

Privacy Matters at OPTrust

A guide to understanding OPTrust's privacy policy for members and pensioners



Introduction



OPTrust recognizes the value in protecting your personal information and has created a privacy policy to deliver on that commitment.

This booklet explains OPTrust's privacy principles, and how we safeguard your personal information on record. It is an extension of OPTrust's online privacy policy at www.optrust.com.

The booklet answers a number of questions on how we use, disclose and collect your personal information. It also illustrates OPTrust's privacy principles that ensure our commitment to protecting your personal information.

Overview

When you communicate with OPTrust – whether online, over the phone or by mail – our top priority is to ensure that your personal information is always protected.

OPTrust's comprehensive privacy policy has strict principles to safeguard your personal information in our day-to-day business operations.

Our policy requires us to:

- advise you as to why we collect your personal information and what we use it for
- outline the conditions under which your personal information is disclosed to third parties
- obtain your consent to collect personal information
- ensure that your personal information is not used or disclosed for purposes other than administering pension benefits, without your consent.

OPTrust's privacy practices

Safeguarding your personal information is a top priority at OPTrust.



Personal information

Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. For example, a person's date of birth, Social Insurance Number, marital status, income, home address and home telephone number.

Personal information does not include the name, title or business address or telephone number of an employee of an organization.

OPTrust uses your personal information to administer and calculate your pension benefits and to comply with tax laws. OPTrust also requires personal information to keep you informed of changes to the OPSEU Pension Plan that may affect you. For example, every year we send out *Annual Pension Statements* and other communications which detail Plan provisions.

We inform you when there is an amendment to the Plan (e.g. Surplus Factor 80 or contribution rate increase) or important pension and tax legislation changes that may affect you or your survivors. This is why it is important for OPTrust to maintain up-to-date records, such as beneficiary information, home or e-mail addresses for our more than 82,000 members and pensioners. With correct personal information on record, OPTrust can administer your pension and pay your survivor's benefits according to your wishes when you die.

Key advantages to a privacy program

OPTrust's privacy policy informs members, pensioners, key stakeholders and employees on how we govern the use, collection, storage, sharing and destroying of personal information. The privacy policy also describes how the systems and procedures are designed to safeguard your personal information.

More specifically, OPTrust's privacy policy:

- protects your personal information on record at OPTrust
- enhances credibility and promotes continued confidence from members, pensioners and other stakeholders
- allows OPTrust to efficiently manage your personal information
- reduces our administration costs.

Simply put, it is "good business" to have a privacy program and is the appropriate way of dealing with personal information.

OPTrust's privacy practices

Administering our privacy policy

Privacy is not separate from OPTrust's business operations. Rather, it's an integral part of our day-to-day operations. That's why every OPTrust employee and external service provider adheres to our privacy principles.

At OPTrust, a "privacy mindset" in the workplace is critical to ensuring that our commitment to you is effective.

To do so effectively, OPTrust provides ongoing training and technical safeguards in the organization's day to day operations.

Organizational risks and exposures

Privacy is a significant business risk and must be managed like any other business risk. If an organization does not have a privacy program in place it risks damaging its standing with clients and business relationships. A significant privacy breach can also tarnish an organization's reputation and create overall distrust among members, pensioners, employees and industry partners.

Over the last several years, there has been considerable media coverage of privacy breaches throughout Canada. For example, a company's private medical files and personal financial data left behind a building, or an employee who stole microfiche containing income tax records at another company. Even a major financial institution was cited for failing to delete all of its customer financial files on a computer server before it was re-sold.

While these are worst-case scenarios, it's clear they can damage an organization's integrity and reputation and garner negative publicity in the media.



What actions have been taken to enhance privacy at OPTrust?

In 2003, OPTrust developed a privacy philosophy and strategy designed to create and implement a formal privacy compliance program. Through this process, OPTrust completed a thorough review of its privacy policies and practices to ensure that they were consistent with the stated privacy principles.

We have continued to provide comprehensive training to staff about privacy practices at OPTrust. We have also provided communications to members, pensioners and employers about our approach to privacy practices. In 2009, OPTrust underwent an extensive review of its privacy practices by an external consultancy firm.

OPTrust's privacy practices

Privacy Coordinator's role

OPTrust has designated a Privacy Coordinator to facilitate the organization's compliance with our policy principles. The Privacy Coordinator is responsible for ensuring appropriate privacy policies and practices are implemented.

