



**LOCAL 213 ELECTRICAL WORKERS' WELFARE AND PENSION
PLAN**

PROTECTION OF PRIVACY POLICY

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December 2022

Local 213 Electrical Workers' Welfare and Pension Plan (EWWP/the Plans) are hour bank pension and welfare plans which provide benefits to members of contributing eligible employers. Private information is collected during the course of business in order to ensure proper administration of pension and welfare benefits according to the plan documents and done so in a manner to conform to with any prevailing legislative requirements.

The Plan respects the privacy of its members and website users. We are committed to protecting the privacy of the personal information we gather and retain for administrative purposes.

This Protection of Privacy Policy documents the protocols and procedures surrounding use of personal information. It documents how we collect information, how consent is tracked, safeguarded, and destroyed and how the Plan responds to privacy breaches. It also summarizes how Members can correct their personal information to ensure accuracy of records.

This Policy is supported by Personal Information Protection and Electronic Documents Act (PIPEDA) (Canada) and the Personal Information Protection Act (PIPA) (British Columbia).

The Plans, the Trustees and/or the Director may review and change this Protection of Privacy Policy from time to time.

PURPOSE FOR COLLECTION, TYPES AND USE OF PERSONAL INFORMATION

Member Information

The EWWP only collect personal information that is required. This information includes a member's:

- name
- address
- e-mail address
- telephone and/or facsimile number(s)
- social insurance number
- gender

- date of birth
- date of union membership
- occupation
- employer's name
- date of hire or dispatch
- record of financial contributions to the plan and hours worked and earned
- spouse/dependent name(s), gender, and birthdates
- approval of disabled status by CPP or EI, as required to pay the Welfare Plan's Wage Indemnity or Income Continuance benefits
- medical information in the form of a physician's statement as required to pay the Welfare Plan's Wage Indemnity or Income Continuance benefits
- optical, dental, orthodontic information, as required to reimburse members for submitted expenses under the Welfare Plan

We use the contact information to communicate with our members by e-mail, telephone, fax, and post, as well as to issue EWWP payments. We use the statistical information to track and report payments, determine eligibility, and develop policies.

Currently, some individual office staff separately collect and retain contact information with respect to the persons with whom they routinely communicate. This information is comprised of names, addresses, telephone numbers, and sometimes personal email addresses, when confirmed it is the sole email address of the member.

RESPONSIBILITIES

The Privacy Officer

The EWWP is responsible for personal information under its control and has designated a Privacy Officer who is responsible for compliance with this policy. All questions, complaints, or concerns with this Policy should be made in writing and will be directed to the attention of the Privacy Officer:

Privacy Officer - Hileray Kilback
1424 Broadway Street, Port Coquitlam, BC V3C 5W2
E-mail: info@213benefits.org

Employees

Employees of the EWWP office are responsible for the gathering, inputting, safe handling/storing and the necessary disclosure of any personal information they come in contact in accordance with the procedures as detailed within this Policy.

Members and Participating Employers

Members of the EWWP are responsible for providing and maintaining up to date information as required to facilitate accurate Welfare and Pension plan payments. Participating employers are responsible for timely and accurate submission of hours and relevant contributions for their employees and ensuring their submissions are sent in a manner to protect any personal information (i.e. via password protected electronic documents, FTP submission, or via mail/fax).

CONSENT FOR COLLECTION

Member's consent is needed for the collection of sensitive personal information required for the administration and payment of Welfare and Pension benefits. The EWWP obtains consent via paper enrollment/application forms and beneficiary forms which Members complete to enroll in the Plans upon meeting eligibility requirements or for payment of benefits.

DISCLOSURE

Member Information

The EWWP discloses some or all the personal information it has about its members on a need-to-know basis to the following entities:

- Canada Customs and Revenue Agency
- Pacific Blue Cross/BC Life
- Medical Services Plan of BC
- Homewood Health
- ALAVIDA
- PENAD (our pension/welfare administration platform developer)
- Human Resources and Development Canada
- British Columbia Labour Relations Board
- Canada Labour Relations Board
- International Office of the IBEW
- Construction Industry Rehabilitation Plan (CIRP)
- ECA/Local 213 of the IBEW Joint Training Committee
- your employer, and/or the business offices of other IBEW local unions in Canada and the United States
- The EWWP Trustees, on an ad-hoc basis, primarily in the event of a member's appeal on an administration decision made with respect to pension/welfare benefits.

Consultant/Advisor Information Sharing

The EWWP employs information systems consultants to build and maintain its information systems. Due to the nature of their work, these organizations have access to our members personal information (PENAD, as mentioned above). Accordingly, we require such organizations to provide an assurance that they will not retain or disclose

this information. Currently, our information systems consultants are Nucleus Networks and Sage 300.

The EWWP also utilizes actuarial consultants and auditors to review plan information and prepare financial assessments/statements and actuarial valuation reports. These reviews are required or mandated as necessary for proper governance. As part of these reviews, member information is shared, as required, in order these parties can perform their calculations. Member information is always sent in a secure format, i.e. via an FTP secure file shared platform.

Except as hereinafter described, The EWWP does not disclose a member's personal information to other Members or to any additional agencies or organizations without obtaining separate and express permission to do so from the affected member.

