



## **Summary of Protection of Confidential Information and Privacy Policy** (Complete Policy is available upon request)

The principles are the basis for the Capital Pension Plan's Protection of Confidential Information and Privacy Policy are interrelated. The Capital Pension Plan shall conduct its business in a manner that abides by the following principles as a whole.

### **Accountability**

The Capital Pension Plan is responsible for personal information and confidential information collected by the Plan. The Plan Administrator shall designate a Privacy Officer to be accountable for compliance with the principles and the name and title of this person or persons will be available upon request. All staff members of the Plan Administration are responsible for ensuring compliance with provisions of this policy. The Plan Administration shall develop and implement appropriate policies and procedures to ensure compliance with this policy.

### **Identifying Purpose**

The Capital Pension Plan collects and retains pertinent information required for the provision of Plan member pension benefits at retirement, Plan member termination benefits in the event of termination of employment prior to retirement, survivor benefits to the Plan's member's spouse or other beneficiary(ies) in the event of the Plan member's death prior to retirement, and compliance with the provisions and guidelines of the Income Tax Act (Canada), applicable provincial legislative provisions and other applicable federal and provincial guidelines.

### **Obtaining Consent**

The knowledge and consent of the Plan member is required for the collection, use and disclosure of personal information, except in instances where the collection and disclosure of such information is required by law, pursuant to federal and/or provincial legislation and associated regulations or is a condition for membership in the Plan. The Capital Pension Plan shall make every effort to collect information directly from the Plan member or an authorized representative of the Plan member's current participating employer. Where required, information shall be collected through signed administrative forms supplied by the Plan administration or the Plan member's employer. Completion and submission of the signed form to the Plan Administration shall constitute consent for the use and disclosure of the provided information for approved purposes. The Plan member may withdraw their consent at

any time, except where the collection and disclosure of such information is required by the Plan for the provision of current and/or future benefits or where required by law. In certain circumstances, the disclosure of personal and confidential information to agents acting on behalf of individual Plan members (i.e. lawyers or financial planners) may be required. In these instances, express written consent is required from the individual Plan member prior to the disclosure of personal and confidential information to the agent. The Plan member may revoke this consent at any time.

### **Limiting Collection**

The Capital Pension Plan shall make every effort to collect information directly from the Plan member through signed administrative forms supplied by the Plan administration or the Plan member's employer. The Capital Pension Plan shall limit the collection of personal information to that which is necessary for identified purposes.

### **Limited Use, Disclosure and Retention**

The Capital Pension Plan shall not use or disclose personal and confidential information in its possession for any purpose other than those for which it was collected, except with the consent of the individual Plan member or as required by law. The Capital Pension Plan may disclose information to the Plan member, the Plan member's spouse as required by law, an authorized representative of the individual Plan member's current participating employer, an authorized third party for the provision of a service to the Plan administration or where required by law, and an authorized agent acting on an individual Plan member's behalf (with express written consent of the Plan member). The Plan shall keep personal information as long as it remains necessary or relevant for the identified purposes or as required by law. The Plan administration shall maintain reasonable and systematic controls, schedules and procedures for information and records retention and destruction which apply to personal information that is no longer necessary or relevant for the identified purposes. Authorized third parties providing services to the Plan Administration are required to use the provided information for the required purpose(s) only. Authorized third parties must provide documented confirmation of the destruction of personal information in their possession once the required services have been fulfilled.

### **Accuracy**

Personal information collected and maintained by the Plan shall be as accurate, complete and current as possible for the purposes for which it is used. The Capital Pension Plan updates personal information as required to fulfill the identified

purposes of upon notification by the Plan member. It is the responsibility of the individual Plan member to notify the Plan of any changes to personal information, including address changes and beneficiary updates. The Capital Pension Plan shall implement procedures to minimize the possibility that incomplete or outdated information may be used to make decisions by the Plan member.

### **Security Safeguards**

The Capital Pension Plan shall protect personal information by security safeguards appropriate to the sensitivity of the information. The Plan shall protect personal information against such risks as loss, theft, unauthorized access, disclosure, copying, use, modification or destruction. The Capital Pension Plan shall protect personal information disclosed to authorized third parties by contractual agreements and processes that ensure personal information is used only for the intended purpose and effectively deleted or culled once it is no longer required.

### **Openness**

Upon request, the Capital Pension Plan members may have access to specific information about the Plan's policies and practices pertaining to the management of personal information.

### **Individual Access**

Plan members may review their own personal information of record with the Plan upon request. The Capital Pension Plan shall promptly correct or complete any personal information found to be inaccurate or incomplete by the Plan member.

### **Challenging Compliance**

A Plan member may challenge the Plan's compliance with the above principles to the Pension Board by submitting a complaint to the Plan's Privacy Officer. The Privacy Officer shall investigate all complaints concerning compliance with these principles. If a complaint is found to be justified, the Plan shall take appropriate measures to resolve the complaint, including, if necessary, amending its policies and procedures. The individual will be notified of the outcome of the investigation regarding the complaint.