

## **STEELWORKERS TRUSTEED BENEFIT PLAN**

**CONSENT.** We obtain your knowledgeable consent for the collection, use, or disclosure of your personal information, except where inappropriate.

**LIMITING COLLECTION.** We limit our collection of your personal information to that which is necessary for the purposes we have identified, and we collect your personal information by fair and lawful means.

**LIMITING USE, DISCLOSURE, AND RETENTION.** We do not use or disclose your personal information for purposes other than those for which we have collected it, except with your consent or as required by law. We retain your personal information only as long as necessary for the fulfillment of those purposes.

**ACCURACY.** We ensure that your personal information is as accurate, complete, and up-to date as is necessary for the purposes for which we use it.

**SAFEGUARDS.** We protect your personal information by security safeguards appropriate to the sensitivity of the information.

**OPENNESS.** We make specific information about our policies and practices relating to the management of personal information readily available to you.

**INDIVIDUAL ACCESS.** Upon request, we will inform you of the existence, use, and disclosure of your personal information and give you access to that information. You have the right to challenge the accuracy and completeness of your personal information and have it amended as appropriate.

**CHALLENGING COMPLIANCE.** You have the right to address a challenge concerning our compliance with the above principles to our Privacy Officer.

**INDIVIDUAL ACCESS.** You and your eligible dependent may access the personal information we have about you and ask us to correct any errors or omissions.

### **QUESTIONS REGARDING THE PRIVACY CODE?**

BPA's staff is trained to promptly address any questions or concerns you may have about the handling of your personal information.

### **CONTACT INFORMATION**

We trust you will find the Code and answers helpful in understanding your privacy rights under your Plan. If you have any comments, questions, complaints, or wish to exercise your right of access to your personal information, please contact us at:

**PRIVACY OFFICER**  
**Steelworkers Trusteed Benefit Plan**  
**135 Queen's Plate Drive, Suite 200**  
**Toronto, Ontario M9W 6V1**  
**Tel: 416.745.6466**  
**Fax: 416.745.3778**  
**Toll Free: 1.888.290.9777**  
**E-mail: [privacy\\_officer@bpagroup.com](mailto:privacy_officer@bpagroup.com)**



## **STEELWORKERS TRUSTEED BENEFIT PLAN**

### **Privacy Policy**

#### **PRIVACY CODE INTRODUCTION**

The Steelworkers Trusteed Benefit Plan takes the confidentiality of your personal information entrusted to us very seriously. Any information we receive about you and your eligible dependents is kept private. We know that you are increasingly concerned about privacy and, therefore, we have established the following Privacy Code, in accordance with the Personal Information Protection and Electronic Documents Act, setting out the principles to which we will adhere. We have also provided answers to questions you may have about the procedures that we follow to protect the privacy of your personal information.

## ABOUT OUR ADMINISTRATOR

Benefit Plan Administrators (BPA) is a Third Party Administrator specializing in the administration of Trusteed multi-employer benefit plans. The Board of Trustees has appointed BPA as the Administrative Agent of your Benefit Plan (the “Plan”). Any personal information they collect as the Administrative Agent is kept private.

## PRIVACY CODE

We adhere to the following principles:

**ACCOUNTABILITY.** We are responsible for personal information under our control, and have designated a Privacy Officer who is accountable for our compliance to these principles.

**PURPOSES.** We collect your personal information only for the purposes of administering your benefits under the Plan, including the determination of eligibility and the payment of benefits, and for routine activities such as audit, recording-keeping and reporting.

## WHAT IS PERSONAL INFORMATION?

We consider any identifiable information about you and your eligible dependents to be “personal information”.

You and your eligible dependents provide the Plan with the following personal information:

- Name
- Social Insurance Number
- Home Address
- Telephone Number
- Date of Birth
- Gender
- Marital Status
- Health information as it relates to your benefit entitlement

BPA collects information about your earnings and work history from your Employer(s). Local Union(s) may also provide BPA with updates of the personal information listed above. BPA may also collect other information in order to determine your eligibility for benefits.

## WHO COLLECTS THIS PERSONAL INFORMATION?

- BPA collects personal information on behalf of the Board of Trustees.

- BPA will explain the need for information, will limit the collection of information to what is needed, and will use information for those purposes only.
- You and your eligible dependents’ consent may be expressed or implied.
- You and your eligible dependents grant consent for the collection, use and disclosure of personal information when enrollment forms, claim forms, retirement/termination packages and various benefit entitlement forms are completed.
- You and your eligible dependents can withdraw consent at any time by writing to the Privacy Officer, provided there are no legal requirements to prevent this.
- BPA may also collect information from Employer(s) and Local Union(s). This will be limited to information that is required for a particular purpose.

## HOW IS PERSONAL INFORMATION PROTECTED?

- BPA keeps your personal information in the strictest confidence, and uses it only for the purposes for which it was collected.
- BPA maintains both paper and electronic files containing personal information.
- All paper files maintained by BPA are kept in locked filing cabinets and/or storage rooms.
- Access to BPA’s offices is restricted to authorized personnel, and only during regular business hours.
- BPA utilizes mainframe and network computers, which are “password protected”, to maintain all electronic files.
- Internet access to BPA’s electronic files containing personal information is “firewall protected”.

## WHO HAS ACCESS TO PERSONAL INFORMATION?

- BPA has access to personal information provided by the Employer(s) and the
- Local Union(s) in the database and paper files it maintains on behalf of the Plan.
- The Trustees have access to such personal information as required to permit them to carry out their fiduciary duties.
- Access to personal information maintained by BPA is on a “need to know” basis.
- BPA’s staff only has access to the particular personal information needed to determine the benefit

- entitlements payable under the terms of the Plan.
- BPA’s staff certifies annually that they will maintain the confidentiality of the information entrusted to them.

## WHO IS PERSONAL INFORMATION DISCLOSED TO?

- If we use the expertise of an outside company to do work involving your personal information we will select only those companies whose privacy policies are comparable to our Code.
- In order to maintain and authorize the payment of benefits, BPA may disclose personal information to benefit providers such as EAPs Drug Card Providers, Investment Managers, Insurance Carriers, and Trust Companies.
- Personal information may also be disclosed to the Plan’s Accountants in the course of routine administration such as audit, record-keeping and reporting.
- Personal information is disclosed either in person, by mail, e-mail, telephone, fax or other electronic means.
- All such disclosure is on a “need to know” basis, and all such outsiders are required to agree that they will comply with our Code.
- BPA may disclose personal information if they have reasonable grounds to believe it can be useful in the investigation of a contravention of the law, such as fraud.

## HOW LONG IS PERSONAL INFORMATION RETAINED?

- Once personal information is no longer required, paper files are shredded and electronic files are purged from BPA’s computer systems, except as required under the Federal and Provincial legislation.
- The length of time BPA retains information varies depending on the service and the nature of the information. This period may extend beyond your relationship with us but only for as long as it is legally necessary for us to have sufficient information to respond to any issue that may arise at a later date.
- BPA will use appropriate safeguards to prevent unauthorized parties from gaining access to the information during the removal process.