



**INSURANCE BROKERS
ASSOCIATION OF SASKATCHEWAN**

Derek Lothian
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Monday, September 30, 2019

Randy Stoneham
Director, Issuing & Customer Support Services
SGI
2260 – 11th Ave.
Regina SK S4P 0J9

Re: MySGI Advertising Protocol

Randy:

On behalf of the Insurance Brokers Association of Saskatchewan (IBAS) board of directors, thank you for your e-mail (accompanying this letter), dated September 12, 2019, which outlines proposed amendments to the MySGI advertising terms and conditions.

As discussed, IBAS has fielded concerns from both brokerages and consumers in recent months regarding the online renewal process for the basic package of insurance that come standard with licence plates. These concerns have centered around situations whereby consumers have unknowingly switched their issuer of record due to practices that may contradict the current terms and conditions.

It is imperative — as with any type of insurance coverage — that issuers take all *reasonable* measures to ensure consumers are able to clearly identify the entity from which they are purchasing the product. This is not aimed to circumvent innovative marketing programs or stymie issuer competition; rather, it is a fundamental consumer protection that is aligned with Saskatchewan's legislative and regulatory framework for insurance.

Accordingly, to strengthen and clarify permissible activities, IBAS is proposing the following:

1. Amend the terms and conditions so that issuers must clearly identify themselves in all advertising and correspondence by displaying the business name as set out in the licence — or, if appropriate, the operating name most identifiable with the licensee. A logo with the business or operating name should also be acceptable.

2. Add the following clause: *All advertising must reasonably identify what Issuer is advertising or sponsoring a website or redirect website, regardless of the messaging to the alternate site.*
3. Amend the following clause to read: *Internet Issuers' sites and mobile applications must only link to the SGI Online Services page (MySGI) via the approved Online Services button.*
4. With the exception of circumstances set forth in *Recommendation #3*, expressly prohibit the use of SGI's name, logo, or reference to SGI's sub-entities (MySGI) in all consumer-facing advertising, including through the use of mobile applications and search engine advertising. This does *not* prohibit the use of SGI-related keywords to enhance search engine optimization.
5. Clearly articulate and enforce with consistency and transparency remediation and/or punitive measures for non-compliance to the terms and conditions. Uniform, industry-wide compliance is central to a level playing field. Any uneven application of rules — however temporary — can unfairly impact long-term competition and business performance.

Thank you in advance for your consideration in this matter. Don't hesitate to let me know if you have any questions or concerns.

Regards,



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CC: Penny McCune, Executive Vice President & Chief Operating Officer, SGI Auto Fund
J.P. Cullen, Vice President, Licensing, Customer & Vehicle Services, SGI Auto Fund
Dave Pettigrew, President & CEO, Harvard Western Insurance / Chair, Insurance Brokers Association of Saskatchewan

Derek Lothian

From: Randy Stoneham <rstoneham@sgi.sk.ca>
Sent: September 12, 2019 2:53 PM
To: Derek Lothian; JP Cullen
Subject: Re: Follow-Up

Hi Derek,

SGI and IBAS officials had met previously to discuss the possibility of amending SGI's advertising requirements. Our two organizations agreed at the time, to update the requirements to require that issuers identify themselves clearly on all advertising, including any and all websites owned, or under an issuer's control.

Proposed Amendments:

Issuer Terms & Conditions of an Issuing Appointment

Advertising -- SGI does not cost share advertising with any appointed issuer. The issuer may advertise the availability of hours of service but cannot suggest that they offer issuing services not offered by other issuers. Advertising technical issues, coverages, rates, etc., must be approved by SGI before any advertising takes place. Issuers must clearly identify themselves in all advertising and correspondence by displaying the business name as set out in the licence and the address and telephone number of the office or head office. This includes information available on websites and internet advertising.

Internet Issuing Terms and Conditions of Internet Agreement

Additional URLs/Website Addresses – If URLs are purchased with the intent of attracting additional business to the issuing site, a redirect may be used instead of an additional site. The Issuer Management System (Issuer Profile) will only show the issuer/broker's main website and not subsidiary sites intended only to attract the issuing business. Issuers must clearly identify themselves in any advertising and correspondence by displaying the business name as set out in the licence and the address and telephone number of the office or head office. All issuing related content on issuer websites must meet existing guidelines for advertising standards and be approved by Issuer Relations.

Advertising and Signage - Issuer Manual

The following point would be added to the existing guidelines:

All advertising must clearly identify what Insurance Brokerage is advertising or sponsoring a website or redirect website regardless of the messaging of the alternate site. For example, Neutral Agencies owns a site called PlatesforSale.com. Both the Neutral Agencies website and the PlatesforSale.com website must clearly be branded with the brokerage's name and contact information.

Also, is there value in considering strengthening Article 3 of Internet Issuing Terms and Conditions?
Something like:

3. Issuer Website(s)

Internet Issuers' sites **can only** link to the SGI Online Services page (MySGI) via the approved Online Services button. This link

Currently 3 says, Issuer Website(s)

Internet Issuers' sites must link to the SGI Online Services page via the approved Online Services button. ...

Let us know your thoughts concerning these proposed amendments.

Randy

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