

UPP Member Privacy Statement

Effective Date: October 2025



The University Pension Plan Ontario ("**UPP**") is a jointly sponsored pension plan designed to enhance the long-term sustainability of university pension plans in Ontario.

We may make changes to this Member Privacy Statement from time to time, including as necessary to ensure that Personal Information is handled appropriately and in accordance with our policies and procedures, to reflect relevant changes in legislation, and to incorporate applicable guidance from regulators and other governmental authorities. Any changes we make will become effective when we post a modified version of the Privacy Statement on our Website. The "Effective Date" at the top of this Member Privacy Statement indicates when it was last updated.

1. Member Privacy Statement Scope and Application

This Member Privacy Statement applies to the Personal Information collected by UPP for purposes related to administering the UPP and your pension benefit, communicating with and serving you, or otherwise in accordance with your consent. This Member Privacy Statement applies to your interactions with us in relation to UPP, including when you access our website at www.myupp.ca, www.universitypension.ca or the myUPP Member Portal ("**Member Portal**") on which this Member Privacy Statement is posted (collectively, the "**Website**"), and when we administer your pension entitlement, the plan or otherwise provide services related to UPP (collectively, "**Services**").

2. Definition of "Personal Information"

"**Personal information**" is any information about an identifiable individual, including the information described in Section 4, below. It may also include more technical information, but only when this information can identify you as an individual. Information that is aggregated, anonymized, or de-identified and cannot be re-associated with an identifiable individual is not considered to be personal information.

3. How we Manage Consent

In becoming a UPP plan member, sending or responding to communications or otherwise submitting information to UPP in connection with using our Services, you are providing UPP with your consent to the collection, use and disclosure of Personal Information as set out in this Member Privacy Statement.

We will generally obtain consent when we want to use Personal Information for a new purpose or for a purpose other than those stated at the time of collection in this Member Privacy Statement.

Because participation in UPP is mandatory for full-time employees, and part-time employee members cannot withdraw from UPP once they have become eligible to participate, members cannot entirely withdraw from our collection, use and disclosure of their Personal Information for purposes related to plan administration.

If you decide to leave the plan following employment (for example, by transferring your lump sum entitlement into a locked-in RRSP) we will continue to collect, retain, use and disclose your Personal Information only as necessary for fulfilling our contractual obligations with participating employers to the extent permitted by applicable law, or as otherwise required or permitted by applicable law.

For those part-time employees who have elected not to participate in UPP, we retain certain Personal Information necessary for UPP to keep accurate records of that choice, or as otherwise required or permitted by applicable law.

Notwithstanding the above, all plan members may consent to and withdraw from the use of their Personal Information for non-mandatory purposes at any time.

For information on how to manage your preferences, please see Your Choices.

If you choose not to provide us with certain Personal Information, or if you withdraw your consent where such withdrawal is available, we may not be able to provide you with certain Services.

4. Personal Information we Collect

We limit the collection of Personal Information to what is required to fulfill the purposes set forth in the How we Use Personal Information section, or otherwise in accordance with your consent.

Personal information we collect may include:

- **Identifiers and contact information**, such as your name, employee number, email and postal addresses, telephone numbers, social insurance number and pension plan account number, and personal documentation, such as your birth certificate, driver's licence, passport, citizenship card, or marriage certificate (as applicable, where we need such documentation in order to verify certain information, we have otherwise collected from you);
- **Demographic information**, such as your sex assigned at birth, date of birth, marital status, and languages;
- **Financial information**, such as your salary, benefit amounts, tax information and banking information;
- **Plan administration information**, such as your membership status, the name of your employer, powers of attorney and other legal documents, and the names of your spouse, children or other beneficiaries;
- **Browsing activity on our Website**, such as pages and events viewed, clickstream data, online portal profile login events, opt-out preferences, and IP addresses (as further detailed in the How we Collect Personal Information section) if it can identify you as an individual. This is further described in the UPP Website Privacy Statement;
- **Any other information** you provide to us (as further detailed in the How we Collect Personal Information section).

5. How we Collect Personal Information

We collect Personal Information in a variety of ways, including: directly from you, from your employer, former employer and other third parties, and through online technologies (such as when you are interacting with us through our Website).

