



Distribution Practices

Reference Document

DATE: April 21, 2021

SUBJECT: New Year – New Password Reminder!

Just a friendly reminder that passwords should never be shared.

Empire Life's terms of use and Privacy Policy apply to you in accessing our portals, systems and website. You are solely responsible for all actions performed under and through your account and you may not share your login information with any other person or allow any other person to use your account. If someone requires access to Empire Life systems, please send please complete the registration process on our website, under the Business Centre.

By registering for an account to access Empire Life's systems, you have agreed to keep any password strictly confidential and to notify Empire Life immediately if you know or have reason to believe that the security of your password has been compromised. Should a client feel their privacy was breached because a person they did not know accessed their information using your account, your client may make a complaint to the Privacy Commissioner.

Sharing your password is not only a violation of Empire Life's Privacy Policy and possibly privacy legislation; you could also be engaging in fronting. Applications that are submitted using someone else's credentials is fronting. The application that we receive will indicate a different advisor than the person who actually made the sale with the client. Fronting is reportable to regulators and can result in the termination of your contract with Empire Life.

For example, Advisor A does not have a Fast and Full login, but will be meeting with a client who wants insurance. Advisor A and Advisor B work together in the same office. Advisor A makes arrangements with Advisor B to use Advisors B's login to complete and submit the application. The application that Empire Life receives will indicate Advisor B as the person who worked with the client.

It is never okay to share your credentials with someone else. Everyone accessing Empire Life systems must have their own log in credentials.

For more information, please consult the [Legal](#) section or our website, our [Privacy Policy](#) and our Circular on [Fronting](#).