

## **Power Sector Retirement Trust - Privacy Policy and Statement:**

The Power Sector Retirement Trust (PSRT) is committed to preserving the privacy and confidentiality of all personal information. As part of this commitment, the Board of Trustees has established this Privacy Policy (“**Policy**”) which describes how it collects, uses, discloses and protects personal information.

The Policy is modelled after the principles contained in the federal Personal Information Protection and Electronic Documents Act (**PIPEDA**). This Policy applies to the personal information of all members enrolling in the PSRT (“**Members**”), PSRT employees, and PSRT Trustees.

All PSRT employees, personnel engaged by the PSRT to provide services (such as Canada Life and other service providers, independent contractors, consultants), and PSRT Trustees must comply with this Policy.

“**Personal Information**” is information that identifies an individual Member, and includes for example: name and address, age, employer, work history, and social insurance number.

The PSRT may collect, receive and access personal information in writing, over the phone, by electronic transmission, or in-person.

Personal information that the PSRT may collect includes, but is not limited to:

- contact information like name, address, telephone number and email address;
- employment information including the name of employer, employment status, employment dates, bargaining agent and unit;
- social insurance number;
- beneficiary designations;
- banking information; and
- other information with your consent or as permitted or required by the *Income Tax Act* (Canada) and applicable law.

## **Privacy Principles**

### **1. Accountability**

The PSRT is responsible for Members’ Personal Information under its possession and control and has a designated Privacy Officer who is accountable for PSRT’s compliance with the following principles, receiving complaints, and investigating privacy incidents. The name and contact information for the Privacy Officer is identified at the end of this document.

### **2. Identifying Purposes:**

The PSRT collects Member information for a variety of services, including:

- to administer the plan and services you applied for (including call centre and web-based servicing)
- to receive required contributions;
- to advise you of products and services which help plan for your financial security;
- to perform internal and external audits of our management of trust monies;
- to perform surveys and understand and analyze Members' retirement needs; and
- to monitor and improve services to Members.

### **3. Consent**

Member knowledge and consent is needed for the collection, use, or disclosure of personal information, except where inappropriate. Member consent to the PSRT's collection, use and disclosure of personal information may be given in various ways. Consent can be express (e.g. orally or in writing, including by signing an enrolment form outlining the intended uses and disclosures of personal information) or implied. Consent may also be given by a Member's authorized representative (such as a legal guardian or a person having a power of attorney).

Generally, by providing the PSRT with personal information, we will assume a Member consents to our collection, use and disclosure of such information for the purposes identified in this Policy, or otherwise identified at the time of collection.

The PSRT will seek the express consent of Members before collecting, using or disclosing personal information for a purpose other than the purposes described in this Policy, unless otherwise permitted or required by law.

When a Member enrolls in the PSRT, consent will be valid for so long as necessary to fulfil the purposes described in this Policy or otherwise at the time of collection, and the Member may not be permitted to withdraw consent to certain necessary uses and disclosures (for example, but not limited to, maintaining reasonable administration and transaction records, disclosures to government entities as required to comply with laws).

### **4. Limiting Collection**

The PSRT will collect only the personal information required for the purposes described in this Policy and will do so only by reasonable and legal means.

### **5. Limiting Use, Disclosure and Retention**

The PSRT limits the use of Personal Information about Members to administer its retirement programs. Examples of these activities include, but are not limited to:

- creating and maintaining a Member database;
- preparing and distributing personalized Member forms and communication documents, including but not limited to statements and election forms;
- collecting contributions from and on behalf of purposes;
- issuing tax receipts;

- verifying Members' identity when responding to inquiries or requests for information;
- meeting legal requirements (including reporting requirements); and
- facilitating general administration of retirement programs.

Personal Information may only be shared with participating employers or third parties when it is necessary for administering the PSRT. For example, third parties include Canada Life, Goldstein Financial, a financial institution from or to whom contributions or payments are required to be made, or other PSRT service providers (for example accountant, auditor, legal advisor, or other service provider or contractor to the PSRT). These service providers are subject to contractual or other measures to protect personal information while processed or handled by them.

The PSRT will disclose personal information in response to a court order, subpoena, search warrant or other lawful requirement without first seeking consent, and you may not be notified of such disclosure.

Personal Information is retained only so long as it is reasonably needed to fulfill the purposes set out above.

The PSRT and its service providers may de-identify personal information which is the subject of this Policy and aggregate the data for their respective business purposes, such as statistical or analytic assessments. The aggregated data may be disclosed to third parties. Individuals to which this Policy applies cannot be personally identified from the de-identified/aggregated data.

## **6. Accuracy**

The PSRT strives to ensure the personal information collected from Members is current and accurate as is necessary to fulfill the purposes for which it was collected. Members are encouraged to review and correct their personal information intermittently, and the PSRT will make every reasonable effort to record and update accurate personal information on an ongoing basis.

## **7. Safeguarding your information**

The PSRT will protect personal information with appropriate safeguards and security measures according to its sensitivity. The PSRT will make every reasonable effort to protect personal information against loss or theft as well as unauthorized access, disclosure, copying, use or modification.

If personal information is to be handled by a third party on behalf of the PSRT, the PSRT will enter into contractual arrangements with the third party to impose appropriate security standards to guard against unauthorized use, modifications or loss of the personal information.

## **8. Openness**

This Policy is available to anyone requesting information about the PSRT's policies and practices relating to the management of personal information. Any questions or concerns may be addressed to the Privacy Officer identified at the end of this Policy.

## **9. Individual access to information**

We want to ensure your Personal Information is accurate and up to date. If you notice any inaccuracies, please let us know. You can also access and modify your personal and account information using the tools provided in our site. We will not modify your personal or account information.

The PSRT will respond to access requests from Members, and there will be no charge for reasonable requests for such access.

### **Inquiries or complaints:**

Questions, concerns or complaints regarding this Privacy Policy, and any request to correct or access personal information collected, may be addressed to:

Administrator is Privacy Officer - [administrator@psrt.ca](mailto:administrator@psrt.ca) – Dennis Eddy

Admin office - [info@psrt.ca](mailto:info@psrt.ca) or 416-240-8479