More specifically, we collect Personal Information in the following ways:

a) Directly From You

You may provide Personal Information to us by mail, by email, over the telephone, through our Website or in any other direct manner, for instance when you activate your access to the Website, send or respond to emails, respond to a survey, make an inquiry concerning your pension entitlement, or update your Personal Information through our Website.

b) From Your Employer, Your Former Employer and Other Third Parties

Your employer provides UPP with your Personal Information when you first become a member, such as your address, social insurance number, date of birth, and salary information. Thereafter, your employer provides us with information about your salary, contributions, and other applicable member events, such as leaves of absence, termination and retirement dates, and other information that UPP and employers must coordinate and share for the proper administration of employer retiree benefit programs, on a regular basis and as your circumstances change.

When you become a member, you provide your permission for your employer to release your Personal Information and share it with UPP in order to determine how to administer your pension entitlement and otherwise provide Services to you, and for UPP to obtain such Personal Information from your employer.

Where you transition between two employers that are both sponsors of UPP, you are also granting your permission for your former employer to release your Personal Information and share it with UPP in order to evaluate your eligibility for the plan.

We may also receive your Personal Information from other sources, such as your union, with your consent or when authorized by law.

c) Through Online Technologies

We may collect certain types of information electronically when you interact with our Website or through the use of our or a third party's technologies, which include cookies, web beacons or analytics services. This information supports the functioning of our Website and helps us understand what actions you take on our Website and whether our Website is working properly.

For more information, please refer to UPP's Website Privacy Statement.

6. How we Use Personal Information

We may use all categories of Personal Information detailed in Section 4 to provide you with Services or to communicate information that is beneficial or otherwise important to you, to manage the plan, to generally improve your experience with us, and as otherwise permitted or required by law.

We use your Personal Information for the following purposes:

a) Providing Services and Information

We use your Personal Information in a variety of ways in order to provide you with Services, including:

- Determining your eligibility for membership;
- Verifying your identity and your membership status;
- Calculating your benefits and options available to you;
- Responding to your inquiries, providing you with information about your pension entitlement or otherwise communicating with you;
- Creating, administering, and maintaining your pension entitlement;
- Actuarial valuations and plan performance; and
- Fulfilling your requests.

Below are some examples of how we use Personal Information about you:

- **Social Insurance Number** will be used for the purpose of reporting income and information on pension T- forms to the Canada Revenue Agency.
- **Salary** will be used to determine your average annual salary for pension calculations and to calculate contributions if you choose to buy back service in the plan.
- **Banking information** will be used for direct deposit of monthly pension benefits, or of lump sums where applicable, into your bank account.
- **Plan membership status** may be used in order to fulfil regulatory filing obligations, provide statements, undertake valuations of the plan.
- **Power of attorney and similar legal instruments** will be used to ensure that we have proper authorization to take instructions from and communicate with those that you designate as your authorized representative, legal guardian, appointed substitute decision maker, power of attorney or someone otherwise authorized by law, if necessary to administer the plan.

b) Managing our Operations

We use your Personal Information for the purpose of managing our operations, including:

- Notifying you of changes to your pension entitlement, your Member Portal profile or our Website services, terms, conditions or policies and to provide you administrative messages, updates, legal notices, technical notices or security alerts;
- Communicating with you in order to improve data quality (e.g., by requesting missing spousal or beneficiary information);
- Maintaining our Services;
- Deploying and managing our information technology applications and systems, including managing our Website; including managing and facilitating the use of our

Website, which may include using cookies and other similar technology (as further detailed in the UPP Website Privacy Statement);

- Maintaining the security of our users and our employees;
- Protecting ourselves and third parties from errors and fraud;
- Monitoring and investigating incidents and managing claims; and
- Meeting our contractual, legal and regulatory obligations.

c) Conducting Research, Surveys and Data Analytics

We may use your Personal Information in order to conduct research, undertake surveys and perform data analytics by analyzing current or previously collected information for the following purposes:

- Understanding member needs, preferences and behaviour, and customizing how we provide services to UPP members based on their needs and preferences;
- Managing, improving and developing our operations and our Services;
- Measuring the effectiveness of our methods for communicating with members, both individually and as a group; and
- Understanding how members and visitors interact with our Website, and ensuring it works correctly.

When possible, we will use your information in an aggregated, de-identified or anonymized format.

