



Privacy Policy

August 2024

www.cupe-ewbt.ca

CUPE Education Workers' Benefits Trust

La Fiducie d'avantages sociaux des travailleuses et des travailleurs de l'éducation du SCFP

Introduction

The CUPE Education Workers' Benefits Trust ("EWBT") is an employee life and health trust providing life, health and dental benefits to eligible CUPE members.

The Board of Trustees of the EWBT and its staff are committed to protecting privacy and safeguarding personal information. As part of its commitment, the EWBT established this Privacy Policy which describes how it collects, uses, discloses and protects personal information.

The Privacy Policy is modelled after the principles contained in the federal Personal Protection and Electronic Documents Act (PIPEDA).

Application of this Policy

This Privacy Policy applies to the personal information of all beneficiaries ("Beneficiaries") receiving benefits provided through the EWBT, EWBT employees and Board Members. All EWBT employees, personnel engaged by the EWBT to provide services (such as the third-party administrator and other service providers, independent contractors, consultants), and the Board Members must comply with this Policy. This Privacy Policy applies to personal information that the EWBT accesses in writing or verbally, over the phone, by electronic transmission or in-person. Personal information transmitted to or from the EWBT is subject to this Privacy Policy.

What is personal information?

Personal information is information about an identifiable individual which is private in nature and not readily available to the public.

What personal information does the EWBT collect?

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

- Contact information like name, address, telephone number and email address;
- Biographical data like sex, date of birth, spousal status and dependents;
- Employment information including the name of your employer, employment status, employment dates, bargaining agent and unit;
- Social Insurance Number;
- Benefit coverage selections;
- Medical evidence of insurability;

- Medical history and documentation;
- Emergency contact details;
- Banking information; and
- Other information with your consent or as permitted or required by the Income Tax Act (Canada) and applicable law.

Privacy Principles

1. Accountability

The EWBT is responsible for personal information under its control and designates a Privacy Officer who is accountable for the organization's compliance with the following principles, receiving complaints and investigating privacy incidents. The name and contact information of the Privacy Officer is identified at the end of this document.

2. Identifying Purposes

The EWBT collects personal information about Beneficiaries to:

- Enroll eligible members for benefits;
- Administer employee benefits;
- Accurately record and validate coverage as reported by employers;
- Receive required contributions;
- Determine benefit entitlements and process benefit applications;
- Communicate information about employee benefits;
- Understand and analyze benefit needs and funding needs;
- Conduct Member surveys;
- Comply with the income tax act and other applicable laws.

3. Consent

Member knowledge and consent are needed for the collection, use, or disclosure of personal information, except where inappropriate.

Member consent to the EWBT's collection, use, and disclosure of personal information may be given in various ways. Consent can be expressed (e.g. orally or in writing, including by signing an enrolment form outlining the intended uses and disclosures of personal information) or implied (for example when you provide information necessary for an explanation of your benefits). Consent may be given by your authorized representative (such as a legal guardian or a person having a power of attorney). Generally, by providing the EWBT with personal information, we will assume that you consent to our collection, use, and disclosure of such information for the purpose identified or described in this Privacy Policy, if applicable, or otherwise at the time of collection. If you provide the EWBT with personal information about a third party such as a spouse or dependent, we will assume that you have the consent of that third party to provide their Personal Information to the EWBT.

The EWBT will obtain the express consent of Members, if applicable, before collecting, using or disclosing personal information for a purpose other than the purposes described in this Privacy Policy, unless otherwise permitted or required by law.

When you enroll in the EWBT, your consent will be valid for so long as necessary to fulfil the purposes described in this Privacy Policy or otherwise at the time of collection, and you may not be permitted to withdraw consent to certain necessary uses and disclosures (for example, but not limited to, maintaining reasonable administration and transaction records, disclosures to government entities as required to comply with laws).

4. Limiting Collection

The EWBT will collect only the personal information required for the purposes described in this Privacy Policy and will do so only by reasonable and legal means.

5. Limiting Use, Disclosure and Retention

The EWBT limits the use of personal information about Beneficiaries to administer employee benefits. Examples of these activities include, but are not limited to:

- creating and maintaining a Member database;
- preparing and distributing personalized Member forms and communication documents, including but not limited to statements and election forms;
- collecting contributions;
- preparing benefit summaries;

- verifying eligibility of claims for benefit entitlement;
- calculating and paying benefits and issuing tax receipts;
- verifying identity when responding to inquiries or requests for information from Beneficiaries;
- meeting legal requirements (including reporting requirements);
- preparing benefit plan valuation and experience studies; and
- facilitating general administration of employee benefits.

Personal information may only be shared with participating employers or third parties when it is necessary for administering employee benefits. For example, third parties may include the administrator, the insurers, a financial institution from or to whom contributions or payments are required to be made, another employee life and health trust, or other service providers (for example actuary, auditor, legal advisor, or other service provider or contractor to the EWBT). These service providers are subject to contractual or other measures to protect your personal information while processed or handled by them.

The EWBT 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.

Personal Information is retained only so long as it is reasonably needed to fulfill the purposes set out above.

The EWBT and its service providers may de-identify personal information which is the subject of this privacy policy and aggregate the data for their respective business purposes, such as statistical or analytic assessments. The aggregated data may be disclosed to third parties. Individuals to which this Privacy Policy applies cannot be personally identified from the de-identified/aggregated data.

6. Accuracy

The EWBT strives to ensure the personal information collected from Beneficiaries is current and accurate as is necessary to fulfill the purposes for which it was collected. The EWBT asks participating employers to provide correct, up-to-date, and complete personal information about Beneficiaries who are covered by the EWBT. Beneficiaries are encouraged to review and correct their personal information intermittently, and the EWBT will make every reasonable effort to record and update accurate personal information on an ongoing basis.

7. Safeguarding your information

The EWBT will protect personal information with appropriate safeguards and security measures according to its sensitivity. The EWBT will make every reasonable effort to protect personal information against loss or theft as well as unauthorized access, disclosure, copying, use, or modification.

If personal information is to be handled by a third party on behalf of the EWBT, the EWBT will enter into contractual arrangements with the third party to impose appropriate security standards to guard against unauthorized use, modifications, or loss of personal information.

8. Openness

This Privacy Policy is available to anyone requesting information about the EWBT's policies and practices relating to the management of personal information. Any questions or concerns may be addressed to the Privacy Office identified in this document.

9. Individual access to information

Upon written request, the EWBT will advise Beneficiaries of the nature of their personal information collected and used. Beneficiaries may challenge the accuracy and completeness of the information and have it amended as appropriate. A record of Beneficiaries' concerns will be made if challenges are not resolved to their satisfaction.

The EWBT will respond to access requests from Beneficiaries, and there will be no charge for reasonable requests for such access. Upon written request, and upon confirmation of identity (whether orally or in writing), the EWBT will disclose to a Member our record of personal information about that Member.

The EWBT may be unable to provide access to some or all personal information about a 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.



Inquiries or Complaints

Member questions or complaints regarding this Privacy Policy may be addressed to:

Managing Director
CUPE Education Workers' Benefits Trust
304 Toronto Street South, Unit 204
Uxbridge, ON L9P 1Y2
info@cupe-ewbt.ca
www.cupe-ewbt.ca

It is the responsibility of all EWBT employees, personnel engaged by the EWBT to provide services (such as third-party service providers, independent contractors, consultants, or the personnel of a company engaged by the EWBT to provide services), and Board Members to comply with this Policy and report breaches of this Privacy Policy.

This Privacy Policy may be amended from time to time and will be reviewed at least every 3 years by the Board of Trustees.