

**BOILERMAKERS' NATIONAL PENSION FUND (CANADA)
BOILERMAKERS' NATIONAL HEALTH AND WELFARE FUND (CANADA)**



PRIVACY POLICY

APPROVED BY THE BOARD OF TRUSTEES: MARCH 2015

AMENDED BY THE BOARD OF TRUSTEES: SEPTEMBER 2017

The Board of Trustees is responsible for the good governance of the Boilermakers' National Pension Plan (Canada) and the Boilermakers' National Health and Welfare Plan (Canada) ("Plan" or "Plans") and the Boilermakers' National Pension Fund (Canada) and the Boilermakers' National Health and Welfare Fund (Canada) ("Fund" or "Funds").

Privacy of Personal Information is the cornerstone of the Plans' administration procedures and policies. The Trustees understand the importance of protecting Personal Information. The Trustees are committed to collecting, using and disclosing Personal Information responsibly and in compliance with all applicable legislation. The Trustees are committed to being open and transparent about the way the Plans handle Personal Information.

Personal Information - Personal Information includes any factual or subjective Information, recorded or not, about an identifiable individual. This includes Information, in any form, such as:

- Social Insurance Number
- income
- ethnic origin
- personal address
- opinions, evaluations, comments, medical records

Personal Information is not - Personal Information does not include the title or business address, or business telephone number, of a Plan member or person on whose behalf a contribution is received by the Plans.

The Trustees are aware of the sensitive nature of the Personal Information that members have disclosed. The administration staff of the Plans are trained in the appropriate uses, and protection, of Personal Information. Together with the Trustees, those involved in the administration of the Plans ensure that:

- Only necessary Personal Information is collected;
- Personal Information is shared only with consent and as indicated in this Privacy Policy unless written notification from a member is received allowing other disclosure;
- Storage, retention and destruction of Personal Information complies with all applicable legislation;
- The Plans' privacy protocols comply with all applicable privacy legislation and standards of the applicable regulatory authorities in particular all applicable legislation dealing with privacy and health care records.

The Plans' practices adhere to the Pension Information Protection and Electronic Documents Act (PIPEDA). Specifically the Plans follow the code in Schedule I of PIPEDA, that was developed by business, consumers, academics and governance under the auspices of the Canadian Standards Association (CSA) for the Protection of Personal Information. The hallmarks of our privacy practices are:

- 1. Accountability** – The Plans are responsible for the Personal Information under its control. The Trustees have designated individuals who are accountable for the Plans' compliance with the Privacy Policy.
- 2. Identifying Purposes** - The purposes for which Personal Information is collected shall be identified at or before the time the Personal Information is collected.
- 3. Consent** - The knowledge and consent of the individual are required for the collection, use, or disclosure of their Personal Information, except where inappropriate.
- 4. Limiting Collection** - The collection of Personal Information will be limited to that which is necessary for the purposes the Plans have identified. Personal Information will be collected by fair and lawful means.
- 5. Limiting Use, Disclosure, and Retention** - Personal Information will not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal Information will be retained only as long as necessary for the fulfilment of those purposes.

6. **Accuracy** - Personal Information will be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.
7. **Safeguards** - Personal Information will be protected by security safeguards appropriate to the sensitivity of the Personal Information.
8. **Openness** – The persons responsible for Plan administration will make readily available specific Information about its policies and practices relating to the management of Personal Information.
9. **Individual Access** - Upon request, an individual will be informed of the existence, use, and disclosure of his or her Personal Information and shall be given access to that Personal Information. An individual shall be able to challenge the accuracy and completeness of the Personal Information and have it amended as appropriate.
10. **Challenge Compliance** - An individual will be able to address a challenge concerning our compliance with the above Principles to the designated individual or individuals accountable for the Plans' privacy practices.

