

# Personal Information Privacy Policy



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## 1. Summary

This Privacy Policy sets out the Plannera, Pensions & Benefits (Plannera) principles and governance framework for the collection, use, disclosure, and retention of personal information in whole or in part of our pension and benefit plan members. This policy demonstrates our commitment to transparency, respect for personal information, and adherence to applicable privacy laws. We encourage you to review this policy and reach out to us with any questions or concerns.

## 2. Statement of Principles and Purpose

Plannera administers pension and benefit plans for over 100,000 members and is a leader in pension and benefit administration. Plannera collects, uses, and discloses personal information while administering pension and benefit plans for the benefit of its members and their beneficiaries.

This policy reflects industry best practices set by the Canadian Standards Association (CSA) Privacy Standards and applicable provincial and federal legislation concerning the protection of personal information and personal health information.

This policy outlines your rights and responsibilities and explains:

- Why and how Plannera collects, uses and discloses personal information to effectively administer the Plan;
- The principles of personal information protection to which Plannera adheres;
- How we maintain the accuracy, integrity and security of your personal information; and
- How you can inquire about Plannera's collection, use and disclosure of personal information.

The collection of personal information shall be limited to that which is necessary for the purpose of administering the plans and collection is required for that purpose.

### 3. Use Consent and Control Mechanisms

We are committed to ensuring that you are fully aware of how your data is collected, used, and protected.

**Explicit Consent:** Whenever we collect your personal information, we will seek your explicit consent first. This consent will be sought through clear, unambiguous mechanisms such as opt-in checkboxes. This means that you must actively agree to the collection of your data; we do not use pre-checked boxes or any other form of implied consent.

**Purpose-Specific Consent:** If we are collecting information for different purposes, we will seek separate consents for each purpose. This way, you maintain control over exactly how your information is used.

**Cookies Consent:** If our website uses cookies, we will clearly communicate this to you and seek your explicit consent before any cookies are placed on your device. This will be done via a prominent, clear cookie banner on our site.

### 4. Protecting Your Personal Information

Personal information is any information relating to you by which you can be identified directly or indirectly, taking into account any information Plannera or other individuals hold about you or could gain access to, such as through public sources. This includes but is not limited to, your name, date of birth, salary, marital status, home address and telephone number.

This policy applies to all personal information collected by Plannera, whether it is stored in paper, electronic, or other formats.

Safeguards are in place to protect all personal information against loss, theft, unauthorized access, disclosure, copying, use or modification including:

- All Plannera employees are required to adhere to internal policies and governance guidelines to ensure protection of your personal information.
- Access to your personal information requires security credentials and permissions to ensure only authorized users are granted access. Security safeguards are in place to help prevent unauthorized access.

- Plannera maintains a secure physical premise with access limited to only Plannera employees or other authorized personnel.
- Plannera ensures procedures are in place to dispose of personal information in accordance with applicable law and in a manner that prevents unauthorized parties from gaining access.

### **5. What Personal Information We Collect and Why**

To administer pension and benefit plans, Plannera needs to collect, use, and disclose various types of personal information. For example, information about your date of birth, earnings, and employment may be used to ensure correct contributions are submitted on your behalf and that you receive the correct pension benefit when you retire. Below are some other examples of personal information we may collect. Please note that this is not an exhaustive list and the examples provided may not all apply to every pension and benefits plan administered by Plannera.

**Mailing address:** We use your address to send you information about your pension and benefits. For example, Member Statements, newsletters and retirement benefits.

**Phone number:** Your phone number(s) is kept on file so we can, if necessary, contact you to discuss your pension and benefits.

**Email address:** We use your email address to send you personal and general information about your pension and benefits.

**Social Insurance Number (SIN):** Your SIN is required, by law, for tax-reporting purposes. It is not used as a personal identifier or as a client account number.

**Employer:** We need to know your employer to collect your pension contributions, pension credit and salary information.

**Salary:** Depending on the pension or benefit plan you participate in, your salary may be used to calculate your pension contributions, benefit premiums and benefits payable.

**Banking information:** When you retire, we will ask you to provide your banking information to set up direct deposit of your monthly pension benefit into your bank account.

**Beneficiary information:** Plan members provide beneficiary information to Plannera by completing the designation of beneficiary form or through their online account available via the Plan website.

**Personal health information:** Your health information is used to administer your benefits.

## 6. Examples of How Personal Information is Used by Plannera

Examples of how personal information may be used to:

- Verify the identity of an individual when responding to communications;
- Determine an individual's eligibility for pension membership in the plan;
- Verify eligibility for benefits;
- Maintain appropriate records, including validating information received from employers;
- Calculate and/or pay a benefit from pension and benefit plans in the event of a plan member's retirement, illness, death, termination, spousal relationship breakdown or similar life event;
- Determine to whom a benefit is payable after a member's death;
- Provide individuals with information or services they request or have an interest in, such as pension estimates, and annual statements;
- Calculate the amount required to credit a member or prospective member with service under a portability transfer agreement;
- Perform an actuarial valuation of a plan;
- Fulfill tax and/or regulatory reporting requirements, maintaining related records; and Perform any special study or calculation requested by a Plan Board, Commission and/or regulatory authorities;
- Register members for online services to view and manage their accounts and use self-service features;
- Register members for one-on-one meetings, in-person or virtual workshops and presentations;
- When pension members provide personal updates such as beneficiary designation information to plannera directly using the designation of beneficiary form or online through their online pension account;
- Solicit members opinion and feedback;
- Subscribe members to newsletter and member statement email notification; and
- Such other purposes to which a member provides consent.

## 7. Information Sharing with Third-Parties

Plannera understands administering your pension and/or benefit plan requires sharing certain personal information with third-party service providers. However, we will only share your personal information with authorized third-party administrators who are contractually obligated to protect your information and use it solely for the purpose of administering your pension and benefits plan.

