

## PRIVACY POLICY

### Purpose

The Public Service Superannuation Plan Trustee Inc. is committed to taking all reasonable steps and precautions to protect the privacy of all members, retirees, and beneficiaries whose Personal Information is under the administration of PSSPTI. PSSPTI will adhere to the privacy protection provisions of applicable legislation relating to the collection, use, disposal, storage and disclosure of Personal Information. PSSPTI utilizes as a guideline, the principles established within the Canadian Standards Association Model Code for the Protection of Personal Information supported by the Personal Information Protection and Electronic Documents Act ("PIPEDA").

The PSSPTI is dedicated to the protection of Personal Information and recognizes the requirement to protect confidential non-personal information of the Plan and the Fund. These terms are included in the Code of Conduct and Conflict of Interest Policy, which is agreed to, and signed, by all Directors.

PSSPTI shall impose the same standards and controls with any of its service providers that are or may be in possession of Personal Information or any other confidential and sensitive information, within any executed contracts or service agreements undertaken with said service providers. The purpose of this Privacy Policy is to ensure that PSSPTI meets its legislated and ethical obligations in its management and protection of Personal Information.

### Definitions

Board	Board of Directors of PSSPTI
Board Director/ Director	a member of the Board
Chair	chairperson of the Board
Committee	the internal committees established by the Board
External Parties	includes any individual(s) and/or corporation(s) or other entities that are not a member, pensioner, beneficiary, or employer of current or previous members, of the Plan nor any Third Parties currently contracted with PSSPTI
Fund	Public Service Superannuation Fund
NS Pension	Nova Scotia Pension Services Corporation

Personal Information	includes information about an identifiable individual, for example, date of birth, social insurance number, income, home address, marital status, contributions, salary, eligible pensionable service, and medical information, but does not include (i) the position name or title, business address, business telephone number, or business e-mail address of a member, pensioner, or beneficiary of the Plan when such business contact information is used for the purpose of communicating or facilitating communication with a member, pensioner, or beneficiary in relation to their employment; (ii) information that is publicly accessible
Plan	Public Service Superannuation Plan
PSSPTI	Public Service Superannuation Trustee Inc.
Third Parties	includes any individual(s) and/or corporation(s) currently contracted under a service agreement with PSSPTI
Vice-chair	one of two Vice-chairs of the Board

## Application

This Privacy Policy applies to all:

- Board Directors and Committee members of PSSPTI
- Personal Information under the administration of PSSPTI

## Principles

(a) Accountability:

- PSSPTI shall be accountable for all information under its administration, including information disclosed to Third Parties for processing.
- The Chair is accountable for the PSSPTI's compliance with this Privacy Policy.
- External Parties requesting non-public Plan or Fund information will be directed to the Chief Executive Officer, NS Pension who will evaluate the request, respond directly, or consult with the Chair, or the Vice-chairs, acting jointly in the Chair's absence, on an appropriate response.

(b) Identifying Purposes of Collection:

- PSSPTI and/or NS Pension shall identify, where reasonable, the purpose for which Personal Information is collected at or before the time the information is collected.
- The collection of Personal Information shall be for purposes considered reasonable given the responsibilities of PSSPTI and NS Pension. Such purposes include, but are not limited to, the administration of the Plan, Fund, pension and benefits of members, pensioners, and their beneficiaries, and communication of information to said parties.

(c) Obtaining Consent:

- The consent of the respective member, pensioner, or beneficiary shall be obtained as required or permitted by law for the collection, use, or disclosure of Personal Information, except where consent is not possible and the collection, use, or disclosure is in the best interests of the individual (e.g. individual is seriously ill or incapacitated), prohibited by law or as set out in (e) - Limiting Use, Disclosure, and Retention, below.
- The form of the consent requested may vary depending on the circumstances and the type of Personal Information.
- A member, pensioner, or beneficiary's consent is implied in situations where reasonable expectations are applicable such as enrolment in the Plan.

(d) Limiting Collection:

- The collection of Personal Information shall be limited to that which is necessary for the purposes identified by PSSPTI and/or NS Pension.
- Information shall be collected by fair and lawful means.

