

Job Applicant Privacy Statement

Effective Date: December 2024



Introduction

The University Pension Plan Ontario (“**UPP**”, “**we**”, “**us**” or “**our**”) is a jointly sponsored pension plan designed to enhance the long-term sustainability of university pension plans in Ontario.

We may make changes to our Privacy Statements 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 incorporate any 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” indicates when it was last updated.

The UPP Privacy Statement for Job Applicants (“**Job Applicant Privacy Statement**”) applies to our recruitment and hiring activities and describes UPP’s practices with respect to the collection, use and disclosure of Personal Information in the course of those activities, as well as any rights you may have with respect to your Personal Information (as defined in the Definition of “**Personal Information**” section).

Privacy Statement Scope and Application

This Job Applicant Privacy Statement applies to the Personal Information collected by UPP for purposes relating to considering or recruiting you for current and potential employment opportunities at UPP, including assessing your skills, qualifications, and interests for the purposes of determining your suitability for a position, communicating with you about the foregoing, or otherwise using your Personal Information in accordance with your consent. This Job Applicant Privacy Statement applies to your interactions with us in relation to UPP during the recruitment process, including when you access our website at www.myupp.ca, through third parties (e.g. LinkedIn) or an online account access portal on which this Job Applicant Privacy Statement is posted (collectively, the “**Website**”).

Definition of “Personal Information”

The types of Personal Information we collect will depend on what you choose to provide us, but typically include:

- The contact information you provide or make available, your status as a candidate and the status of your application, and the role(s) you may be interested in or suited for;
- Your skills, experiences, certifications, work and education history, and any similar content usually found in an application package or resume; and
- Data including demographic and accommodation information, as further detailed in the “Equity, Diversity, and Inclusion” section, below.

How we Manage Consent

In, providing an application to UPP for employment, sending or responding to communications regarding your application, or otherwise submitting information to UPP in connection with such application, you are providing UPP with your consent to the collection, use and disclosure of Personal Information as set out in this Job Applicant Privacy Statement.

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

How we Collect Personal Information

We collect Personal Information in a variety of ways, including: directly from you, from your former employer and other third parties (e.g. background check services), and through online technologies.

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

Directly From You

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

As Part of the Interview Process

When interviewing for a position with UPP, you may provide information to UPP regarding your job experience, qualifications, or other relevant matters. This information may be recorded by UPP and retained as part of your application package.

Through Recruitment Firms

UPP may use third party recruitment agencies to find suitable candidates for job vacancies. As part of this process, recruiters may gather Personal Information about you that you have posted publicly (e.g. LinkedIn) or may approach you directly. The Personal Information gathered by the recruiter may then be provided by UPP when UPP is considering whether to interview you as a job candidate.

Through Online Technologies

We may collect certain types of information, including some Personal Information, electronically when you interact with our Website or through the use of our or a third party's technologies (e.g. Ceridian Dayforce, your institution's career portal, through recruiting organizations to which you've provided your information, or LinkedIn).

How We Use Your Personal Information

Recruitment and Candidate Evaluation

We collect and use Personal Information for the purposes of considering or recruiting you for current and potential employment opportunities at UPP, including assessing your skills, qualifications, and interests for the purposes of determining your suitability for a position. This includes communicating with you about positions that are available, your status as a candidate, or the hiring process.

Your Personal Information will be included in your employment records if you become our employee.

As part of considering you for current employment opportunities, we will use your information to administer recruitment processes, communicate with you, confirm your eligibility to work, and conduct background and reference checks. If you have opted to subscribe to UPP's hiring updates, you can always choose to unsubscribe or opt-out from those communications.

Equity, Diversity, and Inclusion

If you choose to provide us data including demographic and accommodation information, such as your gender identity, nationality, indigenous status, pronouns, sex, race, ethnicity, disabilities, sexual orientation, or other similar information, we may use such information for the purpose of supporting our equity and diversity initiatives and similar special programs, including measuring our progress in achieving our diversity, equity and inclusion objectives.

Providing this information is completely voluntary, and will always be used in a manner consistent with applicable law.

AI Assisted Recruitment

From time to time, UPP or our service providers may use Artificial Intelligence (“AI”) based tools to help us streamline and enhance our talent management practices and processes. For example, these tools may help by highlighting certain candidates or positions based on the perceived match between them and UPP's needs and objectives.

These tools may also help inform our search for candidates. These tools operate based on substantive content included in resumes or other available Personal Information about a candidate. UPP is committed to the ethical use of your Personal Information and has robust oversight for the use and development of these tools.

