



**J.J. MCATEER & ASSOCIATES INCORPORATED
EMPLOYEE BENEFIT PLAN SERVICES LIMITED
PRIVACY POLICY
DISCLOSURE OF PERSONAL INFORMATION**

Personal Information - Personal Information includes any factual or subjective Information, recorded or not, about an identifiable individual. This includes Information, in any form, such as:

- age, name, ID numbers (including Social Insurance Numbers), income, ethnic origin, or blood type;
- opinions, evaluations, comments, social status, or disciplinary actions;
- employee files, credit records, loan records, medical records

Personal Information is not - Personal Information does not include the name, title or business address or telephone number of an employee or a member of an organization.

Privacy of Personal Information is the cornerstone of our office procedures and policies. We understand the importance of protecting Personal Information. We are committed to collecting, using and disclosing Personal Information responsibly. We also try to be as open and transparent as possible about the way we handle Personal Information.

All Staff who come into contact with Personal Information are aware of the sensitive nature of the Information that you have disclosed to us. They are all trained in the appropriate uses and protection of Personal Information. Our Staff ensures that:

- Only necessary Information is collected;
- We only share Information with consent;
- Storage, retention and destruction of Personal Information complies with existing legislation;
- Our privacy protocols comply with privacy legislation and standards of the regulatory authorities.

Our office adheres to the following 10 principles of the Canadian Standards Association's (CSA) Model Code for the Protection of Personal Information respecting privacy:

1. Accountability - Our organization is responsible for Personal Information under our control. We have designated individuals who are accountable for our organization's compliance with the following principles.

2. Identifying Purposes - The purpose for which Personal Information is collected shall be identified at or before the time the Information is collected.

3. Consent - The knowledge and consent of the individual are required for the collection, use, or disclosure of their Personal Information, except where inappropriate.

4. Limiting Collection - The collection of Personal Information shall be limited to that which is necessary for the purposes we have identified. Personal Information shall be collected by fair and lawful means.

5. Limiting Use, Disclosure, and Retention - Personal Information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal Information shall be retained only as long as necessary for the fulfilment of those purposes.

6. Accuracy - Personal Information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which is to be used.

7. Safeguards - Personal Information shall be protected by security safeguards appropriate to the sensitivity of the Information.

8. Openness - We shall make readily available specific Information about our policies and practices relating to the management of Personal Information.

9. Individual Access - Upon request, an individual shall be informed of the existence, use, and disclosure of his or her Personal Information and shall be given access to that Information. An individual shall be able to challenge the accuracy and completeness of the Information and have it amended as appropriate.

10. Challenge Compliance - An individual shall be able to address a challenge concerning our compliance with the above principles to the designated individual or individuals accountable for our privacy practices.

How we Collect, Use and Disclose Plan Members' Personal Information

We understand the importance of protecting your Personal Information. To help you understand how we are doing that, we have outlined here some basic information about how our office is using and disclosing your Personal Information.

Our office will collect, use and disclose Information for the following purposes:

- to confirm identity, and protect against errors, fraud or other misrepresentations;
- determine eligibility for services;
- to enable us to contact you;
- to establish and maintain communication with you;
- to comply with a variety of legal requirements, including any tax reporting obligations under the Income Tax Act;

Access to your Personal Information will only be provided to:

- Those employees who need the Personal Information during the performance of their duties to determine the benefit entitlements payable under the terms of the Plan;
- The Board of Trustees governing the Plan, if such Personal Information is required to permit them to carry out their fiduciary duties;
- To Local Union(s) and Insurance Carriers in order to maintain and authorize payment;
- Any person or organization who has been given consent; and
- Anyone who is otherwise authorized by law.

We protect and store your Personal Information by:

- Using your Personal Information only for the purpose for which it is collected and keeping this Information in the strictest of confidence;
- Maintaining electronic files and hard copies of Personal Information;
- Hard copies maintained on site are locked in storage rooms and locked filing cabinets;
- Only authorized employees have access to records during regular business hours;
- Electronic systems are secure and require passwords;
- We have a system of file backup.

Our office will not, under any conditions, supply medical history without specific consent.

When unusual requests are received, we will contact you for permission to release such Information.

You may withdraw your consent for use or disclosure of your Personal Information, and we will explain the ramifications of that decision.

Do not hesitate to discuss our Policy with our Privacy Officer. Please be assured that every employee is committed to ensuring that you receive the best quality service. If you have any questions or concerns about our Privacy Policy, please contact the Privacy Officer at one of our locations listed below:

Ontario Office

45 McIntosh Drive
Markham, Ontario
L3R 8C7

Tel: 905-946-8655

Fax: 905-946-2535

Alberta Office

16214 - 118 Avenue
Edmonton, Alberta
T5V 1M6

Tel: 780-452-1331

Fax: 780-487-4063

British Columbia Office

4510 Dawson Street
Burnaby, B.C.
V5C 4C1

Tel: 604-298-5411

Fax: 604-298-5833