## **BOARD OF TRUSTEES**

# BOILERMAKERS LODGE 359 PRODUCTION WORKERS PENSION PLAN PRIVACY POLICY

# HOW THE PLAN COLLECTS, USES AND DISCLOSES PERSONAL INFORMATION

#### WHAT INFORMATION DO WE KEEP?

We collect and store non-public personal information. It comes from a variety of sources such as the applications or other forms that you complete (for example, your name, your Social Insurance number, and your address), from your employers, or from correspondence with you and service providers you have engaged to provide medical or other benefits. We collect only the information we need for the purpose of providing and servicing retirement programs we administer on your behalf.

In order to provide certain benefits, we may be required by legislation (such as the *Pension Benefits Standards Act* of B.C.) to collect and store your Social Insurance Number.

We do not sell your personal information.

#### WHY DO WE NEED THE INFORMATION?

We need to collect personal information to:

- determine your eligibility for benefits;
- administer and adjudicate your benefits;
- determine the cost and financially manage these programs; and
- meet regulatory or contractual requirements relating to the benefits and related services provided to you.

We will make sure you understand why we need the information by using clear, understandable language in describing the purpose.

## **WE WILL OBTAIN YOUR PERMISSION**

We collect, use or disclose your personal information with your permission. Your permission may be expressed in writing or be implied and you may give it to us verbally, electronically, or through your authorized representative.

With reasonable notice, and subject to legal and contractual restrictions, you may withdraw your permission to collect, use and disclose your personal information at any time.

We will obtain your consent to collect or release medical information about you. Before we make information available to third parties, other than an agent or authorized service provider who needs it, we will tell you at the time we obtain your consent or before we make the information

available, who those persons or organizations are, the kind of information we want to share with them and why.

Of course, you can choose not to provide us with some or all of your personal information. However, this choice may hinder our ability to adjudicate any claims you have for benefits to which you may be entitled.

## HOW LONG DO WE KEEP INFORMATION?

We will keep your personal information as long as it is necessary, or as required by law. When personal information records are destroyed, we will use appropriate safeguards to prevent unauthorized parties from gaining access to the information during the process.

## PROTECTION OF YOUR PERSONAL INFORMATION

#### **WE ARE RESPONSIBLE FOR YOUR INFORMATION**

We are responsible for all personal information in our possession, including information transferred to a third party service provider or agent so that we can provide you with benefits and related services.

#### HOW WE PROTECT INFORMATION

Only D.A. Townley & Associates Ltd's (the Plan Administrator) employees, the Trustees of the Plan, the Plan sponsor, agents and authorized service providers who need the information in order to do their jobs may access your personal information. Where possible, when we provide information to third parties, we attempt to eliminate any references that allow identification of the individuals. We require all employees, agents and authorized service providers to comply with this Privacy Policy.

We have developed and are continuing to enhance security procedures to safeguard and protect personal information against loss, theft, unauthorized disclosure, copying, and unauthorized use or modification. We will maintain appropriate safeguards and security procedures that reflect the types of documents, including electronic or paper records, organizational measures including security clearances and limiting access on a "need-to-know" basis, and technological measures such as the use of passwords and encryption. While we endeavour to protect all information, the most sensitive information, such as medical information, receives the highest level of protection.

For telephone inquiries to the Plan's Administration staff, the information provided varies based on the relationship of the person making the inquiry to the Plan Member (e.g. authorized service provider, Plan Member, or dependent). After the caller has been screened for appropriate identification, only information pertaining to the specific claim, treatment, or benefit in question is shared.

## **ACCESSING YOUR PERSONAL INFORMATION**

#### Your rights

You have the right to ask whether we hold any personal information about you. You have the right to see that information, as provided by law. Where we have obtained medical information about you from a third party, we will release this information only through your permission.

You also have the right to know:

- how we collected your personal information;
- how we are using it; and
- to whom it may have been disclosed.

# **HOW TO REQUEST AN UPDATE OR CORRECTION**

If you believe any of the information we have collected about you is incorrect or incomplete, you have the right to ask us to change it.

You may make a request to change the Plan's records about you by writing to our Privacy Officer, at:

Attention: Privacy Officer
Boilermakers Lodge 359 Production Workers Pension Plan
101 – 4190 Lougheed Highway
Burnaby, British Columbia
V5C 6A8

If you show that your personal information is inaccurate or incomplete, we will make the necessary changes, and where appropriate, we will contact any third parties with which this information has been shared.

# **HOW TO REGISTER COMPLAINTS**

If you feel we have not dealt with your request to your satisfaction, you may register a privacy-related complaint by contacting the Plan's Privacy Officer. We will explain our complaint procedure to you and investigate all complaints.

If a complaint is justified, the Trustees will take all appropriate steps to set the situation right, including changing our policies and practices if necessary. We will also let you know what other complaint procedures may be available to you.

We reserve the right to revise our privacy policy as needed. If changes are made, the new policy can be obtained by contacting the Plan's Privacy Officer.

# FOR MORE INFORMATION

For more information, please contact our Privacy Officer at 604-299-7482 (if you are located outside the Lower Mainland of British Columbia, call 1-800-663-1356).