UPP evaluates all AI tools for their appropriateness, including by considering the sensitivity of the Personal Information processed by these tools, the impact on the rights and obligations of individuals, and the potential for bias in the tools if they are being used to assist in decision making. Our use of AI does not replace human decision-making, nor does it filter out any candidate or potential opportunity.

Conducting Research, Process Improvements, and Surveys and Data Analytics

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

- Manage accommodation requests you submit;
- Conduct analytics to identify means of improving our talent management practices, processes and tools (including AI-based tools), address skill gaps, and effectively build our talent pool;
- Managing, improving and developing our recruitment operations, including to support our equity and diversity initiatives and similar special programs;
- Meet our legal obligations and comply with internal UPP policies;
- Protect us and our stakeholders, including our property, rights, and legal interests;
- Measuring the effectiveness of our methods of our recruitment procedures; and
- Understanding how applicants interact with our or our third party's website(s) and ensuring it works correctly.

When possible and appropriate, we will use your Personal Information in an aggregated, de-identified, or anonymized format.

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 Job Applicant Privacy Statement and in accordance with applicable law. We will not share your Personal Information other than as provided in this Job Applicant Privacy Statement or as otherwise authorized or required by applicable law. We do not sell your Personal Information to any organization or person.

Third Parties

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

- General information about your employment to your institution (e.g. your university) as part of their career-office activities;
- To external search firms which you have worked with as part of your application;
- governmental, regulatory, or law enforcement authorities, in response to a legitimate request for information; and
- otherwise authorized or required by law.

When sharing information with third parties, UPP takes appropriate contractual and operational steps to ensure the Personal Information is protected and used only in accordance with the purposes set out in this Job Applicant Privacy Statement.

Service Providers

UPP may share one or more of the categories of Personal Information detailed in the section “Personal Information we Collect” with third party service providers as part of UPP’s recruitment activities. These service providers help us operate and manage our technology systems, and assist UPP in finding suitable candidates.

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

- Entities or individuals that are conducting your background and reference checks;
- Certain technology sub-processors to facilitate the application process (e.g. DocuSign);
- LinkedIn or other platforms when we identify you as a candidate or you apply for a role with us through the platform; and
- Any third party to the extent we deem necessary to meet our legal obligations, or protect us, our property, rights, or interests.

Some parties that we share your Personal Information with may be located, or may store Personal Information, outside of Canada. Personal Information stored in other countries may be subject to the laws of those countries.

We perform privacy and security due diligence in respect of all third parties that are engaged to provide services to us. The purpose of this exercise is to determine whether a prospective third-party service provider maintains the administrative, technical and physical measures to protect your Personal Information.

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.

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

How We Protect Your Personal Information

We use safeguards designed to protect your Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use or modification. Below are some examples of how we protect your Personal Information:

- **Administrative** –access to Personal Information is limited to UPP employees, contractors, or other parties on a “need to know” basis as required for their business functions, and employees are trained on our privacy practices.
- **Technical** –industry standard firewalls, data encryption, multi-factor authentication, and information access authorization controls are used to prevent unauthorized access to information.
- **Physical** –production of hard copy documents containing Personal Information is discouraged and limited to legitimate business functions. Any hard copy documents containing Personal Information are expressly labeled as containing Personal Information and stored in locked filing cabinets that have restricted access. Documents are shredded or otherwise destroyed when no longer needed.

Safeguards are periodically reviewed to ensure they continue to be appropriate in protecting your Personal Information.

We'll never send you unsolicited email requests for Personal Information. Should you ever receive a suspicious email that looks to be from us, don't click on it and contact us immediately at privacy@universitypensionplan.ca.

Websites Outside UPP Control

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.

Your Choices

You may opt out of receiving 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, or by letting the individual at UPP with whom you're corresponding know you'd like to opt-out.

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).

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.

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.

Accessing Your 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.

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

Retention of your Personal Information

We will retain your Personal Information for a reasonable period after our relationship with you as a candidate, including as required by the Employment Standards Act. We retain this information for legal and practical reasons, including in case of a legal challenge and to help us better understand, analyze and improve our recruitment process, and other purposes identified in this Job Applicant Privacy Statement.

If you're offered and accept employment with us, some of the Personal Information collected during recruitment process will become part of your employment record. In these cases, we'll retain Personal Information as necessary for as long as you're an employee and for a reasonable period thereafter.

Under some circumstances we may anonymize your Personal Information so that it can no longer be associated with you. We reserve the right to use such anonymous data for any legitimate business purpose and as permitted by law without further notice to you or your consent.

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

By emailing: privacy@universitypensionplan.ca