We do not sell or share your personal information with third-parties without your explicit consent or unless required by law.

### **Examples of situations where personal information may be shared with third-parties:**

- Data that has been stripped of any personal information is provided to actuarial advisors hired by a governing body to determine the funded status of the pension plan. Actuaries use this data collected by Plannera to assess the plan's financial status, as required under pension legislation.
- Legal advisors who assist with a variety of legal services and advice to Plannera. Occasionally, it is necessary to provide personal information to authorized legal advisors who are bound by professional and ethical obligations to protect your information and use it solely for the intended purpose.
- Plannera is required to share certain information with the Canada Revenue Agency (CRA) to fulfill our tax reporting and compliance obligations with applicable law. This may include member contributions and pension adjustments, or pension benefits paid.

## 8. Ways We Collect Personal Information

Plannera collects personal information directly from plan members to administer their pension benefit. When an individual becomes a plan member or opens a pension or retirement account, Plannera may request or disclose information with their employer that is required to administer the pension benefit.





There are several ways Plannera may collect an individual's personal information, including, without limitation:

### 8.1 Member Service Communication

From time to time, Plannera may send emails or other communication about services, events, or information to members. Members can opt-out of receiving emails by logging into their online account and updating their communication preference or by contacting the Plan.

If a member contacts Plannera with a comment, question or complaint by email, text message, web chat, telephone or video chat, the member may be asked for information that identifies them (such as their name, address and phone number) along with additional information we may need to promptly answer any question, or respond to any comment or complaint. We may record the conversation or retain this information to improve our member service and products and service offerings.

Plannera also periodically requests feedback from our members through surveys, and as part of the survey process, we may collect personal information.

### 8.2 Online Information Collection Purposes

We request only the information we need for regulatory purposes, income tax requirements, and to effectively deliver personalized products and services to our members.

We collect and/or maintain the IP (internet protocol) addresses of all visitors to our website and other related information such as page requests, browser type, operating system and average time spent on the website. We use this information to help us understand the activity and to monitor and improve the website.

**Cookies and Similar Technologies:** The website may use a technology called “cookies”. A cookie is a tiny element of data that a website can send to an individual’s web browser, which then may be stored on their hard drive so that individuals can be recognized when they return. If an individual has registered with the Plannera website, these cookies may let us know who they are, identify the web browser as one that has visited the website before and permission may be necessary to access your account information (stored on Plannera computers) to deliver products and personalized services.

**Analytics:** We may use third parties, including Google Analytics and Microsoft Clarity, to help us gather and analyze information about the areas visited on the website to better understand, evaluate and improve the user experience and the convenience of the website.

**Social Media:** We may offer you the opportunity to engage with our content on or through third-party social networking websites, plug-ins and applications. When you engage with our content on or through third-party social networking websites, plug-ins and applications, you may allow us access to certain information associated with your social media account (e.g. name, username, email address) to deliver content or as part of the operation of the website, plug-in or application.

**Third-party Websites:** Our website may contain links to other websites we do not own or operate. Links to our website may be featured on third party websites. Except as provided herein, we will not provide any of your personal information to these third-parties without your consent. We provide links to third-party websites as a convenience to the user. These links are not intended as an endorsement of or referral to the linked websites. The linked websites have separate and independent privacy policies, notices and terms of use, which we recommend you read carefully. We have no control over such websites, and therefore, have no responsibility, accountability or liability for the way these websites may collect, use or disclose, secure or otherwise treat your personal information.

## 9. Retention

Personal information will be retained only as long as necessary for the fulfilment of its stated collection purpose, or as specified by law. When the retention requirements have been met, appropriate measures will be taken to safely and securely dispose of records.

## 10. Your Rights and Responsibilities

You possess specific rights under Canadian privacy laws. These rights are established to empower you over the personal information we hold about you. These rights include:

- **Rights to Access:** You have the right to request access to your personal information that Plannera holds, in order to verify its accuracy and the lawful use of this information.
- **Right to Correction:** If the personal information we have about you is incorrect or incomplete, you have the right to request its correction or completion.
- **Right to Withhold/Revoke:** You can withhold or revoke your consent at any time however there may be consequences in doing so.

If you wish to exercise any of these rights, which may be subject to exceptions, or have any questions or concerns about our privacy practices, please contact Plannera's Privacy Officer.

You should review the personal information shown on your Member Statement, Retired Member Statement, Deferred Pension Statement or any other personal correspondence and report any inaccuracies to the Plan in a timely manner.

## 11. Accountability

Plannera has appointed a Privacy Officer to oversee the collection, use, and disclosure of personal information. If you would like to access your records, our Privacy Officer can provide you with information on how to submit a written request and arrange for you to see your file in person.

## 12. Privacy Officer Contact Information

Privacy Officer  
Plannera Pensions & Benefits  
110-1801 Hamilton Street  
Regina, SK S4P 4W3  
Email: [privacy@plannera.ca](mailto:privacy@plannera.ca)

## 13. Related Documents

- [\*The Personal Information Protection and Electronic Documents Act;\*](#)
- [\*Freedom of Information and Protection of Privacy Act; \(Canada\)\*](#)
- [\*Local Authority Freedom of Information and Protection of Privacy Act \(Canada\)\*](#)
- [\*Canadian Standard Association Privacy Standards \(Canada\)\*](#)
- [\*Canada's anti-spam Legislation\*](#)
- [\*The Health Information Protection Act\*](#)

### **Changes to This Personal Information and Privacy Policy**

Plannera reserves the right to update this Privacy Policy from time to time.

***This policy was last reviewed and updated on June 30, 2023.***