We may use Artificial Intelligence ("AI") tools to assist with our research, surveys and data analytics. Unless you provide your explicit consent for UPP to do so, these tools will only be used to analyze information in anonymized or de-identified form such as identifying common themes, general and aggregate member sentiment, or service trends and are not used to make decisions about individual members. All AI-assisted analysis is subject to human review and oversight, and is conducted only on platforms where Personal Information remains under the control of UPP or its authorized service providers, in compliance with our privacy requirements, contractual safeguards, AI governance requirements, and this Member Privacy Statement.

7. How we Share Your Personal Information

We may share your Personal Information with third parties and service providers (companies operating on our behalf) for the purposes described in this Member Privacy Statement and in accordance with applicable law. We will not share your Personal Information other than as provided in our Privacy Statements or as otherwise authorized or required by applicable law. We do not sell your Personal Information to any organization or person.

a) Third Parties

We may share your Personal Information with third parties when such disclosures are required in order to ensure proper administration of the plan or provide Services.

Below are some specific examples of how we share Personal Information about you with third parties:

- **With other plans** – your Personal Information may be shared with other pension plans if you transfer into the UPP plan from another pension plan. In the case of such transfers, you will be asked to authorize the collection, use and disclosure of your Personal Information by both the exporting plan and UPP, as required, for the purpose of facilitating such transfers.
- **With financial institutions** – your Personal Information may be shared with financial institutions, for example if you decide to transfer a lump sum entitlement into another permitted registered vehicle such as a locked-in RRSP or to commence pension payments.
- **With your legal representative** – your Personal Information may be disclosed to a legal guardian, appointed substitute decision maker, power of attorney or someone otherwise authorized by law, where such disclosure is necessary to administer the plan or your Services.
- **With medical advisors** – your Personal Information may be disclosed to medical advisors to assess your eligibility for disability benefits, and other plan options and features based on your medical condition.

Although we only share the Personal Information needed by such third parties to administer the plan or provide Services, once UPP shares such information with such organizations, it is no longer in the custody or under the control of UPP. Those organizations may use that information to contact you or for other purposes in accordance with their own privacy policies. UPP encourages you to review the privacy policies of the relevant organizations.

b) With your employer

UPP may share certain Personal Information with your employer where necessary to administer the pension plan or to support the administration of your employer's retiree benefit programs. This includes, for example, confirming plan membership status, or coordinating pension commencement and payment details. These disclosures may include information collected directly from you or from other sources, and are not subject to member opt-out.

Separately, UPP may also disclose limited Personal Information to your employer at their request, including to support workforce and succession planning, and to assist with the administration of employer-sponsored benefit program such as a bridge or supplementary retirement arrangement. UPP will only share information originally provided to UPP by your employer(s), or information derived from that information. This may include, for example: your hire date, plan enrolment date, total accrued service, early unreduced retirement date, and pension benefit amounts (including lump sum pension amounts, if applicable).

UPP does not disclose any information you provide directly to UPP to your employer, such as responses to inquiries, updates submitted by you through UPP's Member Portal, or communications with UPP member services, without your express consent.

Where these additional disclosures are not required to administer the plan or retiree benefits, you may opt out by contacting us as described in the "How to Contact Us" section of this Member Privacy Statement.

c) Service Providers

In the course of providing our Services, we may share one or more of the categories of Personal Information detailed in the section Personal Information we Collect with third-party service providers. These service providers help us operate and manage our technology systems, internal procedures, and infrastructure. They provide services to us such as evaluating plan

performance, sending emails and postal mail, data hosting, and analytics services. We require these service providers to limit their access to and/or use of Personal Information to what is required to provide their services, and to adhere to confidentiality obligations as well as security procedures and protections.

Below are some examples of third-party service providers with whom we share your Personal Information, and for what purposes:

- **Actuarial advisors** – used to perform a valuation of the plan.
- **Legal advisors** – used when legal consultation is required.
- **Mailing services** – used to send you statements and other communications about the plan and your benefits.
- **Survey services** – used to deliver or administer surveys relating to plan administration activities and to collect survey responses.
- **Hosting and IT service providers** – used to host the UPP Website that provides you with online access to your plan benefits and store information, including Personal Information, on our behalf.
- **Plan administrators** – used to assist UPP in the administration of pension entitlements.
- **Payroll providers** – used to provide UPP with services related to plan benefit payments and other disbursements.
- **Your employer, acting as our agent** – We may engage the member institutions of UPP to act as service providers for the collection and processing of certain information for UPP, either temporarily or on an ongoing basis. For example, a university institution currently administering an online portal for plan members to access information and manage benefits may continue to provide this service as our agent.
- **Artificial Intelligence Providers** - we may share Personal Information with third-party service providers that use AI tools to support Service delivery. Unless you explicitly consent otherwise, any such use is limited to anonymized or de-identified data, and AI tools are not used to make decisions about individual members. Personal information remains under UPP's control and is subject to strict contractual and privacy safeguards.

