

# Website 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.

## Privacy Statement Scope and Application

This Website Privacy Statement applies to the collection, use, storage, and disclosure of Personal Information by and for the website visitors accessing our website at [www.myupp.ca](http://www.myupp.ca) (the “Website”).

## Definition of “Personal Information”

“**Personal Information**” is any information about an identifiable individual. This may include, for example, your name, address, phone number, email address, age, gender identity, opinions and preferences, as well as Internet Protocol (“IP”) address. It may also include more technical information, but only when this information can identify you as an individual. For more information see the “Personal Information we Collect” section.

## How we Manage Consent

By using the Website, you agree to the collection, use, and disclosure of your Personal Information as described here. Our legal basis for processing your information is typically your consent, though we may also rely on compliance with legal obligations.

You can withdraw your consent at any time by not using the Website, or by contacting UPP as set out below. This might affect the level of service we provide on the Website. You can also block web technologies on our site, but this may limit Website functionality. See Cookies below for more information. Erasure requests of your data can be made by phone or email.

## Personal Information we Collect

The type of Personal Information we collect as part of your access to the Website may include:

- Personal Information you choose to provide us in submitting any forms on the Website;
- Technical information, including your IP address, your device, your browser, operating system, and the website URL referring you to our Website or how you otherwise arrived on the Website;

- Information inferred through your browsing behaviour using Google Analytics, which may include inferences about your age, gender, interests, your geographic location, language(s) spoken;
- Real time information about how users are interacting with our Website; and
- Behavioural information about your interactions with the Website, including clicks, downloads, and form submissions.

## How we Collect Personal Information

We may collect information electronically when you interact with our Website using cookies, web beacons, or analytics services including Google Analytics. This information helps our Website function and lets us understand your actions and whether the Website is working properly.

We may also collect information from you when you contact us through the Website. However, any information you provide through the Member Portal are governed by the Member Privacy Statement.

When you access the Website, it collects data on the pages you view, the links you click, and other actions you perform.

You can delete or disable these technologies via your browser or other methods, but doing so may limit some Website features. For more details, refer to Your Choices.

## How we Use Personal Information

We use all categories of Personal Information described in the “Personal Information we Collect” section to provide services, share important information, manage plans, and improve your experience, as permitted by law.

We may also use your Personal Information for research, surveys, and data analysis to:

- Understand member needs and preferences;
- Customize our services for UPP members;
- Improve and develop our operations and services;
- Measure the effectiveness of our communication methods;
- Understand how users interact with our website; and
- Whenever possible, we will aggregate or de-identify your information.

We may also collect information from you when you contact us through the Website. However, any information you provide through the Member Portal are governed by the Member Privacy Statement.

When you access the Website, it collects data on the pages you view, the links you click, and other actions you perform.

You can delete or disable these technologies via your browser or other methods, but doing so may limit some Website features. For more details, refer to the Your Choices section.

## How we Share Your Personal Information

### (a) With Service Providers

We may share your Personal Information with third parties and service providers (companies operating on our behalf) for the purposes described in this Website Privacy Statement and in accordance with applicable law. We do not sell your Personal Information to any organization or person.

In the course of providing our Services, we may share one or more of the categories of Personal Information detailed in the “Personal Information we Collect” section with third party service providers. These service providers help us operate and manage our Website. This can occur where UPP engages those service providers to manage the website on our behalf, or where UPP uses software tools from those service providers to manage the Website directly.

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 may share your Personal Information, and for what purposes:

- **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
- **Website Managers** – service providers that help update or manage the Website.
- **UPP’s Auditors or Professional Advisors** – to ensure, for example, that the use of Personal Information adheres to what is set out in this Website Privacy Statement, or to obtain legal or operational advice.

### (b) Other Permitted Reasons

Applicable law 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).

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

### (c) 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.

## 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.

## Cookies

UPP's website uses cookies and similar technologies to analyze performance and functionality. This includes pages visited, browser type, encryption level, and visitors' IP addresses. UPP also collects information on online activities and preferences. Examples include:

- Web pages visited;
- Length of visits;
- Successful downloads of any resources;
- How you interact with our website functions and features;
- How you arrived on the Website;
- Geographic and location information;
- Your device information;
- The time and date of your visits to the Website; and
- Error and performance logging.

This information is utilized to assist UPP in understanding visitor interests, preferences, and needs, thereby providing a customized online experience and introducing new tools and website functions. Although UPP does not sell your Personal Information to other organizations or individuals, certain analytics tools may monitor user internet behavior, which could lead to internet-based advertising.

You can block, delete, or disable these technologies if your device allows. Check your browser settings to manage cookies. For instance, you can opt out of tracking by Google Analytics or Adobe Analytics.

Blocking cookies or similar technologies may limit access to some site features, services, applications, or tools.

## 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 to block tracking or other functionality.

### **(a) 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.

### **(b) 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 our web-host provider and Google Analytics. [Learn about how Google uses your information](#) and how [Google safeguards 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.

## 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. Where your Personal Information is stored by a third-party acting on our behalf, we take appropriate contractual measures to protect and limit the use of that information.

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**

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, the Personal Information described in this Website Privacy Statement will be securely destroyed.

## 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, and where technically feasible, 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.

## 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](mailto:privacy@universitypensionplan.ca)