

## UPP Privacy Statement

Effective Date: February 15, 2021

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

Your privacy is important to University Pension Plan Ontario (“UPP”, “we”, “us” or “our”). This UPP Privacy Statement (“Privacy Statement”) applies to our activities and describes our practices with respect to the collection, use and disclosure of personal information, as well as any rights you may have with respect to your personal information (as defined in the [Definition of “Personal Information”](#) section).

We may make changes to this 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, and to reflect relevant changes in legislation and 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. If the changes we make are significant, we will provide a more prominent notice as required by applicable laws. The “Effective Date” at the top of this Privacy Statement indicates when it was last updated.

### **1. Privacy Statement Scope and Application**

This 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 Privacy Statement applies to your interactions with us in relation to UPP, including when you access our website at [www.universitypension.ca](http://www.universitypension.ca) or an online account access portal on which this 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. This may include, for example, your name, home address, contact information, email address, and information relating to your pension entitlement with us. It may also include more technical information, but only when this information can identify you as an individual. Information that is aggregated and/or de-identified and cannot be 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 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 Privacy Statement.

Because participation in UPP is mandatory for full-time employees, and part-time employee members cannot withdraw from UPP once they have elected 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, 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 biological sex, gender identifier, 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;
- **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.

You may delete or disable certain of these technologies at any time, via your browser or by other means depending on the method of collection used. However, if you do so, you may not be able to use some of the features on our Website. To learn more about the choices available to you, please see [Your Choices](#).

## 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.

Learn more about how we use your personal information for: [providing services and information](#), [managing our operations and the plan](#), and [conducting research, surveys and data analytics](#).

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 online 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 [How we Collect Personal Information](#) section);
- 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 and/or de-identified format.

## 7. How we Share 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 Privacy Statement and in accordance with applicable law. We will not share your personal information other than as provided in this Privacy Statement or as otherwise authorized or required by applicable law. We do not sell your personal information to any organization or person.

Learn more about how we may share personal information: with [third parties](#), with [service providers](#), in the course of a [transfer of operations or activities](#), for [other permitted reasons](#), and [with your consent](#).

### 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.
- **With your employer** – personal information may be shared with your employer to provide you with Services and for the proper administration of the employer's retiree benefit programs.

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. 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.

## c. 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.

## d. 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.

#### **e. 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.

### **9. Your Choices**

We want you to clearly understand your choices and make informed decisions about your privacy and communications options. There are several options available for you to manage your preferences, including, for example: managing your preferences within your online portal profile, where this functionality is provided; [contacting us directly](#); [changing your browser settings](#) and, where available, using [third party functionality](#).

#### **a. Contacting Us Directly**

From time to time, we may communicate information to you about the plan, for example through newsletters or annual reports.

You may opt out of receiving non-mandatory communications by contacting us directly using the contact details provided in the section [How to Contact Us](#) below, or by using the unsubscribe mechanism provided if it is an electronic communication. Please note that, even if you have opted out of receiving non-mandatory electronic communications from us, we may still contact you for certain purposes, in compliance with applicable laws (e.g., for service or reminder notices related to the administration of your account or the plan). We may also need to contact you with

questions or information regarding your customer service inquiries. Please be advised that it may take some time for

all of our records to reflect changes in your preferences (e.g., if you request that you not receive non- mandatory electronic communications from us, your preference may not be captured for a newsletter distribution already in progress).

Please also note that we are obliged to communicate certain information to all members, such as annual statements, notices concerning plan amendments and notices of retirement options. You may choose to receive such mandatory information either electronically or via post mail, by calling or writing to us. However, owing to the abovementioned legal obligations, you will not be able to opt out of receiving such communications altogether regardless of your opt-out preferences.

#### **b. Changing Browser Settings**

Web browsers generally allow control of cookies through the browser settings. You can, for example, disable cookies, or set your browser to notify you each time you receive a cookie, allowing you to decide if you want to accept it or not. Please note that if you do not accept a particular cookie, certain elements or features of our Website may not function correctly or completely.

#### **c. Using Third Party Functionality**

We may use the services of third parties that provide certain technologies to analyze your browsing behaviour as you visit our Website, such as Google Analytics. [Learn about how Google uses your information](#). You can manage your privacy preferences with respect to such third parties by using functionality provided within their platforms, or by disabling cookies when you visit our Website. Please note that if you disable, block or delete some of these technologies, such as cookies, certain elements or features of our Website may not function correctly or completely.

### **10. 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 endeavor 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).

**11. 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.

**12. 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

**Through this webpage:** [www.clearviewconnects.com](http://www.clearviewconnects.com)

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