(e) Limiting Use, Disclosure, and Retention:

- Personal Information shall not be used or disclosed (electronically, verbally, etc.) for purposes other than those for which it was collected, except when:
  - the consent of the same member, pensioner, or beneficiary is received;
  - required or permitted by law;
  - required by a government institution or the member, pensioner, or beneficiary's next of kin or authorized representative if there are reasonable grounds to believe that the member, pensioner, or beneficiary is suspected of, has been the victim of, or is suspected of having been the victim of financial abuse or fraud and where it is reasonable to expect that obtaining the consent from the member, pensioner, or beneficiary for the disclosure would compromise the ability to investigate the abuse or fraud;
  - required by currently contracted service providers in connection with services being provided to PSSPTI while acting under a duty of confidentiality (e.g. NS Pension, auditors); or
  - requested by the same member or pensioner's current and/or previous employer and under the following circumstances:
    - The employer would reasonably have or have had such information on-file for the member as part of the employer/employee relationship.
    - The requested information was originally provided to NS Pension by the requesting employer as part of NS Pension's regular responsibilities regarding such employer's pension plan.
    - The requested information does not contain pension-specific information (e.g. selected survivor option) provided by the member or pensioner directly to the PSSPTI and/or NS Pension in confidence that can be connected directly to an individual member or pensioner.
    - The requested information does not contain Personal Information of pensioners.
- Personal Information shall be retained only as long as necessary for the fulfillment of those purposes, and as PSSPTI and/or NS Pension requires in order to satisfy potential legal obligations.

- (f) Accuracy of Personal Information:
- PSSPTI and/or NS Pension shall keep Personal Information as accurate, complete, and up-to-date as is reasonably possible for the purposes for which it is to be used and for which the Personal Information is under the control of PSSPTI and/or NS Pension.
  - Members, employers, pensioners and beneficiaries shall make all reasonable efforts to provide accurate, complete, and up-to-date Personal Information.
- (g) Safeguards:
- PSSPTI and NS Pension shall ensure there are current policies and procedures in place concerning the administration of Personal Information and other confidential information that is collected, stored, accessed, processed or disposed of within its custody and control. The safeguarding measures include physical and technological controls as well as audit and educational measures.
- (h) Openness:
- PSSPTI shall be open about its Privacy Policy, process and practices.
- (i) Providing Access to Personal Information:
- Upon request and with appropriate verification of identity, PSSPTI and/or NS Pension shall provide a member, pensioner, or beneficiary access to their own Personal Information, except where PSSPTI and/or NS Pension is required or permitted by law not to do so, and in conjunction with section (e) - Limiting Use, Disclosure, and Retention.
  - Requests for access to a member, pensioner, or beneficiary's own Personal Information shall be managed by PSSPTI and/or NS Pension. PSSPTI and/or NS Pension may require a reasonable amount of time to process requests for access as PSSPTI and/or NS Pension staff are required to perform a diligent review prior to providing access to Personal Information.
- (j) Questions of Compliance:
- Individuals may contact the Chair with questions or concerns surrounding PSSPTI's compliance with the above stated principles. Any suspected or actual breach of this policy must be timely reported to the Chair and/or Vice-chair(s) of the PSSPTI.

## Policy Monitoring and Review

The PSSPTI Governance, Communications and Member Services Committee is responsible for the development, implementation, and biennial review of this Privacy Policy.

## Enquiries

Any questions of uncertainty pertaining to the meaning or application of this Privacy Policy should be referred to the Chair.

## References

- *NS Public Service Superannuation Act* and plan text, and Collective Agreements
- NS Pension Communications and Disclosure Policy
- NS Pension Privacy Policy
- *Personal Information Protection and Electronic Documents Act*
- PSSPTI Code of Conduct and Conflict of Interest Policy
- PSSPTI Communications Policy

**APPROVED BY MOTION** by the Public Service Superannuation Plan Trustee Inc. Board of Directors on October 24, 2013 with subsequent amendments approved by motion:

- May 5, 2016
- June 25, 2016
- June 23, 2020