

Sun Life Assurance Company of Canada ("the Company"), a member of the Sun Life group of companies, provides insurance and other financial services to our customers. As part of these services, we are trusted with confidential information. We take this responsibility seriously. All of our employees and our authorized representatives recognize the importance of maintaining confidentiality. The Company gathers information about you to determine fair and reasonable rates for your insurance. Once you are a policyholder, we will need information about you to:

- provide a number of services,
- reinstate a policy; or
- evaluate requests for changes in coverage.

## Confidentiality

Insurance companies are among the largest gatherers of information about people. The Company has long been aware of the importance of guarding the confidentiality of such information. We have internal standards and controls governing its use. All employees must follow the procedures outlined in our Code of Business Conduct. Other than as required or allowed by law, the information gathered will not be released to anyone without your authorization or consent.

## Collection of Information

We need to obtain information about you to determine whether we can provide the insurance coverage you have requested and to determine a fair and reasonable premium for it. We also use the information we obtain from you to maintain and service your account.

The information collection process begins when you apply for insurance. The application for insurance seeks basic information about you, e.g., your name and address, as well as more detailed information about your health. As part of the application process, we may ask you to undergo a physical examination, submit a statement from your physician, or provide copies of medical tests or other information relating to your health, finances and activities.

The Company may also request that you submit to certain laboratory tests. Such tests may include an analysis of blood, urine and/or saliva. The testing is done by a licensed laboratory and the results are sent directly to us.

We also may collect information about you from other sources. By signing the Authorization For Release And Disclosure of Health Related Information, the Authorization for Release and Disclosure of Non-Health Related Information and/or the Authorization for Release and Disclosure of Psychotherapy Notes, you authorize us to obtain the medical and non-medical information about you that we need to underwrite your application. Depending upon your particular circumstances, we may collect additional information about you from:

- physicians, health care providers, health plans, medical professionals, hospitals, clinics, laboratories, therapists, pharmacy benefit managers, medical information retrieval services, electronic health record company, health care information technology company, health information exchange, or other medical or health care related facilities;
- benefit plan administrators;
- employers;
- other insurance companies you have applied to for insurance;
- insurance support organizations;
- financial institutions;
- government agencies, such as the Social Security Administration, the Internal Revenue Service, or the Veteran's Administration;
- public records, such as motor vehicle records; and
- consumer reporting agencies.

Information obtained from a report prepared by an insurance support organization may be retained by the insurance support organization and disclosed to other persons.

## The Underwriting Process

Group medical underwriting is a process by which an insurance company assesses the health of individual applicants to determine if they qualify for insurance coverage above the guarantee issue limit. The information obtained as part of this process may consist of:

- a medical examination;
- blood and urine tests;
- special tests;
- medical records from health care providers or hospitals;
- motor vehicle reports; and/or
- other information collected from the sources described in the above section.

Using this information, the underwriters will further evaluate the risk based on other factors, such as:

- tobacco use;
- driving record; or
- hazardous activities.

After the evaluation process is completed, the underwriter may not accept the risk. If we do not accept the risk, you will be notified. You have the right to request in writing the reason for this action within ninety (90) business days of the date we mail you the notice or other communication of the adverse underwriting decision. You must complete a written authorization and send it to our medical underwriting manager. We will promptly send the requested information. In those states that prohibit the release of sensitive information directly to the prospective Insured, we will do so through a named physician or health department.

Please send this type of request to:

Sun Life Assurance Company of Canada  
Group Medical Underwriting  
Attention: Medical Underwriting Manager  
P.O. Box 81344  
Wellesley Hills, MA 02481

## Laboratory Testing

To assist in determining your eligibility for insurance, the Company may request some lab testing to be completed. This could include an analysis of blood, urine and/or saliva obtained as part of your insurance exam. The testing is done by a licensed laboratory and the results will be sent directly to us.

The blood testing may include tests for:

- HIV antibody;
- diabetes;
- kidney and liver functions;
- hepatitis;
- cholesterol;
- other tests.

Urine testing may include tests for:

- diabetes;
- kidney function;
- prescription medications;
- drugs of abuse; and
- nicotine/cotinine tests.

As with the rest of your medical information, all test results are treated confidentially and shared only with your authorization and consent, except as required by law. Some states require the reporting of positive tests for HIV and for hepatitis to the state department of health.

## Disclosure of Personal Information

When you sign the Authorization for Release and Disclosure of Health Related Information, the Authorization for Release and Disclosure of Non-Health Related Information and/or the Authorization for Release and Disclosure of Psychotherapy Notes, you authorize us to disclose information we have about you to:

- any other insurance company you have applied to for insurance;
- third party administrators;
- rehabilitation or vocational professionals;
- your treating physician, psychologist or therapist/counselor, for the purpose of verifying, evaluating, negotiating, determining and/or adjudicating your claim for insurance benefits;
- your employer, its agents, and any plan sponsor, administrator or other service provider of any benefit plan in which you participate or leave/accommodation services associated with your employment;
- other persons or organizations performing medical, investigative, financial or legal services related to your claim;
- the Company's subsidiaries and affiliates; or
- as required or permitted by law.