The Plans' Practices for Protection of Personal Information

The Plans will collect, use and disclose Personal Information for the following purposes:

- to confirm identity, and protect against errors, fraud or other misrepresentations;
- to determine eligibility for benefits;
- to ensure employer contributions are properly allocated;
- to administer and or confirm compliance with the applicable collective agreement and/or reciprocal agreement;
- to enable the Plans to contact necessary persons;
- to establish and maintain communication with Plan Members and other stakeholders;
- to comply with a variety of legal requirements, including any tax reporting obligations under the Income Tax Act;

Access to Personal Information will only be provided to:

- The Plans' administration staff who need the Personal Information for the performance of their duties to determine the benefit entitlements payable under the terms of the Plans;
- The Board of Trustees governing the Plans, if such Personal Information is required to permit them to carry out their fiduciary duties, including managing any appeal made in

- respect of a benefit determination of the Plans;
- The Local Union(s)/Lodge Offices of the International Brotherhood of Boilermakers (IBB) including its International Office, or an agent of the IBB, only to the extent that the Plan Member has authorized a response to one of the foregoing in relation to a benefit entitlement;
 - The IBB, or an agent of the IBB, in respect of managing outward communication to Plan Members such as promotional material issued by the IBB or IBB newsletters or other general communication to Plan Members;
 - The IBB for the purpose of recognizing the Plan Member's service or retirement status or when a Member has applied for the Pension Plan's termination benefit;
 - The IBB for the maintenance of employment records (dispatch) of Plan Members so that the Plans can, in turn, be informed by the IBB when a Plan Member has been employed and so the Plans can anticipate contributions payable under a collective agreement;
 - The IBB for the purpose of determining whether the applicable person is a member in good standing of the IBB for the purpose of eligibility for Plan benefits;
 - Insurance carriers or persons or firms in related businesses (such as electronic payment providers) in order to maintain Plan policies, coverage, authorize and make payments;
 - Plan actuaries in order to determine benefit costs and entitlements;
 - Legal counsel for the purpose of resolving benefit entitlements;
 - Regulatory authorities in order to comply with applicable legislation, including field or site audits/reviews or other inquiries;
 - Investigative agencies, particularly for the location of Plan Members, their dependants, actual or potential beneficiaries;
 - Any other person or organization who has been given the necessary consent provided the consent has been communicated to the Plans in a form satisfactory to the Plans; and
 - Anyone who is otherwise authorized by law.

The Plans will protect and store Personal Information by:

- Being compliant at all times with the Plans' Record Retention Policy;
- Using Personal Information only for the purpose for which it is collected and keeping this Personal Information in the strictest of confidence;
- Maintaining electronic files and hard copies of Personal Information;
- Keeping hard copies of Personal Information locked in storage rooms and locked filing cabinets;
- Ensuring electronic systems are secure and require passwords;
- Ensuring only authorized Plans administration staff have access to hard copy or electronic records;
- Sending Personal Information electronically to other parties using encryption;
- Sending Personal Information to other parties by mail by marking documents "private";

and

- Maintaining and administration protocol that includes a system of file backup.

The Plans will not, under any conditions, supply medical history without specific written consent from the Plan Member unless required by law.

When requests are received for disclosure of Personal Information, if not covered under the foregoing rules, the Plans will contact the relevant person for permission to release such Personal Information.

Plan Members and others may withdraw consent for use or disclosure of Personal Information. The Plans will explain the ramifications of that decision.

PRIVACY STATEMENT

The Plans will include a Privacy Statement on appropriate Plan documents. The Plans' Privacy Statement is:

Privacy Statement: The Plans will collect, maintain and communicate only the Personal Information considered necessary for the administration of the Plans. Personal Information will be protected pursuant to the applicable legislation. The Plans may use and exchange information with relevant persons and organizations including the Trustees, institutions, investigative agencies, unions, insurers, re-insurers, auditors, legal counsel, actuaries, payroll/payment providers and regulatory authorities in order to manage the Plans and entitlement to the benefits of the Plans. Questions related to the Privacy Policy should be directed to the Benefit Administration Office.

Please be assured that the Trustees and all Plan administration staff are committed to providing excellent service. Plan Members, dependants and beneficiaries are invited to discuss the Privacy Policy with the Plans' Privacy Officer. If you have any questions or concerns about the Plans' Privacy Policy, please contact the Plans' Privacy Officer:

Rob Ward, CEBS, Manager
Boilermakers' Benefit Administration Office
45 McIntosh Drive
Markham, Ontario
L3R 8C7

Tel: 905-946-2530
Toll Free: 1-800-668-7547

Fax: 905-946-2535
Email: rward@boilermakersbenefits.ca
www.boilermakersbenefits.ca

Review:

This Policy is reviewed bi-annually or more frequently if necessary.

Transparency:

This Policy is available to Members via the Plans' web site.