These include:

1. developing procedures to protect your personal information
2. establishing procedures to receive and respond to your complaints or enquiries
3. assisting in the training of staff and communicating the organization's policies and practices
4. providing you with information to explain OPTrust's policies and procedures.

Limiting the use and disclosure of personal information

The disclosure of any personal information must be accompanied by consent. However, consent is not required when an organization uses a service provider to process information on its behalf or to assist the organization in fulfilling its mandate. The sharing of personal information with a third party in this context is viewed as a use of the information.

Sharing personal information is also limited to what is necessary for services rendered by a third party. OPTrust always remains accountable in safeguarding your personal information, even when it is under the care and control of a service provider.



Limiting retention of personal information

OPTrust along with other pension plans are in a unique position when it comes to collecting and retaining personal information. The nature of the pension business means that pension entitlements are often paid after a member or pensioner's death. There are also instances when challenges to eligibility status or the payout amounts are contested several years after the date of death.

The retention of records is an integral component of OPTrust's operations. If personal information is no longer required for the purpose which it was collected, care is taken in the disposal or destruction of that information to prevent unauthorized access.

OPTrust's privacy practices

Safeguarding personal information

Protecting your privacy and ensuring the security of your information has always been a top priority at OPTrust.

We use three key measures to safeguard your personal information:

- **Physical measures.** Locking filing cabinets and restricting access to offices with security access cards.
- **Organizational measures.** Staff training and awareness initiatives, visitor controls, limiting access on a "need-to-know" basis, and enforcing various policies and procedures such as the authentication of callers or clean and locked desk policies.
- **Technological measures.** Server security features, individual passwords and encryption.

OPTrust encourages you to use our *Online Services* site to communicate with us or make changes to your personal information in a secure environment. While regular e-mail is a convenient way to communicate, we advise you from using this method, since personal information may be compromised and there is a possibility that the e-mail message might be intercepted. OPTrust also provides employers with secure *Online Services* to exchange member's personal information through a protected electronic environment.

Accuracy of the personal information collected and retained

As a best practice, your personal information should be complete, accurate and up-to-date. That way OPTrust can effectively communicate plan changes or provide specific pension planning information to you. This is why it is very important that you inform OPTrust of any changes to your personal information.

Your personal information is always protected

OPTrust is committed to respecting your privacy and personal information at all levels. Our staff has always taken great care and sensitivity when dealing with your personal information. The use, collection and disclosure of your personal information will continue to be very important to us.

We will continue to assess the impact of any business changes and ensure that our business practices meet or exceed the established privacy standards. OPTrust will also continue to keep you informed about any steps that we are taking in this regard.

OPTrust's privacy practices

What can you do?

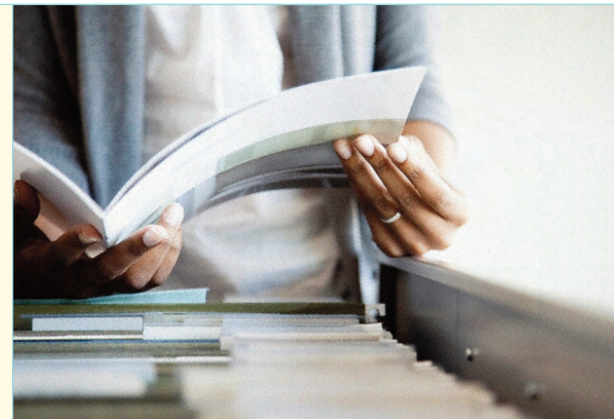
Here are some quick reminders to protect your personal information at OPTrust.

- ✓ When you visit OPTrust in person, bring two pieces of identification, including one with a photo (e.g. driver's licence, health card, passport, etc.).
- ✓ Do not share your secure *Online Services* password or verification questions and answers with anyone.
- ✓ When communicating with OPTrust electronically – send your message through your secure *Online Services* account or the "Contact Us" section on our website. Both options use encrypted technology unlike regular e-mail.
- ✓ Use your OPTrust ID number when communicating with OPTrust.
- ✓ Keep your personalized pension information, such as your *Annual Pension Statement* in a safe place along with other important financial documents.
- ✓ Inform OPTrust of your new home address. If you move we can continue to provide you with important information about your pension.

Want more information?

For more information or questions regarding OPTrust's privacy policy and procedures, please contact OPTrust's Privacy Coordinator at privacy@optrust.com.

The full privacy protocol is available on the OPTrust website.



Member and Pensioner Services:
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OPSEU Pension Trust

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