

The Pension Office Corporation of the Anglican Church of Canada

Privacy Policy

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1. INTRODUCTION

The Pension Office Corporation of the Anglican Church of Canada (The Pension Office) is committed to ensuring its employees take all reasonable steps to protect the privacy of members of the pension and benefits plans of the Anglican Church of Canada that we administer, and of any other persons whose personal information is in our control. This policy has been designed to address the principal requirements of data privacy laws in Canada.

1.1 What is personal information?

Personal information is information about an identifiable individual which is private in nature and not readily available publicly. It includes a person's date of birth, marital status, salary, home address and home telephone number. Business information such as a person's name, job title and business contact numbers are not personal information.

1.2 What personal information does The Pension Office collect?

Some examples of personal information we may collect include:

- Social Insurance Number (SIN)
- Date of birth
- Employment history or service information
- Salary and benefits/contributory earnings
- Home address, telephone number and e-mail address
- Banking information for the purpose of making payments
- Marital status and dependants for survivor benefit purposes
- Health information for disability benefits
- Court orders (e.g. garnishments)

2. PRIVACY PRINCIPLES

2.1 Identifying Purposes

The Pension Office collects personal information about Plan Members, and participating employers ("employers") to:

- administer the Plan;
- accurately record and validate service as reported by employers;
- invoice employers for required premiums and collect required contributions;
- determine benefit entitlements and process benefit applications;
- communicate information about the Plan; and
- comply with applicable laws.

2.2 Obtaining Consent

An individual's consent to collect personal information is implied upon enrollment in the Anglican Church Pension and Benefit Plans. In other cases, the form of consent may vary depending on the circumstances and the type of personal information.

2.3 Limiting Collection

The Pension Office limits the collection of personal information to only that which is necessary for the purposes set out above.

2.4 Limiting Use, Disclosure and Retention

The Pension Office limits the use of personal information about Plan Members to administer the Plans. Examples of these activities include, but are not limited to:

- creating and maintaining a member's database;
- calculating service purchase costs and past service pension adjustments;
- preparing and distributing personalized member confirmation and communication documents including but not limited to statements and election forms;
- preparing pension and benefit estimates;
- verifying eligibility of claims for benefit entitlement;
- calculating and paying pension benefits and issuing tax receipts;
- verifying identity when responding to inquiries or requests for information from members;
- meeting statutory and regulatory reporting requirements;
- preparing plan valuation and experience studies; and
- facilitating general administration of the Plans.

Personal information may only be shared with participating employers or third parties when it is necessary for the uses listed above. For example, third parties may include a financial institution to whom payments are required to be made, government agencies in accordance with their statutory authority, another pension plan (on transfer of a pension), or service providers (for example actuary, auditor, legal advisor, or other service provider or contractor). Whenever personal information is transferred, it must be done in accordance with contractual arrangements that impose confidentiality and data protection obligations on the recipients.

The Pension Office has procedures regarding the retention and destruction of personal information. Personal information is maintained only as long as it is needed to fulfill the purposes set out above.

2.5 Accuracy

The Pension Office asks that participating employers provide accurate, up-to-date and complete personal information about Plan Members who are employed by such employers. The Pension Office will make reasonable effort to keep personal information provided up-to-date and accurate.

It is the responsibility of each Plan Member to make reasonable efforts to provide up-to-date, accurate and complete personal information.

2.6 Safeguards

The Pension Office will protect personal information with appropriate safeguards and security measures according to its sensitivity.

This policy stipulates that only those individuals who need personal information for the performance of their duties may have access to it and all reasonable steps must be taken to protect The Pension Office records containing personal information. Individuals who need personal information for the performance of their duties are made aware of their obligations to safeguard such personal information.

If personal information is to be handled by a third party on behalf of The Pension Office, The Pension Office will enter into contractual arrangements with the third party to impose

appropriate security standards to guard against unauthorized use, modifications or loss of the personal information.

The Pension Office has a secure e-correspondence protocol for communication with participating employers which ensures secure communication of personal information and meets the Financial Services Commission of Ontario's policy on Electronic Communications Between Plan Administrators and Plan Beneficiaries. E-mail communication with participating employers containing personal information is not permitted outside of these secure protocols.

2.7 Individual access to information

Upon written request, The Pension Office will provide an individual with details of the collection, use and disclosure of his or her personal information and provide access to that information. Individuals are to be encouraged to review the information and report any inaccuracies or incomplete information. There will be no charge for reasonable requests for such access.

2.8 Questions or Concerns

Any questions or concerns regarding this Policy can be addressed to:

**The Pension Office Corporation of
the Anglican Church of Canada**

625 Church Street, Suite 401

Toronto, ON M4Y 2G1

Attention: Privacy Officer

Phone: (416) 960-2484 or toll free 1-800-265-1070

E-mail: privacy@anglicanpension.ca

The Pension Office will respond to all inquiries or concerns about the handling of personal information and will take appropriate measures, when necessary, in relation to an inquiry or concern.