



**Teachers'
Pension Plan
Corporation**
NEWFOUNDLAND
& LABRADOR

PRIVACY STATEMENT

The Teachers' Pension Plan Corporation (TPPC) is committed to protecting your privacy and the confidentiality of your personal information. We are pleased to provide you with the following Privacy Statement which is intended to describe, in general terms, how we collect, use, disclose and protect your personal information.

In this Privacy Statement, the term "personal information" means information about an identifiable individual. This means information where the relevant individual can be identified from the information or from the information when combined with other information that is reasonably available.

The TPPC administers the Teachers' Pension Plan (the Plan) on behalf of the active members and pensioners under the Plan (Plan Members).

Accountability

TPPC has appointed a Privacy Officer (CFO) to ensure compliance with our Privacy Statement and our personal information handling practices. This person will be responsible to oversee all the activities related to the development, implementation and adherence to the Privacy Statement.

TPPC only collects, uses and discloses personal information as reasonably necessary to administer the Plan.

Personal information that the TPPC may collect includes, but is not limited to:

- Social Insurance Number
- Date of birth
- Employment history
- Salary and benefits
- Home address and phone number
- (Home) email addresses
- Education background
- Health information
- Emergency contact details
- Photographs
- Court orders (e.g. garnishments)
- Banking information
- Marital status and dependents for survivor benefit purposes
- Pension benefits details
- Insurance and claims information necessary to administer the NLTA Group Insurance Program

The TPPC collects personal information to:

- administer the Plan;
- accurately record and validate service as reported by employers;
- provide employers with information for required contributions;
- determine benefit entitlements and process benefit applications;
- communicate information about the Plan;
- understand and analyze pension needs and develop services to inform Plan Members about how to preserve or improve their benefits;
- conduct Plan Member surveys;
- assess the quality of the service that the TPPC provides;
- to report mandatory information about Plan Members to the Canada Revenue Agency pursuant to the *Income Tax Act* (T-slips);
- comply with applicable laws; and
- administer and make payments to the group insurance administrator.

Consent

Except where there is a requirement imposed on TPPC by law to collect, use or disclose personal information, TPPC will seek your consent and notify you of the purposes for which we collect information and how we propose to use or disclose it. If TPPC proposes to use or disclose personal information for a purpose not previously identified, the new purpose will be identified prior to the new use. Unless the new purpose is required or permitted by law, the consent of the individual will be obtained before the information is used or disclosed for that new purpose. The form of consent, whether written or verbal, will vary depending on the circumstances. In determining the appropriate form of consent, TPPC will take into account the sensitivity of the personal information and the reasonable expectations of the relevant individual regarding the purposes for use or disclosure of the personal information by TPPC. If the purpose is reasonably obvious in the circumstances, we may rely on implied consent.

The TPPC will obtain the consent of relevant individuals before collecting, using or disclosing personal information for a purpose other than the purposes described in this Privacy Statement, unless otherwise permitted.

Participation in the Plan is mandatory for teachers pursuant to the *Teachers' Pensions Act 2018* (NL). The personal information that a Plan Member and his or her employer provide in relation to the Plan is collected, used or disclosed under the authority of applicable legislation, such as the *Teachers' Pensions Act 2018* (NL) and the *Income Tax Act* (Canada). A Plan Member's consent with respect to the collection, use and disclosure of personal information for the administration of the Plan is implied by their participation in the Plan and the TPPC is acting under the presumption that appropriate consent was obtained from individuals at source when their personal information is provided to the TPPC from employers or the NLTA.

Limiting Use, Disclosure and Retention of Personal Information

TPPC will not use or disclose personal information for purposes other than those for which it was collected, except with the consent of the individual, or as required or permitted by law.

Personal information will be retained only as long as is reasonably necessary for the fulfillment of those purposes.

The TPPC limits the use of personal information to administer the Plan. Examples of these activities include, but are not limited to:

- creating and maintaining a Plan Member database;
- calculating service purchase costs and past service pension adjustments;
- preparing and distributing personalized Plan Member confirmation and communication documents, including but not limited to statements and election forms;
- preparing pension and benefit estimates and summaries;
- 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 Plan Members;
- meeting legal requirements (including reporting requirements);
- preparing plan valuation and experience studies;
- facilitating general administration of the Plan; and
- facilitating general administration of the NLTA Group Insurance Program.

TPPC will use de-identified information instead of personal information where feasible.

Personal information will only be shared with employers or third parties when it is reasonably necessary for administering the Plan. 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, third party payroll processor, NLTA Group Insurance Administrator, or other service provider or contractor to the Plan). These third parties may be located in countries other than Canada.

The TPPC does not sell personal information to other organizations or individuals.

The TPPC will disclose personal information in response to a court order, subpoena, search warrant or other lawful requirement without first seeking consent, and you may not be notified of such disclosure if the legal demand prohibits such notice.

Accuracy

Much of the personal information of Plan Members is provided to TPPC by the employers of the Plan Members, who are primarily responsible for providing accurate, complete and up-to-date information. In addition, TPPC relies on individual Plan Members to provide the TPPC with accurate, complete and up to date information. The TPPC will make every reasonable effort to keep personal information provided up-to-date and accurate, including correcting any records that are shown to be inaccurate.

Individual access to information

Upon written request, the TPPC will advise individuals of the nature of their personal information collected and used. Individuals may challenge the accuracy and completeness of the information in the custody and control of the TPPC and have it amended as appropriate. A record of concerns will be made, if challenges are not resolved to their satisfaction. The TPPC will respond to access requests from Plan Members. There will be no charge for reasonable requests for such access. Upon written request, and upon confirmation of identity, the TPPC will disclose to the individual its record of personal information about that individual. The TPPC may be unable to provide access to some or all personal information about a Plan Member in certain circumstances including but not limited to those where the information:

- is unreasonably costly to provide
- contains references to other individuals
- cannot be disclosed for legal or security reasons
- is subject to legal privilege, or
- has been deleted in accordance with its data retention procedures

Safeguards

The TPPC will make reasonable efforts to protect personal information against loss or theft as well as unauthorized access, disclosure, copying, use or modification, regardless of the format in which the information is held, using security safeguards that are appropriate to the sensitivity of the personal information. TPPC policies stipulate the level of security required to protect confidential information, which includes the TPPC's 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.

Questions or Concerns

Queries regarding Privacy or to obtain access to your own personal information may be addressed to:

The Teachers' Pension Plan Corporation
130 Kelsey Drive, Suite 101 St. John's, NL A1B 0T2
Attention: CFO

Phone: 1-833-345-8772/709-793-8772

April 15, 2019