

Privacy Statement

The CAAT Pension Plan (“CAAT”, “the Plan”, “we”) is committed to protecting your personal information. This Privacy Statement describes how we collect, use, disclose and protect the personal information of members of the Plan (“you”, “your”), as well as your beneficiaries and other related individuals.

Personal information refers to information that can identify an individual, such as your name, date of birth or pension information. This Privacy Statement does not apply to data that is not personal information, such as business information or anonymous information like statistics.

Our collection, use and disclosure of personal information

Why do we collect personal information, and how do we use it?

We collect personal information to administer the Pension Plan and fulfil our legal and regulatory reporting obligations. More specifically, we use your personal information to:

- establish and maintain your membership in the Plan
- manage and administer the Plan, which includes creating and maintaining internal databases and records about members and related individuals
- calculate and pay out your pension and other benefits under the Plan
- produce and issue personalized statements, notices, and retirement or termination documents to members and related individuals
- assess and evaluate claims for pension and benefits entitlement
- communicate with you and your employer(s), which can include verifying your identity, recording our interactions with you, and sending email newsletters with important Plan information
- comply with our legal and regulatory obligations (including those in *Pension Benefits Act* (Ontario), *the Income Tax Act* (Canada) and any other applicable legislation)

- investigate, detect, and prevent fraud or other illegal or unauthorized activity, and to collect funds owing
- improve the member experience, which can include research, development, and analysis to improve our services

We may collect or use personal information for additional purposes with your consent or as permitted or required by law.

What information do we collect?

The personal information we collect varies depending on your relationship with us (e.g. member, retired member, prospective member, beneficiary or spouse) and includes:

- Your name, address, telephone number, and other contact information
- Biographical information such as your sex, date of birth and spousal status
- Employment information including the name of your employer(s), employment dates, employment category and employment earnings;
- The name and date of birth of your spouse, children and/or beneficiary
- Benefit amounts
- Information included on a death certificate
- Divorce or separation agreement information
- Orders or judgments from a court, tribunal or similar body relating to pension entitlement
- Declarations in connection with marriage breakdown
- Power of attorney designations
- Social insurance number and banking information
- Other information with your consent or as permitted or required by law

We collect most of this information directly from you and your employer. We also collect some information automatically when you visit our website (see the section entitled “Our use of technology” below for details). In some cases, we collect information about you from third parties or from publicly available sources.

Who do we share personal information with?

We may share personal information with trusted third parties to help us administer the Plan and to comply with our obligations. These third parties include service providers that assist in the operation of the Plan, including:

- Financial and professional services providers, such as consultants and legal counsel
- Asset servicing companies, to pay out pension benefits

- Actuarial firms, to create actuarial valuations
- Third party pensions administrators, to administer the pensions of members from certain participating employers
- Information technology service providers, to maintain the pension administration system
- Mailing services providers, to send out statements and notices
- Research organizations, to assist us with research and development to improve our services
- Debt collection agencies, to assist with the collection of funds owing

We require service providers to protect personal information shared with them, and limit their use and retention of it to what is necessary to provide services to the Plan.

We may also disclose personal information to other third parties in the following circumstances:

- Limited information to certain participating employer(s) or organizations representing groups of employers for the purposes of administering other employer benefit programs
- To government or regulatory bodies to comply with our legal and regulatory obligations, legal processes, and governmental requests (such as the Canada Revenue Agency and the Financial Services Regulatory Authority of Ontario)
- To protect our rights and property, to respond to emergencies, and to protect the safety of any person
- To detect and prevent fraud, and to investigate and enforce the potential breach of an agreement or law
- When it is relevant to a business transaction, such as a sale of part or all of the Plan, a re-organization, or a partnership opportunity
- When we have obtained your consent, or as otherwise permitted by law

We do not sell or trade any personal information we collect.

Our use of technology

How do we use cookies and web analytics?

Like many other websites, our website uses cookies to collect information about website visitors. Cookies are small text files that are automatically deposited on a visitor's device.

Information we collect via cookies helps us learn more about how the website is typically used, including the total number of visitors, which webpages they visit the most, the geographical location of the visitor, and the types of Internet browsers (e.g., Google Chrome, Firefox or Microsoft Edge) and operating systems (e.g., Windows or Apple MacOS) that our visitors use. We use this information to enhance the user experience and the overall quality of the website.

You can adjust your browser settings to disable cookies. To learn more about your Internet browser's cookie options, please refer to instructions from your particular browser. Please note that if you adjust your browser settings to reject or disable certain cookies, the functionality of certain elements of the Site may be impacted.

