

PRIVACY POLICY

Protecting Your Personal Information

Introduction

Personal information is information about you of a confidential nature. It does not include the basic contact information found on a typical business card, such as your name or workplace telephone number. It does, however, include information that is not readily available to the public, such as your date of birth, salary, spousal status, home address and telephone number, etc.

The Pension Fund (1969) of The Pentecostal Assemblies of Canada is committed to respecting your right to protect your personal information. In demonstration of this commitment we have created the following Privacy Policy, which sets out the ground rules governing the collection, use and disclosure of your personal information. More specifically it includes the following:

- What type of personal information we collect
- How we collect your personal information
- When and why we disclose personal information
- How we protect your personal information
- How you can view your personal information, and
- What you can do if you have concerns about your privacy.

If you have any questions about the Privacy Policy or the use of your personal information, please feel free to contact our Client Services at 905-542-7400 or toll free at 1-866-877-8481. Alternately you can email us at pensioninfo@paoc.org.

Privacy Officer

The Pension Fund (1969) of The Pentecostal Assemblies of Canada

Personal information we collect

The following personal information is collected, used and disclosed for the sole purpose of administering the plan, your pension benefits and, after retirement, paying your pension.

Date of birth: This is used to determine your eligibility for benefits, i.e. when you retire. It is also used to project the plan's future cash-flow requirements (how much money the plan will need, and when, to pay pensions).

Home address and phone number: We use your address to send you information about your pension. For example, each year we send active members their *Annual Benefit Statement*. Your phone number is kept on file so that we can, if necessary, contact you to discuss your pension.

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.

Spousal status: Information on your spousal status is used to determine how much the plan needs to set aside now to pay pensions in the future. It typically costs more to fund pensions that include a spousal survivor benefit.

Beneficiary information: This information is required in the case of a pension member's death.

Annual earnings: Your salary is used to calculate your pension contributions. It is also used to determine your average annual salary – a figure that is used to calculate your pension.

Banking information: When you retire, we will ask you for your banking information. This is required so we can deposit your monthly pension benefit into your account.

Health status: If required, information about your health (including your medical history) is collected to determine your eligibility for disability benefits and post-retirement survivor benefits.

The long-term nature of the Pension Fund's operations requires retention of our members' personal information for an indefinite period of time.

A summary of our policy

Consent: We use either express or implied consent to use and disclose your personal information.

Identifying Purposes: When we collect your personal information, we will tell you why we need it.

Limiting Collection: We collect only the personal information necessary to administer the plan and your benefit.

Limiting Use & Disclosure: We only use or disclose personal information for the reason it was collected.

Accuracy: We make every reasonable effort to ensure personal information is accurate and up-to-date.

Safeguards: We ensure appropriate safeguards are in place to protect the confidentiality of the personal information we collect.

Openness: Information about our policies related to personal information is available to you.

Individual Access: You can arrange to review your personal information.

Accountability: A Privacy Officer has been appointed to ensure the Pension Fund complies with the principles of the Privacy Policy.

Challenges: You can ask the Privacy Officer to address any concerns you may have about the handling of your personal information.

How we collect your personal information

- 1. **From you.** Most of the information we gather from you is collected using forms. Pension Fund forms use either **express** or **implied** consent to collect, use and disclose your personal information. Forms contain a statement that either:
 - Ask for your express consent (i.e. signed authorization) to collect, use and disclose the requested information; or
 - Advise you that the Pension Fund is using your **implied** consent to collect, use or disclose your personal information.
- 2. **From your employer.** Your employer provides the Pension Fund with information about your salary, contributions, and service.

When and why we disclose personal information

From time to time the Pension Fund is required to share your information with a "third party". Third parties may include:

- Actuarial Advisors: External actuaries are retained by the Pension Fund to determine
 the funded status of the plan. Actuaries use the personal data collected by the Pension
 Fund to assess the plan's financial status, as required under the *Pension Benefits Act*.
 We only provide actuarial advisors with the minimum amount of information needed to
 perform this task.
- Canada Revenue Agency (CRA): Under tax law, the Pension Fund is required to report certain personal information to the CRA, such as your pension adjustment and social insurance number.
- Other Pension Plans: If you terminate from the plan and transfer your pension to another savings vehicle, the two plans will need to share information. At the time of the transfer you will be asked to provide consent for information sharing.
- We may also be required to provide certain information to the bank in order to pay pensions; to our auditors; and to other government or governing agencies as may be required, i.e. Financial Services Commission of Ontario (FSCO).

The Pension Fund ensures that appropriate safeguards are in place (such as locking filing cabinets and restricting access to offices as appropriate; employing technological measures, such as the use of passwords and encryption) to protect the confidentiality of all personal information collected.

Getting it right

You have a responsibility to ensure that the personal information the Pension Fund has on file for you is accurate and up to date. This ensures your benefits are properly administered and you receive your *Annual Benefit Statement* and/or important pension information in a timely manner. It also eliminates any delays in processing your benefits.

There are two ways you can check to make sure your personal information is accurate and up to date:

- 1. If you are an active member, you should check the personal information shown on your *Annual Benefit Statement*.
- 2. If you are an active or retired member, you can ask to review your personal information at any time. Simply contact our Client Services.

Address changes and banking information can be updated on our **pension portal**.

<u>To Register.</u> register.paoc.org. Next steps available upon form submission

To Connect: portal.paocpension.org. Enter your username and password

If you have questions or concerns

If you have questions or concerns about the handling or accuracy of your personal information, please contact our Client Services at 905-542-7400 or toll free at 1-866-877-8481.

Alternately, we can be reached by email at pensioninfo@paoc.org, or you can write to us:

Privacy Officer
The Pension Fund (1969) of The Pentecostal Assemblies of Canada 2450 Milltower Court
Mississauga, ON L5N 5Z6