

**PRIVACY POLICY AND PROCEDURES
OF
ELCIC GROUP SERVICES INC. (GSI)**

Purpose and Application

ELCIC Group Services Inc. (GSI) is committed to protecting the privacy and confidentiality of personal information under its custody or control. GSI recognizes and respects the right of privacy of individuals with respect to their personal information.

The primary objective of GSI's Privacy Policy is to ensure GSI meets its obligations under applicable privacy law. As GSI conducts business in multiple jurisdictions, the 10 Privacy Principles contained in Canada's *Personal Information Protection and Electronic Documents Act* ("PIPEDA"), which form the basis for much of the privacy law in force in Canada, form the basis of this Policy. As a result, this Policy presents a standard for privacy compliance that is applicable to GSI, company-wide. This Privacy Policy refers to and incorporates the provisions of PIPEDA, with specific reference to the ten principles of the Canadian Standards Association's Model Code for the Protection of Personal Information, which forms the base for that law.

GSI will review its Privacy Policy at least every five years to ensure it is relevant and remains current with changing technologies and the evolving needs of GSI and its members. In addition, as privacy laws applicable to GSI may change from time to time, this Privacy Policy will be amended accordingly.

GSI handles personal information in a variety of ways in the course of daily service delivery. This Privacy Policy balances GSI's need to collect and use personal information for business purposes with the individual's right to the protection of personal information. This policy applies to GSI's collection, use and disclosure of personal information and is subject to the requirements and provisions of Part 1 of PIPEDA, the regulations enacted there under, and any other applicable legislation, regulations or agreements.

Definitions

Collection - The act of gathering, acquiring, recording, or obtaining personal information.

Consent - Voluntary agreement with the collection, use and disclosure of personal information for defined purposes. Consent can be either express or implied and can be provided by the individual or by an authorized representative.

Member - An individual who is enrolled in a pension plan and/or benefits plan which is administered by Group Services Inc. (GSI).

Disclosure - Making personal information available to a third party.

Personal Information - Information about an identifiable individual, but does not include the name, title, business address or telephone number of an employee of an organization (for example information provided on a business card). Personal information includes any factual or subjective information, recorded or not, about an identifiable individual. This includes information in any form. Personal information does not include de-identified or aggregated information that cannot be associated with a specific individual.

Third Party - An individual or organization outside of GSI.

Use - The treatment, handling, and management of personal information by and within GSI.

Privacy Policy and Procedures

(1) Accountability

GSI is responsible for maintaining and protecting all personal information under its care or control. GSI has designated a Privacy Officer to be accountable for GSI's compliance with PIPEDA and other applicable privacy law, and this Privacy Policy.

All persons, whether employees, contractors, board or committee members who collect, process or use personal information, will be accountable for such information to the Privacy Officer.

GSI implements policies and procedures to give effect to the GSI Privacy Policy, including:

- (b) procedures to protect personal information;
- (c) procedures to receive and respond to complaints and inquiries;
- (d) training staff and communicating to staff information about GSI's policies and practices; and
- (e) developing information to explain GSI's policies and practices.

In addition, GSI's obligations with respect to personal information extend to personal information that GSI provides, or with respect to which it allows access, to third party contractors. In any situation where personal information under GSI's control will be disclosed to or accessed by a third party contractor, the GSI employee responsible for the relevant transaction or project shall ensure that an appropriate written confidentiality agreement is in place with the third party contractor. All such agreements shall be reviewed and approved by GSI's Privacy Officer. At the termination of any such contract, the contractor must confirm the return or destruction of all personal information in all formats or media.

(2) Identifying purposes for Collection of Personal Information

Wherever possible, GSI collects information directly from the subject individual, including but not limited to, on enrollment forms and through direct interactions. GSI also collects information from various third party sources such as subscribed employers and government agencies.

GSI identifies the purposes for which personal information is collected at or before the time the information is collected.