We also use Google Analytics to better understand how visitors interact with our website and our online advertisements. This includes information related to how many times a user visits our website, what pages they visit, and where they were referred from. To learn more about Google Analytics, [click here](#). Users can deactivate the Google Analytics function with a browser add-on, which can be downloaded [here](#).

How do we use AI, machine learning, and automated decision-making?

We use technology to support and enhance our people and processes, but we do not rely on fully automated tools to make decisions about individuals based on personal information. We use artificial intelligence and machine learning programs in our regular operations, but we have procedures in place to maintain human oversight and Plan accountability for all technology in use.

Third-party websites

Our website may include links to other websites that are operated or controlled by a third party. These websites are not governed by this Statement, and we encourage you to review any privacy policies associated with linked third-party websites.

Our privacy practices

How long do we keep your information?

We keep your personal information in our records only as long as it is needed to fulfill the purposes for which it was collected, as required to comply with applicable law, or to satisfy business or regulatory requirements. After this, we will securely destroy, delete, or anonymize the personal information.

How is your information protected?

We maintain various physical, technological and organizational security measures designed to protect your personal information from theft, loss, or unauthorized disclosure, use, copying, or modification. This includes secure storage (physical and digital), passwords, encryption, secure file transfer methods, and other electronic security measures.

Is your information transferred outside your jurisdiction?

We may transfer your personal information to service providers or other trusted third parties that are located outside of your province or Canada, where it may be accessed, stored, or otherwise processed. We use appropriate safeguards to ensure that your personal information is protected no matter where it is used or stored.

When your personal information is transferred to a jurisdiction outside of your province or Canada, it may be subject to the law of that foreign jurisdiction, including any law permitting or requiring disclosure of the information to the government, government agencies, courts and law enforcement in that jurisdiction.

How is your consent obtained?

We collect, use and disclose your personal information with your consent, except as permitted or required by law (for example, we may have to handle your personal information without consent to comply with a legal requirement). Your consent to our collection, use and disclosure of personal information may be obtained through this Statement or in other ways.

When you provide us with personal information about third parties, such as your spouse or beneficiaries, you represent to us that you have that person's consent to provide it to us or that you otherwise have the legal authority to do so.

Your privacy rights

How do you access or correct your personal information?

We make every effort to ensure the information we collect remains accurate and up to date. We ask that members review their personal information on their Annual Pension Statement each year to confirm the accuracy of their data and keep us or your employer informed of any changes that need to be made.

If you believe that the personal information we maintain about you is not correct, you can make a request to correct it by writing to the Privacy Officer using the contact information set out below. You may also request access to the personal information that we maintain about you by writing to the Privacy Officer.

We may need to verify your identity or obtain more information before responding to your request. In some cases, our legal obligations will prevent us from granting a request for access to or correction of personal information. We will inform you in writing of the reasons for any such decision.

How do you withdraw your consent?

Most of the uses and disclosures of your personal information set out above are necessary to administer the Plan, and you will not be able to withdraw your consent to these uses or disclosures while still being a member of the Plan. Please contact the Privacy Officer using the contact information set out below if you have any questions or concerns.

As described above, we sometimes communicate with members via email newsletters, which are part of our obligation to provide members with important information about the Pension Plan. You have the option to unsubscribe from email newsletters that are sent direct-to-member. It is important to note, however, that if you do unsubscribe, you may not receive timely and important information that can impact your membership in the Plan.

Depending on where you live, you may have the option to exercise additional privacy rights, in accordance with applicable provincial or territorial laws. Please contact the Privacy Officer using the contact information set out below for more information on your privacy rights.

Updates to this Statement

This Privacy Statement may be revised from time to time. The most recent version will always be available on our website. If an update to the Statement includes significant differences regarding how we handle personal information, we will make reasonable efforts to notify you if necessary.

We encourage you to review this Privacy Statement frequently. Your continued provision of personal information following any changes to this Privacy Statement constitutes your acceptance of any such changes.

Questions or concerns

The Privacy Officer oversees the Plan's privacy management program, including our policies and procedures for handling, protecting and destroying personal information, responding to privacy breaches and answering complaints and requests.

If you have any questions or concerns about this Privacy Statement or the use of your personal information, please contact our Privacy Officer:

By mail at:

CAAT Pension Plan
250 Yonge Street, Suite 2500
P.O. Box 40
Toronto ON M5B 2L7

By phone at:

1.866.350.2228 / 416.673.9000

Through email at:

privacy@caatpension.ca

Depending on where you live, if our Privacy Officer cannot resolve your concern, you may have the right to complain to a privacy regulator. The Privacy Officer will provide you with more information about these rights on request.

August 2024