

## **Privacy Policy**

An important part of our commitment to providing our plan participants with excellent service is our respect for their right to privacy. As a plan participant, your personal information is only collected, used and disclosed by Manion Wilkins & Associates Ltd. (MWA) in accordance with this Privacy Policy.

### **What is Personal Information?**

Personal information is information that identifies you as an individual. It includes not only your name and address, age and gender, but also your work history, your identification numbers, including your Social Insurance Number (SIN) and the names of your designated beneficiary(ies) and covered dependants (if applicable). Any medical or dental history provided to us in connection with Welfare claims is personal health information, which is also considered personal information, but is treated with extra sensitivity.

Aggregate information that cannot be associated with a specific individual, such as the number of claims made under a given Plan over a fixed period of time, is not personal information.

### **Why Does MWA Ask You For Your Personal Information?**

Your personal information is essential in order to administer your Welfare and Pension benefits. We ask for and use your personal information for the following purposes:

- Arranging for Insurance coverage where applicable.
- Administering your Pension benefits where applicable.
- Verifying your eligibility for benefits.
- Paying claims on behalf of you and your eligible dependants.
- Internal audits of benefits payouts and external audits of our management of trust monies.
- Where applicable, income tax reporting purposes or to comply with other legal requirements.
- Where necessary, preparation of reports used by the Plan Sponsor in the financial management and oversight of the Plan(s).

We may verify some of the information you give us with your employer or your union in order to administer your Welfare and Pension benefits correctly. Depending on the plan, we may also administer payments for industry funds, associations or union dues on behalf of your employer, such that you are personally identified, however, your personal health information is never collected, used or disclosed for such purposes.

### ***Obtaining your Consent before Using your Personal Information***

For plans governed by a Board of Trustees, we obtain your express consent to use your information when you complete a Member Information Card. For all other plans, we obtain your consent on an Application for Benefits, or we rely on your employer to obtain your consent to share information with MWA for the purpose of administering your benefits. We always obtain your express consent when you fill out a claim form. Your consent is implied when we can reasonably conclude that you've given consent by some action, or that you would consent if directly asked. For example, if your plan offers a pay-direct drug card and if you use the drug card, we can conclude that you have given us your consent to release personal information about your eligibility for benefits to our pharmacy benefit manager and your pharmacist.

If you do not consent to certain uses of information, or if you withdraw your consent after it has been given, we may not be able to provide you with a particular benefit or service. If so, we will explain the situation to you and let you know what your options are.

### **Use of Your SIN**

We ask for your SIN for:

1. Income tax reporting purposes to comply with the requirements under the federal Income Tax Act and the Quebec Act respecting the Ministère du Revenu (if applicable).
2. Administrative purposes to ensure:
  - An accurate match between personal information collected from you and the information reported by contributing employers if the employer reports information to MWA using your SIN; and
  - You are accurately and uniquely identified internally on our system. Plans are currently underway to convert our system such that your SIN is no longer used as a primary identifier.

If we don't need your SIN for income tax reporting purposes, you may choose not to give it to us. In that case, another identification number will be assigned to you with no impact on the services you receive.

### ***Disclosure of your Personal Information***

Your personal information is shared with the following parties only to the extent required to administer your benefits: your Plan Sponsor, your union (if applicable), the coverage

provider(s) and the financial institution(s) involved in caring for the Plan. In the case of a claim for Welfare benefits, we may also share information, but only as necessary, with your hospital, doctor, dentist or other professionals to protect ourselves and coverage providers against fraud, and in order to properly assess your claim. We obtain your authorization on claim forms to such limited release of personal health information.

MWA will release your personal information when we believe such release is appropriate in order to comply with the law, for example, if we receive a subpoena or court order.

Only authorized persons have access to your file as required for coverage or claim purposes. The information in your file is not shared with anyone other than yourself, unless you authorize us to release it to them.

### **Retention of your Personal Information**

MWA is in the process of developing guidelines and implementing procedures with respect to the retention of personal information both on and off-site. Personal information that has been used to make a decision about a plan participant shall be retained long enough to allow the individual access to the information after the decision has been made. MWA is subject to specific legal requirements with respect to retention periods as well, for example, as outlined in income tax and pension legislation.

MWA makes every effort to securely destroy or make anonymous personal information that is no longer required to fulfill identified purposes.

### ***We Keep your Personal Information Secure***

Our computer systems are designed to ensure that your information, when stored electronically, is secure from unauthorized access or misuse. We have strict safeguards in place to ensure that your personal information, in both paper and electronic form, is only accessed internally by those who need it to service our Plan members.

All of our employees, agents and representatives are aware of the sensitive nature of the information we hold and have agreed in writing to keep personal information in their possession strictly confidential. Information is only retained for as long as it is necessary or as long as we are legally required to retain it. It is securely destroyed or anonymized thereafter.

### ***You Can See and Verify the Accuracy of Your Information***

You have the right to access the information in your file and to verify, update and correct it. There is no charge for verifying or correcting your information, however, if you want a copy of all of your records, there may be a charge to cover our costs. We will let you

know in advance if there is a charge to provide you with this information. All access requests must be in writing and will be dealt with in a timely manner.

If we have obtained information about you from other people, we will let you know who we got it from upon your request. For example, we may obtain your initiation date from your local union office. We also obtain confirmation that you worked for a particular employer from the employer's contribution remittance forms.

### ***Our Privacy Commitment to You***

**As your Plan Administrator, we take our commitment to protecting your privacy seriously. We do everything we can to keep your information secure from unauthorized access or misuse. If you have any questions or concerns about this policy or feel that we are not living up to the commitment we are making to you, please contact us as follows:**

Privacy Officer,  
Manion, Wilkins and Associates Ltd.  
500-21 Four Seasons Place  
Etobicoke, ON M9B 0A5  
Tel: Call Centre (416) 234-3511 → Hours: 7:30 am to 7:30 pm (5:00 on Fridays)  
Toll Free: Switchboard 1-800-263-5621  
Fax: (416) 234-9147  
E-mail: [privacyofficer@manionwilkins.com](mailto:privacyofficer@manionwilkins.com)

Our goal is to resolve any privacy issue you may have in a timely manner to your satisfaction.

By providing you with this Privacy Policy, Manion Wilkins & Associates Ltd. is pledging its continued commitment to protecting the information we collect. We regularly review our information-handling practices to ensure that we are abiding by this policy.