The purposes for which GSI collects personal information include the following:

- (a) to maintain membership information and to create a mailing list for distribution of GSI communications;
- (b) to meet legal and financial requirements;

- (c) to establish and verify the identification of a member;
- (d) to verify eligibility for participation in pension or benefit plans, including in connection with the subscribing employer;
- (e) to provide and administer products and services, including pension and benefit plans;
- (f) to facilitate the delivery of benefits, products and services for which the member has subscribed, including in connection with third party benefit providers and administrators, insurers, and benefits consultants;
- (g) to inform members of products and services, and communicate with members regarding GSI's activities, products and services;
- (h) to understand member needs and preferences;
- (i) to verify personal information with government agencies, insurers, benefit providers, insurance reporting agencies, and credit bureaus;
- (j) to facilitate payment of premiums and fees by members;
- (k) to investigate and pay claims;
- (l) to detect, combat and prevent fraud or other illegal activities; and
- (m) for any other purpose authorized or required by law.

(collectively, the "Authorized Purposes")

GSI notifies the individual of the purpose for which personal information is collected at or before the time it is collected. Persons who collect personal information on behalf of GSI are able to provide information that explains the purposes for which it is being collected.

GSI obtains the individual's consent before using or disclosing personal information for a new purpose, unless the new purpose is required by law.

(3) Obtaining Consent for Collection, Use or Disclosure of Personal Information

The knowledge and consent of an individual is required for the collection, use, or disclosure of personal information, except where the law provides an exemption.

GSI will ensure that the individual from whom personal information is collected consents to the collection and to the manner in which it will be used and disclosed. GSI will further ensure that the individual can reasonably understand why and how the information will be used when consent is given.

GSI's standard form documents (such as plan enrollment forms) contain consent clauses designed to help ensure compliance with this principle.

GSI has reviewed the types of personal information that it collects to ensure each type of personal information is reasonably necessary to fulfill specified and legitimate purposes (i.e. the Authorized Purposes). As such, although GSI will ensure that an individual may withdraw consent at any time, it is generally a condition for the supply of GSI products and services, including enrollment in pension and benefit plans, that the consents requested via GSI's standard form documents and consent processes are obtained. GSI will inform individuals of the implications of withdrawal, and reserves the right to refuse to provide any products or services, or to complete enrollment of an individual in a pension or benefit plan, in the event that individual refuses to provide the consent requested via GSI's standard form documents and consent processes.

(4) Limiting Collection of Personal Information

GSI limits the collection of personal information to that which is necessary for the purposes identified by GSI, and does not collect personal information beyond what is reasonably necessary in support of an Authorized Purpose.

GSI does not collect personal information indiscriminately. GSI will ensure that information is collected only by fair and lawful means without misleading or deceiving individuals as to the reason.

(5) Limiting Use, Disclosure, and Retention of Personal Information

GSI does 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.

More specifically, all personal information collected is used by GSI in furtherance of an Authorized Purpose. In addition, GSI may disclose personal information outside of GSI in furtherance of an Authorized Purpose.

In some situations, use or disclosure of personal information for a purpose other than an Authorized Purpose may be required or authorized by law. Such legal requirements will override this Privacy Policy. For example:

- GSI may provide personal information to a government body or law enforcement where requested to do so and where authorities provide the correct documentation; and
- GSI may provide personal information as part of a court proceeding where requested and where authorities provide the correct documentation.

GSI will retain personal information in accordance with documented guidelines and procedures established by GSI. GSI keeps personal information only as long as it remains necessary or relevant for the identified purposes or for fiscal, legal, or operational requirements.

GSI retains personal information only as long as necessary for the fulfillment of the relevant purpose, and disposes of, anonymizes or destroys personal information, in a secure manner, that no longer requires retention.

(6) Accuracy of Personal Information

GSI makes reasonable efforts to ensure personal information it maintains and stores is accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used. However, individuals are relied upon to inform GSI of changes to their personal information.

(7) Safeguarding Information

GSI protects personal information against loss or theft, unauthorized access, disclosure, copying, use, modification or destruction, with security safeguards appropriate to the sensitivity of the personal information. GSI protects personal information regardless of the format in which it is held.

GSI uses care in collecting, storing, using transmitting and disposing of or destroying personal information, to prevent unauthorized parties from gaining access to the information.

