f) manage our business relationships and train our staff; and (g) meet our legal, regulatory, audit and contractual obligations. We will not use or disclose your personal information for a new purpose without first identifying that purpose and obtaining your consent, except where the law permits or requires us to do so.

4. Consent

We obtain your consent before or at the time of collection, and we explain the purposes in a manner you can reasonably understand. Express (opt-in) consent is obtained for sensitive information, for non-essential tracking technologies, and for commercial electronic messages as required by CASL; implied consent may be relied on for clearly evident, non-sensitive purposes such as replying to a message you send us. Merely browsing our website is not treated as consent to non-essential collection. **You may withdraw your consent at any time**, subject to legal or contractual restrictions and reasonable notice, by contacting our Privacy Officer or by using the unsubscribe link in any marketing email (honoured within 10 business days and functional for at least 60 days). Withdrawal may limit our ability to provide certain services, and we will tell you if that is the case.

5. Cookies, analytics and session replay

Strictly necessary cookies keep the site secure and functional. Analytics, session-replay and advertising technologies which may include Google Analytics, Microsoft Clarity and Microsoft Advertising, and similar tools that generate behavioural metrics, heatmaps and data of your session. You can review or change your choices at any time through your browser controls. These providers process data under their own privacy statements.

6. Disclosure to third parties

We do not sell, rent, trade or otherwise disseminate your personal information. We disclose it only: to service providers acting on our instructions under written contract; or to a party to a prospective business transaction, subject to confidentiality and use restrictions; with your consent; and where required or permitted by law, including in response to a court order, subpoena, regulator or law-enforcement request. Service providers may use the information only for the purposes we specify in accordance to section 3 and must protect it to a standard comparable to our own.

7. Retention and destruction

We keep personal information only as long as necessary to fulfil the purposes for which it was collected or as required by law, tax and regulatory requirements, and our records-retention schedule. Information used to make a decision about you is retained for at least one year after the decision so that you have an opportunity to request access. When information is no longer needed, we securely destroy, erase or anonymize it.

8. Safeguards and breach response

We protect personal information with administrative, technical and physical safeguards appropriate to its sensitivity, including encryption in transit and at rest, access controls on a need-to-know basis, secure disposal, staff training and confidentiality agreements, and due diligence on service providers. No method of transmission or storage is completely secure. If a breach of security safeguards creates a real risk of significant harm, we will report it to the Office of the Privacy Commissioner of Canada and any other applicable regulator, notify affected individuals as soon as feasible, and keep a record of every breach for 24 months.

9. Your rights: access, correction and more

On written request, we will confirm whether we hold personal information about you, give you access to it, and tell you how it has been used and to whom it has been disclosed. We respond within 30 days at minimal or no cost; if we need an extension or must refuse all or part of a request (for example, where disclosure would reveal another person's information or solicitor-client privileged material), we will tell you in writing, give reasons, and explain your recourse. You may challenge the accuracy and completeness of your information and have it amended. Residents of Quebec may also request that information be transmitted in a structured, commonly used technological format and may request de-indexing or ceased dissemination in the circumstances the law allows.

10. Automated decision-making

If we use personal information to render a decision about you based exclusively on automated processing, we will inform you at the time of the decision and, on request, tell you what personal information was used, the principal factors and parameters that led to the decision, and give you the opportunity to submit observations and have the decision reviewed by a person.

11. Children

Our website and services are directed to adults and are not intended for children. We do not knowingly collect personal information from a minor without the consent of a parent or guardian. If you believe we have done so, contact our Privacy Officer and we will delete it.

12. Third-party links

Our website may contain links to, or offers for, third-party sites, products or services. Those sites operate under their own separate and independent privacy policies, and we are not responsible for their content or practices. We encourage you to review their policies before providing any personal information. We welcome feedback about any site we link to.

13. Changes to this Policy

We may update this Policy from time to time. The current version is always posted on this page with its effective date. If a change materially affects how we use or disclose personal information we already hold, we will provide notice by email and, where the law requires, obtain fresh consent before the change takes effect.

14. Questions and complaints

Please direct any question, access request or complaint to our Privacy Officer using the contact details in section 1. We will acknowledge your complaint, investigate it, and respond in writing; if it is well-founded, we will take appropriate corrective action, including amending our policies and practices. If you are not satisfied with our response, you may contact the **Office of the Privacy Commissioner of Canada** (priv.gc.ca · 1-800-282-1376) or, where applicable, the **Commission d'accès à l'information du Québec**, the **Office of the Information and Privacy Commissioner of Alberta**, or the **Office of the Information and Privacy Commissioner for British Columbia**.