

## **Privacy Statement**

At the Multi-Sector Pension Plan (the “MSPP” or the “Plan”) we are committed to protecting the privacy of Plan members and safeguarding their personal information. As part of this commitment, we have established this Privacy Statement to govern our actions as they relate to the collection, use and disclosure of personal information regarding MSPP members, their spouses and beneficiaries.

The MSPP defines personal information very broadly and takes the view that all information about an identifiable individual is personal information except that individual’s name, title, address and telephone number.

In developing this Privacy Statement, we conducted a thorough review of our practices and re-examined why we collect, use and retain certain personal information.

We invite you to review the 10 principles of our Privacy Statement. Any concerns that you have regarding your personal information with us may be addressed to our Privacy Officer, who is responsible for monitoring and promoting the MSPP’s compliance with this Privacy Statement.

Protecting the confidentiality of the personal information of Plan members has always been of fundamental importance to the MSPP. With the Privacy Statement, we renew our commitment to protect your privacy and safeguard the personal information of Plan members and their families which is in the possession of the MSPP.

### **Principle 1 – Accountability**

The MSPP is responsible for personal information under its control.

The Privacy Officer of the MSPP is responsible for monitoring and promoting compliance with this Privacy Statement.

We have established policies and procedures to implement the Privacy Statement, including:

- Adopting policies and procedures to protect personal information we collect, use and disclose in order to administer the Plan;

- Requiring third parties who provide services to the MSPP to abide by the terms of this Privacy Statement;
- Establishing procedures to respond to inquiries and complaints regarding the collection, use or disclosure of personal information by the MSPP;
- Training our staff about the importance of protecting the personal information under their control; and,
- Providing information to Plan members about the collection, use or disclosure of personal information by the MSPP.

### **Principle 2 – Identifying Purposes**

We collect personal information from you, your employer and others that we need to administer the Plan, including to:

- accurately record and validate contributions received from employers;
- credit those contributions to individual Plan members;
- process benefit applications;
- determine benefit entitlements for Plan members and beneficiaries;
- communicate information about the MSPP;
- understand and analyze your pension needs and develop services to inform you about your entitlements;
- assess the quality of the service we provide; and,
- comply with applicable laws.

### **Principle 3 – Consent**

We will obtain your express consent before collecting, using or disclosing your personal information for a purpose other than the administration of the Plan, unless otherwise authorized by law.

Participation in the MSPP is mandatory for all bargaining unit members whose collective agreements require contributions to the MSPP. The information that you, your employer and others provide in relation to the Plan is collected, used or disclosed under the authority of *the Pension Benefits Act (Ontario)*, the *Income Tax Act (Canada)* and the applicable collective agreement. Your consent to the collection, use and disclosure of personal information for the administration of the Plan is implied by your participation in the MSPP and cannot be withdrawn.

#### **Principle 4 – Limiting Collection**

We will collect only the personal information we need for the purposes described, and will do so only by fair and legal means.

Examples of the personal information we collect and maintain for use in administering the MSPP include a Plan member's wage rate and hours of work, age, contact information, sex, marital or family status, social insurance number, pension income, tax Information, work history, date of death and retirement date as well as information regarding the member's spouse, former spouse, survivors or beneficiaries.

#### **Principle 5 – Limiting Use, Disclosures and Retention**

We will use or disclose your personal information only for the purposes described, and retain it only for as long as is necessary for the administration of the Plan.

If we wish to use or disclose your information for a purpose other than the administration of the MSPP we will obtain your consent first, unless otherwise authorized by law.

We will not sell your personal information to other organizations or individuals.

#### **Principle 6 – Accuracy**

We will make every reasonable effort to keep your personal information up-to-date and accurate.

## **Principle 7 – Safeguarding Your Information**

We will protect your personal information with appropriate safeguards and security measures according to its sensitivity.

We will make every reasonable effort to protect our personal information against loss or theft as well as unauthorized access, disclosure, copying, use or modification.

## **Principle 8 – Openness**

Information about our privacy policies and practices concerning your personal information is available upon request.

## **Principle 9 – Individual Access to information**

Upon written request, we will advise you of the collection, use and disclosure of your personal information and provide you with access to your personal information. You may challenge the accuracy and completeness of this information and request to have it amended as appropriate. We will record your concern if it is not resolved to your satisfaction.

We will respond to your access request within 30 days. There will be no charge for the reasonable requests for such access.

Upon written request, we will disclose to you our record of your personal information along with an account of the source of the information, its use by us and its disclosure to third parties.

We may be unable to provide access to some or all of your personal information in certain circumstances including those where the information:

- is unreasonably costly to provide;
- contains references to other individuals;
- cannot be disclosed for legal or security reasons; or,
- is subject to solicitor-client or litigation privilege.

## **Principle 10 – Inquiries or Complaints**

Any inquiry regarding our Privacy Statement may be addressed to:

Multi-Sector Pension Plan  
105 Commerce Valley Drive West  
Suite 310  
Thornhill, Ontario  
L3T 7W3  
Attention: Member Services

**Phone:** (905) 889-6200 or 1-800-287-4816 (toll free)  
**Fax:** (905) 889-7313  
**Email:** [info@mspp.ca](mailto:info@mspp.ca)

Any complaint regarding compliance with our Privacy Statement may be addressed to Our Privacy Officer, Alain Malaket

**Phone:** (905) 889-6200 or 1-800-287-4816 (toll free)  
**Fax:** (905) 889-7313

We will respond to all inquiries or complaints related to the handling of personal information. If a complaint is found to be justified, we will take appropriate measures. Complaint procedures are available from the Privacy Officer.