In the course of underwriting your application or maintaining or servicing your account, we may need to disclose information about you to others. The law permits us to disclose such information, without obtaining authorization from you, to:

- companies that help us conduct our business or perform services on our behalf;
- your physician or treating medical professional; and
- comply with federal, state or local laws; to respond to a subpoena; or to comply with an inquiry by a governmental agency or regulator.

## Access, Correction, Amendment or Deletion of Personal Information

Upon written request to the Company, you can:

- request that we inform you of the nature and substance of the personal information we have about you;
- obtain a copy of the personal information we have about you in our files, and the identity of the medical professional or institutional source(s) of that information, either by mail or in person if you prefer (a fee may be charged to cover the cost of providing a copy of such information);
- request that we disclose to you the identity, if recorded, of those persons to whom we disclosed your personal information within the two (2) years prior to your request (or, if not recorded, the names of those persons to whom we normally disclose such information);
- request that we correct, amend, or delete any personal information about you in our possession; and
- file your own statement of facts if you believe that the personal information we have about you is incorrect.

To take any of these actions, please contact the Company for further instructions. We will respond to your written request within thirty (30) business days from receipt of your request. If we refuse your request to correct, amend, or delete your personal information, we will notify you of the reason(s) for our refusal. If you disagree with our decision, you will have the right to file a concise statement with us setting forth what you think is the correct, relevant or fair information and why you disagree with our refusal to correct, amend or delete your personal information.

## Contact us



### By mail

Sun Life Assurance Company of Canada  
One Sun Life Executive Park  
Wellesley Hills, MA 02481



[www.sunlife.com/us](http://www.sunlife.com/us)



Customer Service **800-247-6875** M–F 8:00 a.m. – 8:00 p.m., ET

## State Notices

### As an addition to the Access, Correction, Amendment or Deletion of Personal Information section:

**For residents of Arizona:** Upon your request, we will reconsider our underwriting decision based on any corrected information or your own statement of facts.

**For residents of California:** Please go to [www.sunlife.com/us](http://www.sunlife.com/us) and select the privacy link at the bottom of the page to read our California Privacy Policy and Notice and other related privacy notices.

**For residents of Minnesota:** If we refuse to correct, amend or delete disputed personal information, you may file an appeal with your Insurance Commissioner.

If a health care professional or a health care institution has provided us health information that the health professional or health care institution has determined and indicates in writing that the release of the health record information is detrimental to your physical or mental health or is likely to cause you to inflict self-harm or to harm another, we may provide the information directly to you only with the approval of the health professional with treatment responsibility for the condition to which the information relates. If approval is not obtained, the information must be provided to the health professional designated by you.

**For residents of Montana:** Your Insurance Commissioner may review a refusal by us to correct, amend or delete any recorded personal information in order to determine if the information is correct. Your Insurance Commissioner may order us to correct, amend or delete information that the Insurance Commissioner determines is erroneous in your recorded information file.

**For residents of Virginia:** Disclosure directly to you may be denied if a treating physician, clinical psychologist, or clinical social worker has determined, in the exercise of professional judgment, that the disclosure requested would be reasonably likely to endanger your life or physical safety or that of another or that the information requested makes reference to a person other than a health care provider and disclosure of such information would be reasonably likely to cause substantial harm to the referenced person.

If disclosure to you is denied, you may request we either:

- (i) designate a physician, clinical psychologist, or clinical social worker acceptable to us who was not directly involved in the denial, and whose licensure, training, and experience relative to your condition are at least equivalent to that of the physician, clinical psychologist, or clinical social worker who made the original determination, who shall, at our expense, make a judgment as to whether to make the information available to you; or
- (ii) if you so request, make the information available, at your expense to a physician, clinical psychologist, or clinical social worker selected by you, whose licensure, training, and experience relative to your condition are at least equivalent to that of the physician, clinical psychologist, or clinical social worker who made the original determination, who shall make a judgment as to whether to make the information available to you.

We shall comply with the judgment of the reviewing physician, clinical psychologist, or clinical social worker made in accordance with the foregoing procedures.

### As an addition to the Access, Correction, Amendment or Deletion of Personal Information section:

**For residents of New Mexico:** Pursuant to the New Mexico Domestic Abuse Insurance Protection Act, and insurance regulations promulgated thereunder, we are required to inform you that the medical and other records provided to us as part of the routine underwriting review may include confidential abuse information. The term "confidential abuse information" includes, for example, information about acts of domestic abuse or abuse status, or the work or home address or telephone number of a victim of domestic abuse. We are prohibited by law from using confidential abuse status as the sole basis for denying, refusing to issue, renew or reissue or canceling or otherwise terminating insurance coverage, restricting or excluding coverage or benefits or charging a higher premium. The Domestic Abuse Insurance Protection Act provides you with certain rights to access confidential abuse information received by us and to have that information corrected if it is not accurate.

We are also required to inform you that those who are or have been victims of domestic abuse, or provide shelter, advocacy, counseling or protection to victims of domestic abuse, may request participation as a "protected person" under our location information confidentiality program. This means that we will take measures, as may be required by applicable New Mexico insurance regulations, to help maintain the confidentiality of certain location information in our records. The term "location information" means your address, home telephone number, place of employment, school or other location information. Please notify us, at the contact information provided in The Underwriting Process section, if you wish to participate in this program.