

PRIVACY POLICY

1. Application of Privacy Policy

This Privacy Policy applies to the collection, use, disclosure, retention, accuracy and safeguarding of personal information by the Civil Service Superannuation Board and its employees and agents (collectively, the “**CSSB**”) in relation to the following plans:

- The Civil Service Superannuation Fund;
- The Public Service Group Insurance Fund (including Life Insurance Plan, Accidental Death and Disablement Insurance Plan and Dependents Insurance Plan);
- The Civil Service Superannuation Board Money Purchase Plan;
- The Manitoba Legislative Assembly Pension Plan;
- The Legislative Assembly Pension Plan;
- The Centra Gas Pension Plans;
- The Winnipeg Child and Family Services Employees Benefits Retirement Plan; and
- The Manitoba Telecom Services Inc. and Participating Subsidiaries Employee Pension Plan.

The above-noted plans are hereinafter referred to collectively as the “**Plans**” and individually as a “**Plan**”. “**Applicable Plan(s)**” means the Plan(s) relevant to a specific individual.

2. Personal Information

In this Privacy Policy, “**personal information**” means recorded information about an identifiable individual and includes, but is not limited to, an individual's name, address, telephone number, email address, age, sex, personal health information, education, employment and educational and employment history.

The CSSB collects, uses, discloses and retains personal information about prospective, current and former members of the Plans, living and deceased, as well as the former and current spouses, common-law partners, children, dependents and beneficiaries of the prospective, current and former members of the Plans.

The extent of the personal information collected, used, disclosed and retained by the CSSB about an individual varies depending on the nature of the individual's relationship to the Plans (i.e. whether the individual is a current, former or prospective member or current or former spouse, common-law partner, child, dependent or beneficiary of a current, former or prospective member).

The CSSB collects personal information in the following ways:

- Voluntarily from the individual that information is about;
- From the Civil Service Commission (Manitoba), as permitted under *The Civil Service Superannuation Act* (Manitoba);
- From participating employers under the Applicable Plan(s); and
- Through other persons or methods of collection that are authorized by the individual or under applicable legislation or the Applicable Plan(s).

3. Limits on the Collection of Personal Information

The CSSB only collects personal information that relates directly to and is necessary for the proper administration of the Plans. Accordingly, the CSSB collects personal information required to perform administrative functions including, but not limited to:

- (a) identifying and enrolling individuals in the Plans;
- (b) maintaining and updating records relating to members of the Plans;
- (c) collecting required fees, premiums, dues and contributions;
- (d) producing and issuing personalized statements and other documents;
- (e) determining benefit entitlement and eligibility;
- (f) assessing and adjudicating claims;
- (g) communicating with members and responding to inquiries;
- (h) developing and enhancing its services;
- (i) providing valuation or other data to actuaries and consultants to the Plans; and
- (j) fulfilling reporting requirements and otherwise complying with applicable legislation.

When an individual provides personal information to the CSSB, whether verbally, in writing or by electronic means, including through the completion of an application, notice or other form, the CSSB will use it for the purpose of the proper administration of the Applicable Plan(s). The CSSB only collects as much information about an individual as is necessary for the proper administration of the Applicable Plan(s).

4. Limits on the Use and Disclosure of Personal Information

The CSSB does not use or disclose the personal information that it collects about an individual for any purpose other than the proper administration of the Applicable Plan(s) without first obtaining the consent of the individual, except where the CSSB is otherwise required or permitted to do so by law. Furthermore, the CSSB only uses and discloses personal information to the extent necessary to accomplish the particular purpose for which it is used or disclosed.

The CSSB limits the use and disclosure of personal information to those of its employees and agents who have been specifically authorized to use the information and are required to use the information to ensure the proper administration of the Applicable Plan(s).

The CSSB does not sell personal information to any individuals or organizations for any purpose.

5. Ensuring the Accuracy of Personal Information

The CSSB strives to ensure that all of the personal information that it collects is accurate, up to date and complete at the time of collection, throughout the period of retention and, particularly, prior to the use or disclosure of the personal information.

In order to assist with the continued accuracy and completeness of its records, the CSSB asks members to review the statements and documents issued to them in connection with the Applicable Plan(s) including, without limitation, Annual Employee Pension Statements and Monthly Pension Statements, and to notify the CSSB of any errors or omissions or changes to their personal information.

The CSSB endeavours to address and respond to any such notice in a timely manner. Where the CSSB refuses to make a requested correction, addition or change to a member's personal information, it will include the reasons for its refusal in its response.

6. Safeguarding of Personal Information

The CSSB has implemented physical, administrative and technological security measures to protect the personal information that it retains against risks such as unauthorized access, use, disclosure and destruction. As part of these measures, the CSSB provides all of its employees with privacy training and requires each employee to agree to specific confidentiality provisions.

The CSSB reviews and continues to develop its security measures on a regular basis to ensure that all such measures remain effective and up-to-date.

7. Ensuring Individual Access to Information

All requests for access to personal information retained by the CSSB should be made in writing and directed to the CSSB Privacy Officer as set out in Section 8 of this Privacy Policy.

The CSSB endeavours to assess and respond to each access to information request in a timely manner.

The CSSB may refuse access to the personal information that it retains in accordance with any Access to Information Policy that it may implement and any applicable legislation. Where the CSSB refuses a request for access to information, it will include the reasons for its refusal in its response.

8. Accountability and Openness

The CSSB Privacy Officer is responsible for monitoring and promoting compliance with this Privacy Policy and for overseeing all other matters related to privacy and the treatment of personal information by the CSSB.

All enquiries and complaints relating to this Privacy Policy and the treatment of personal information by the CSSB should be made in writing and directed to the CSSB Privacy Officer at the address below:

The Civil Service Superannuation Board
1200-444 St. Mary Avenue
Winnipeg, MB R3C 3T1
Facsimile: (204) 945-0237
E-mail: privacyofficer@cssb.mb.ca
Attention: Erin Polcyn Sailer, Privacy Officer

The CSSB endeavours to address and respond to all general enquiries and complaints openly, accurately, and completely within a reasonable amount of time.

Where the CSSB determines, in its sole discretion, that a complaint is justified, it will take appropriate measures to address the complaint, which may include, without limitation, the review and amendment of this Privacy Policy and related policies and practices. The CSSB will

advise the individual who made the complaint of the steps taken to address their concerns as part of its response to the complaint.

Last Updated: July 7, 2022