User Information

The EWWP's web server hosted by Carbon60 with domain registered at DomainPeople. may collect the IP address and domain you are using to access its website; the type and version of web browser and operating system you are using; the number, duration, and frequency of visits to our website; and the identities of the websites you came from and visit next. However, this information cannot be traced to individual users as users can visit our website without telling us who they are or revealing any personal information, including their e-mail addresses. Local 213 EWWP may use website visit statistical information to monitor website performance, plan website improvements, and track information in aggregate form. This information is not shared with any other parties.

Member communication/inquiries

During intake phone calls, EWWP employees are always responsible for ensuring the individual they are corresponding with is the correct plan Member. Employees are required to ask two to three specific identifying questions from a caller. Personal information (benefits available, account balances) is not disclosed until the individual's identity is confirmed. In addition, available benefit balances are not disclosed to dental plan offices, only to the plan member.

If incapacitated, a member can authorize another individual to communicate with the EWWP office on their behalf by written or verbal authorization to the Privacy Officer. This authorization will be maintained in the Member's file and adhered to until such time the Member withdraws/rescinds the authorization.

SECURITY

Our members personal information is stored in rooms with restricted access in a secure building or on our fire-walled and password protected, electronic data base. Currently, we permanently retain most of our records and destroy or return certain records to affected Members on an ad hoc basis. We will be reviewing our retention policy and practices with respect to information storage and revising this during 2022.

The EWWP avoids transmitting personal information by e-mail. Currently, the messages sent and received over the Internet are not encrypted.

Our website contains links to third-party websites that are not subject to this Protection of Privacy Policy. The EWWP is not responsible for the privacy practices or policies of these websites. We do not share any of your personal information with these websites, and we encourage you to obtain and read their privacy policies before you do.

The EWWP ensures that its staff know about and understand this Protection of Privacy Policy. Our staff ensure that your personal information is gathered, retained, and used in accordance with the principles and practices set out in this policy and applicable laws.

Employees Working Remotely

Employees who work "on-the-road" or are in a "work-from-home" situation are directly responsible for the personal information in their control while working away from the office. Documents containing personal information are preferably not to be transported out of the EWWP office, unless under exceptional circumstances, as approved by the Privacy Officer. The reason for this is that employees can access EWWP files and the server via a secure VPN connection which eliminates the need for printing of documents when working remotely.

If a document is printed offsite from the secured network, the employee must ensure to destroy any documents, by returning the printed documents to the office and disposing of them in the secure shredding boxes. Documents are not to be disposed of at an off-site area.

ACCESS AND CORRECTION

Currently, Members can only access their own personal information that the EWWP has by visiting our business office at 1424 Broadway Street, Port Coquitlam. However, we encourage you to do so and to correct any errors that might come to your attention thereby or when you receive or fail to receive our communications. You may submit changes or corrections by e-mail at info@213benefits.org. However, for security reasons we encourage you to do so by mail, facsimile, or in-person.

The Privacy Officer will consider requests to expunge personal information from files and will make decisions in this regard based on a determination about whether the information is relevant to the plan. A member can appeal the Privacy Officer's decision in this regard by providing the Electrical Workers' Pension Plan Board of Trustees with a written submission describing the reasons why the member believes the Privacy Officer's decision is incorrect.

PRIVACY BREACH RESPONSE

In the event there is a privacy breach the following steps will be taken, which are detailed more at length in the EWWP's Privacy and Security Incident Response Plan:

Step 1: Contain the Breach

The person/Staff member who has discovered the breach take steps to limit the breach by stopping the breach if it is continuing and try to contain the loss of information. They must then notify the Privacy Officer immediately.

The Privacy Officer will:

- conduct an initial investigation;
- notify the Police if the breach appears to involve criminal activity;
- notify the Trustees and inform other departments (IT, Local 213 Security) and create a team to respond to the breach (The Response Team);
- commence filling out the SP IncidentBreachReport_EWWP.docx along with the person/Staff member's input who discovered the Breach.

Step 2: Evaluate Risks

The Response Team will determine:

- what information is involved
- the cause and extent of the breach
- individuals affected by the breach
- the foreseeable harm from the breach

Step 3: Notification

The Privacy Officer will notify affected individuals through appropriate means in accordance with provincial and federal law. The Privacy officer will determine if notification is required or necessary under the circumstances to:

- Insurers or others through contractual obligations;
- Professional or other regulatory bodies;
- Other internal and/or external parties not already notified;
- The Office of the Privacy Commissioner (Federal);
- The Office of the Information and Privacy Commissioner (Provincial);

Step 4: Complete Investigation

The Privacy Officer will complete the SP IncidentBreachReport_EWWP.docx which will include recommendations to the Trustees and the EWWP for changes to policy, organizational structure, security, and procedures in an effort to prevent future privacy breaches.

POLICY RECORD

Date of Approval: Jan 7, 2022 Board of Trustees' meeting, Amended Dec 6, 2022

Approved by: Scott Ashton (Chair) and Trustees

Next Review Date: January, 2024

Owner: Hileray Kilback, Director Pension and Benefits

Last Review Date: Dec 6, 2022

Responsible Person/Contact: Hileray Kilback, Director Pension and Benefits