d) Transfer of Operations or Activities

We may decide to transfer all or part of our operations, assets or activities to a third party, to merge with another entity, or to engage in another form of transaction. If your Personal Information is required in connection with any such events, we will comply with the legal requirements for the disclosure of Personal Information and ensure that the handling of your Personal Information complies with all applicable privacy legislation.

e) Other Permitted Reasons

Applicable laws may permit or require the use, sharing, or disclosure of Personal Information without consent in specific circumstances (e.g., to satisfy reporting obligations, when investigating and preventing suspected or actual illegal activities, including fraud, or to assist government and law enforcement agencies).

These circumstances include situations when permitted or required by law or when necessary to fulfil UPP's legal obligations, protect UPP, our employees, those receiving our assistance, or

others. For example, we are obliged by tax laws to report certain Personal Information to the CRA.

Where such circumstances arise, we will not share more Personal Information than is reasonably required to fulfill that particular purpose.

f) With Your Consent

Other than the purposes listed above, we may, with your implied or express consent, share or disclose your Personal Information outside of UPP, in accordance with applicable laws.

8. Third Parties

Third parties that you connect with directly through hyperlinks or other information provided on our Website may link and combine information about you to other Personal Information they may have collected on you, to achieve their own goals and purposes. We do not collect, use or disclose such information, which is subject to the privacy policies of the third-party organization. UPP encourages you to review the privacy policies of such organizations as well. For more information see the UPP Website Privacy Statement.

9. How we Store and Safeguard Personal Information

We take the security of your Personal Information very seriously and are committed to protecting your privacy by using a combination of administrative, physical, and technical safeguards. While we endeavour to keep your Personal Information within Canada, your Personal Information may be stored in foreign jurisdictions, in which case it may be subject to foreign laws. We store your Personal Information for as long as it is necessary to provide you with our services and for a reasonable time thereafter, or as permitted or required by law.

Learn more about how we protect Personal Information, where we keep information and cross-border transfers, and how long we retain your information.

a) How we Protect Personal Information

We employ organizational, physical and technological measures to protect the confidentiality of Personal Information and to safeguard Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification, in light of, among other things, the sensitivity of the information and the purposes for which it is to be used. These safeguards also apply when we dispose of or destroy your Personal Information.

b) Where we Keep Personal Information and Cross-border Transfers

While we endeavor to keep your Personal Information within Canada, it is not always possible to ensure or require that UPP and its service providers access, store or process your Personal Information entirely within Canada. We use reasonable safeguards to ensure that we, and our service providers, protect your Personal Information wherever it is used or stored.

As a result, when your Personal Information is used or stored in a jurisdiction other than where you are residing, it may be subject to the law of this foreign jurisdiction, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction.

c) Retention

We will store your Personal Information for as long as necessary to fulfill the purposes for which it was collected, except where otherwise required or permitted by law. Once no longer required,

your Personal Information will be securely destroyed or anonymized (so the information no longer identifies you).

10. Accessing and Correcting Your Personal Information

You have the right to access and correct the Personal Information we hold about you, subject to limited exceptions that may apply under applicable laws. Upon your request, we will provide you with access to your Personal Information within a reasonable timeframe, in compliance with applicable laws. It is your responsibility to provide accurate, correct and complete information.

You can request access or rectification by contacting us as described in the “How to Contact Us” section.

11. How to Contact Us

If you have any questions or concerns about how we handle your Personal Information, please contact us as indicated below. If your use of one of our Services involves a third party, the third party may hold your Personal Information. In this case, we will direct you to the appropriate party so that you may make enquiries as to that party's privacy policies and practices.

Toll-free number: 1-866-781-5012

Address: P.O. Box 11017, Toronto, Ontario. M1E 1N0 Canada

Email: privacy@universitypensionplan.ca