

UPP Member Privacy Statement



Effective Date: October 2026

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 change this Member Privacy Statement from time to time, including to ensure that Personal Information is handled appropriately and in accordance with our policies and procedures, reflect changes in legislation, and incorporate applicable guidance from regulators and other government authorities. Any changes will take effect when we post a modified version of the Member 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 UPP and your pension benefit, communicating with and serving you, or otherwise in accordance with your consent. It applies to your interactions with us in relation to UPP, including when you access our Website at www.myupp.ca, www.universypension.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 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 technical information, but only when it can identify you as an individual. Information that is aggregated or 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

By becoming a UPP member, sending or responding to communications, or otherwise submitting information to UPP in connection with the Services, you consent to UPP's collection, use, and disclosure of Personal Information as described 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 become eligible to participate, members cannot entirely withdraw from our collection, use, and disclosure of their Personal Information for purposes related to administering UPP.

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

Despite the above, UPP members may consent to or withdraw consent 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 our collection of Personal Information to what is required for the purposes described 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, pension plan account number, and personal documents, such as your birth certificate, driver's licence, passport, citizenship card, or marriage certificate (where applicable and required to verify 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), where that activity or information can identify you. This is further described in the UPP Website Privacy Statement;
- **Communications with UPP**, such as written correspondence, recordings, transcripts, and the substance of your interactions with us;
- **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 interact 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, email, telephone, through our Website, or by any other direct means, including when you activate access to the Website, send or respond to emails, respond to a survey, make an inquiry about your pension entitlement, or update your Personal Information through our Website. When you contact us by telephone or otherwise interact with us, the interaction may be recorded and/or a transcript may be generated using artificial intelligence.

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 our or a third party's technologies, including cookies, web beacons, and analytics services. This information supports the functioning of our Website and helps us understand what actions you take on it and whether it is working properly.

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

6. How We Use Personal Information

We may use all categories of Personal Information described in Section 4 to provide Services, communicate information that is beneficial or important to you, administer UPP, 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 to provide 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:

- **Your social insurance number** will be used to report income and information on pension T-forms to the Canada Revenue Agency.
- **Your 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 UPP.
- **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 to fulfill regulatory filing obligations, provide statements, and undertake valuations of UPP.
- **Powers of attorney and similar legal instruments** will be used to confirm that we are authorized to take instructions from and communicate with your authorized representative, legal guardian, appointed substitute decision-maker, person acting under a power of attorney, or other person authorized by law, where necessary to administer UPP.

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, our Website or Services, or applicable terms, conditions, or policies, and providing 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 our Website and the cookies and similar technologies used on it (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 to conduct research, administer 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 members based on their needs and preferences;
- Managing, improving, and developing our operations and Services;
- Measuring the effectiveness of communications with members, individually and collectively; and

- Understanding how members and visitors interact with our Website and ensuring that it works correctly.

Where appropriate for the purpose, we may use information in an aggregated, anonymized, or de-identified form.

d) Improving Service Delivery with Artificial Intelligence

UPP and our service providers may use artificial intelligence ("AI") to help deliver and improve our Services. For example, AI may help us organize information, improve its quality, manage workflows, protect our information and systems, and understand members' feedback and experiences.

We use only AI tools that UPP has reviewed and approved. Our agreements require service providers to protect your Personal Information and keep it confidential.

UPP reviews how AI is used with Personal Information and oversees that use on an ongoing basis. This includes considering the purpose of the use, the information involved, the accuracy of AI-generated results, and when a person needs to review them. While UPP uses AI to help with delivering our Services to you, qualified persons oversee pension benefit decisions.

7. How We Share Your Personal Information

We may share your Personal Information with third parties and service providers acting 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 except as described in this Member Privacy Statement or the UPP Website Privacy Statement, or as otherwise authorized or required by 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 required to administer UPP properly 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 UPP from another pension plan. For 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, to facilitate the transfer.
- **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, person acting under a power of attorney, or other person authorized by law when necessary to administer UPP or provide Services to you.
- **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.

We share only the Personal Information that third parties need to administer UPP or provide Services. Once UPP shares information with these organizations, however, it is no longer in UPP's custody or control. Those organizations may use the information to contact you or for other

purposes in accordance with their 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 when necessary to administer UPP or support the administration of your employer's retiree benefit programs. This may include confirming your membership status and coordinating pension commencement and payment details. These disclosures may include information collected directly from you or other sources and are not subject to member opt-out.

Separately, UPP may disclose limited Personal Information to your employer at its request, including to support workforce and succession planning and assist with the administration of employer-sponsored benefit programs, such as bridge or supplementary retirement arrangements. UPP will share only 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 information you provide directly to UPP to your employer, such as responses to inquiries, updates submitted through the 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 Services, we may share one or more categories of Personal Information described in the Personal Information We Collect section with third-party service providers. These providers help us operate and manage our technology systems, internal procedures, and infrastructure, and provide services such as plan performance evaluation, email and postal delivery, data hosting, and analytics. We limit their access to and use of Personal Information to what is required to provide services to UPP, and require them to comply with confidentiality obligations, security procedures, and safeguards.

Below are examples of third-party service providers with whom we share your Personal Information and the purposes for which we share it:

- **Actuarial advisors** – used to perform a valuation of UPP.
- **Legal advisors** – used when legal consultation is required.
- **Mailing services** – used to send you statements and other communications about UPP and your benefits.
- **Survey services** – used to deliver or administer surveys relating to UPP administration and collect survey responses.
- **Hosting and IT service providers** – used to host the UPP Website, provide online access to your UPP 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 services related to UPP 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 service providers that provide AI-enabled technologies or related services on UPP's behalf. For more information about how we use AI and protect your Personal Information when using AI, see "Improving Service Delivery with Artificial Intelligence", above.

d) Transfer of Operations or Activities

We may decide to transfer all or part of our operations, assets, or activities to a third party, merge with another entity, or enter into another form of transaction. If your Personal Information is required in connection with such a transaction, we will comply with applicable legal requirements for its disclosure and handling.

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 fulfill UPP's legal obligations or protect UPP, our employees, those receiving our assistance, or others. For example, tax laws require or permit us 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-Party Websites and Links

Third parties that you access directly through hyperlinks or other information on our Website may link or combine information about you with other Personal Information they have collected for their own purposes. UPP does not collect, use, or disclose that information, which is subject to the third party's privacy policy. UPP encourages you to review the privacy policies of these organizations. 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 seriously and protect your privacy through administrative, physical, and technical safeguards. While we endeavour to keep your Personal Information within Canada, it may be stored in foreign jurisdictions and may therefore be subject to foreign laws. We store your Personal Information for as long as necessary to provide 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 manage cross-border transfers, and how long we retain information.

a) How We Protect Personal Information

We use organizational, physical, and technological measures to protect the confidentiality of Personal Information and safeguard it against loss, theft, and unauthorized access, disclosure, copying, use, or modification. These measures take into account the sensitivity of the information and the purposes for which it is used. They also apply when we dispose of or destroy Personal Information.

b) Where We Keep Personal Information and Cross-Border Transfers

While we endeavour to keep your Personal Information within Canada, we cannot always ensure that UPP and its service providers access, store, or process it 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.

When your Personal Information is used or stored in a jurisdiction other than the one in which you reside, it may be subject to that jurisdiction's laws, including laws permitting or requiring disclosure to governments, government agencies, courts, and law enforcement authorities.

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 it is no longer required, we will securely destroy or anonymize it so that it 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 under applicable laws. Upon request, we will provide access to your Personal Information within a reasonable timeframe and in accordance with applicable laws. You are responsible for providing accurate 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