



## Privacy Statement

OSSTF Benefits respects the privacy of its beneficiaries and continuously works to protect the confidentiality of its beneficiaries' Personal Information. This Privacy Statement describes how we manage the Personal Information of beneficiaries of the OSSTF ELHT (Employee Life and Health Trust) in accordance with the principles outlined under the *Personal Information Protection and Electronic Documents Act* ("PIPEDA"). This Privacy Statement does not apply to the Personal Information of employees of OSSTF Benefits in their capacity as employees of OSSTF Benefits.

In this Privacy Statement, "Personal Information" means information about an identifiable individual. Personal Information does not include aggregate information or other information that cannot be associated with a specific, identifiable individual.

### Accountability

OSSTF Benefits is responsible for maintaining and protecting the Personal Information in its possession or custody, including Personal Information that has been transferred to a third-party for processing. Donna Morrison, Executive Director has been designated as the OSSTF Benefits Privacy Officer to oversee compliance with this Privacy Statement. She may be contacted by email at [donna.morrison@osstfbenefits.ca](mailto:donna.morrison@osstfbenefits.ca).

OSSTF Benefits has retained a third-party administrator (the "Administrative Agent") to perform administrative services for the OSSTF ELHT. The Administrative Agent collects Personal Information on behalf of OSSTF Benefits from predecessor plans, employers, and from you or your dependents. This Privacy Statement or a comparable privacy policy established by the Administrative Agent applies to any Personal Information that they collect as the Administrative Agent. OSSTF Benefits retains other third-parties to provide services for the OSSTF ELHT, such as insurers, actuaries, and consultants. All third-party agents or service providers that we retain are required to undertake to protect the Personal Information of OSSTF beneficiaries in accordance with PIPEDA and to comply with this Privacy Statement or a comparable privacy policy.

### Identifying Purposes

Personal Information is collected, used, and disclosed for the purpose of administering the OSSTF ELHT in accordance with its governing documents, applicable law, and the fiduciary and other legal obligations of the Trustees of the OSSTF ELHT. The purpose of collecting Personal Information will be identified at or before the time we collect it.

### Consent

Knowledge and consent are required for us to collect, use, or disclose Personal Information except where authorized by law. Consent may be given directly by the individual whose Personal Information is being collected, used, or disclosed or by an

authorized representative (such as a legal guardian or person holding a power of attorney). Consent may be express or implied, depending on the circumstances and the type of Personal Information.

Individuals may withdraw their consent to the collection, use, or disclosure of their Personal Information at any time, subject to legal or contractual restrictions and reasonable notice. However, if an individual withdraws their consent, we may not be able to provide them or their beneficiaries with benefits under the OSSTF ELHT.

### **Limiting Collection**

We limit the collection of Personal Information to information that is necessary for the purpose identified above and only collect Personal Information by fair and lawful means. The Personal Information we collect includes, but is not limited to: name, contact information, date of birth, gender, and information about your dependants. We or the Administrative Agent acting on our behalf may collect Personal Information from employers and predecessor plans.

### **Limiting Use, Disclosure and Retention**

We will not use or disclose Personal Information for a purpose other than that identified above except with consent or where authorized by law. To fulfil the purpose identified above, we may share Personal Information with our agents or service providers. We use contractual or other means to protect Personal Information that we share with our third-party agents and service providers. The release of Personal Information to our agents or service providers is considered a use and not a disclosure.

We will not use or disclose Personal Information that is personal health information and was received from a health information custodian for any purpose other than the purpose for which it was disclosed to us unless authorized by law and will limit such use or disclosure to that which is reasonably necessary to meet such purpose unless authorized by law.

We take all reasonable steps to protect the confidentiality of Personal Information when we are utilizing this information.

We will never sell your Personal Information to others.

OSSTF Benefits retains Personal Information for only as long as it is required for the reason it was collected or as required for any legal or regulatory requirements. We destroy, erase, or anonymize Personal Information that is no longer required.

### **Accuracy**

OSSTF Benefits keeps Personal Information as accurate, complete, and up-to-date as is necessary for the purpose identified above. We expect beneficiaries to participate in keeping their own Personal Information as up-to-date and accurate as possible.

**Safeguards**

We protect Personal Information through security safeguards appropriate to the sensitivity of the information. Only those employees of OSSTF Benefits and the Trustees of the OSSTF ELHT who require your Personal Information for the purposes for which it was collected are provided with access to it.

**Openness**

This Privacy Statement describes our practices for the management of Personal Information. Upon request, we will provide individuals with additional information about our practices for managing Personal Information.

**Individual Access**

Upon request, we will advise you of existence, use, and disclosure of your Personal Information and provide you with access to that Personal Information in accordance with PIPEDA. You have the right to challenge the accuracy and completeness of your Personal Information and have it amended as appropriate.

**Questions and Complaints**

If you have any questions or complaints regarding this Privacy Statement, about our collection, use or disclosure of Personal Information, or about accessing your Personal Information, please contact Donna Morrison, Executive Director by email at [donna.morrison@osstfbenefits.ca](mailto:donna.morrison@osstfbenefits.ca)