Such safeguards include:

- (a) Need to Know Access: GSI personnel are only permitted to access personal information as may be necessary to fulfill legitimate job functions.
- (b) Transmittal of Information: GSI uses reasonable care to ensure that the method of transmitting personal information (whether by telephone, mail, fax, e-mail or otherwise) is sufficiently secure, taking into account the sensitivity of the information.
- (c) Secure Storage: Documents containing personal information are held in secure storage. They are removed from storage only if they are being worked with, and are returned as soon as possible.
- (d) Passwords/Access Cards: GSI personnel are required to protect the security of their computer passwords, building access cards and any other security codes or devices issued to them. GSI personnel are required to refrain from sharing such codes or devices with any person.
- (f) Security Incidents: GSI personnel who become aware of any security related incident, or suspect the occurrence of any security related incident, are required to report the matter to appropriate GSI management and co-operate in the investigation or further reporting of any such incidents, as may be appropriate.
- (g) Computer Workstations/Laptops: Electronic information is kept secure in the systems that it is stored in. Computer screens that contain or display personal information are not to be left open beyond the time required for GSI personnel to process the transactions requested of them.
- (h) Personnel/Contractor Security: GSI takes reasonable steps to ensure that only GSI personnel and contractors who have a need to know are authorized to access sensitive IT systems, information or assets. GSI documents the issuance and retrieval of security related items such as User ID's, passwords, keys, codes, combinations and badges, and will, where appropriate, obtain confidentiality agreements from personnel and contractors that may access

personal information on behalf of GSI. On termination or transfer of GSI personnel, GSI takes appropriate steps to revoke access privileges (e.g. User IDs and passwords) to applicable systems and secure areas, and retrieve sensitive information including access control items (e.g. keys and badges).

- (i) Disposal of Records: All documents containing personal information are securely shredded prior to disposal.

GSI protects personal information disclosed to third parties by contractual agreements or understandings stipulating the confidentiality of the information and the purposes for which it is to be used.

All GSI employees and Board members with access to personal information are required, as a condition of employment or Board membership, to respect and maintain the confidentiality of personal information to which they may have access.

(8) Openness Concerning Policies and Practices

GSI will make readily available to individuals specific information about its policies and procedures relating to the management of personal information upon request.

GSI is open about its policies and practices with respect to the management of personal information. Information about GSI policies and practices are readily available in a form that is generally understandable.

The information made available includes:

- (a) the name or title, and the address, of the individual who is accountable for GSI's policies and practices and to whom complaints or inquiries can be forwarded;
- (b) the means of gaining access to one's own personal information;
- (c) a description of the type of personal information held by GSI, including a general account of its use;
- (d) a copy of any information that explains GSI's policies, standards or codes; and
- (e) what, if any, personal information is made available to related organizations.

(9) Individual Access to Personal Information

Individuals have the right to access the personal information that GSI may hold about them, challenge the accuracy and completeness of such information, and have it amended.

Upon request to the Privacy Officer, GSI will inform an individual of the existence, use, and disclosure of his or her personal information, will give the individual access to that information, and/or will amend inaccurate or incomplete personal information, subject to any applicable exceptions or exemptions under applicable privacy law. Where appropriate, the amended information will be transmitted to third parties having access to the information in question to ensure continued accuracy. Amendments may involve the correction, deletion or addition of information.

In order to safeguard personal information, an individual may be required to provide sufficient identification information to permit GSI to account for the existence, use and disclosure of personal information and to authorize access to the individual's file. Any such information is used only for this purpose.

GSI responds to a written request for information within a reasonable time and at minimal or no cost to the individual. The requested information will be made available in a generally understandable form with abbreviations or codes explained.

(10) Challenging Compliance

Upon written request, an individual will be able to address a challenge concerning compliance with the above stated policies to the Privacy Officer of GSI.

GSI maintains procedures for addressing and responding to all inquiries or complaints about GSI's policies and practices relating to the handling of personal information. The Privacy Officer will investigate all complaints received, and if the complaint is found to be justified, appropriate steps will be taken to correct and resolve the complaint. The individual is informed of the outcome of the investigation regarding his or her complaint. If the individual is not satisfied with the outcome of the investigation, they have the right to pursue the issue with the Privacy Commissioner of the Province in which they reside.