



Personal Information Policy

Board Policy



SHEPP
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Personal Information Policy

Version 1.5

May 2025

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This document is being provided for information only, and does not replace the terms of the Trust Agreement or the Plan. While every effort has been made to ensure the contents are accurate, the terms of the Trust Agreement and the Plan will prevail if this document conflicts with any of the provisions of the Trust Agreement or the Plan provisions.

The Plan is registered with the Pensions Division of the Financial and Consumer Affairs Authority of Saskatchewan and with the Canada Revenue Agency. The registration number is 0304667.

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Summary

The Personal Information Policy (Policy) sets out the principles and responsibilities of the Board of Trustees (Board) of the Saskatchewan Healthcare Employees' Pension Plan (Plan) as it relates to the collection, use and disclosure of personal information.

The Board has adopted industry best practices with respect to effective pension plan governance. A key aspect of effective pension plan governance is to identify principles and procedures around safeguarding the personal information of Plan members.

1 Statement of Principles and Purpose

- 1.1 Administering the Plan requires that SHEPP collect, use, and disclose personal information about members and their beneficiaries. This Policy is designed to explain how SHEPP collects, uses, and discloses personal information, and the steps SHEPP takes to protect personal information. It is based on the *Personal Information Protection and Electronic Documents Act* as well as the Canadian Standard Association's Model Code for the Protection of Personal Information. SHEPP's Privacy Officer (PO) oversees this Policy as well as other SHEPP policies that relate to personal information protection.
- 1.2 This Policy explains:
 - a) Why and how SHEPP collects, uses, and discloses personal information;
 - b) The principles of personal information protection to which SHEPP adheres;
 - c) How an individual may make inquiries about their personal information; and
 - d) How an individual may inquire about SHEPP's collection, use and disclosure of personal information.

2 Scope and Application

- 2.1 This Policy applies to "personal information", meaning information about an identifiable individual. This Policy does not apply to information that does not identify an individual, such as statistical information or information in the aggregate.
- 2.2 In no event shall the terms of this Policy affect or alter the interpretation of the Trust Agreement or the Plan. If there is a conflict between this Policy and the terms of the Plan, the terms of the Plan will prevail. SHEPP may amend this Policy from time to time, in its sole discretion.

3 Policy Guidelines

- 3.1 Use of Personal Information
 - 3.1.1 To administer the Plan, SHEPP needs to collect, use, and disclose various types of personal information. For example, SHEPP needs personal information in order to:



- a) Determine an individual's eligibility for membership in the Plan;
- b) Calculate and pay a benefit from the Plan in the event of a Plan member's retirement, death, termination, spousal relationship breakdown or similar event;
- c) Determine to whom a benefit is payable after a member's death;
- d) Calculate the amount required to credit a member or prospective member with service under a portability transfer agreement;
- e) Perform an actuarial valuation of the Plan;
- f) Fulfill tax and/or regulatory reporting requirements; and
- g) Perform any special study or calculation that may be required by the Board or regulatory authority.

3.2 Collection of Personal Information

3.2.1 How SHEPP collects the information it uses depends on the nature of the information being collected. Most of the personal information SHEPP uses is obtained directly from participating employers, though sometimes it is obtained from individual Plan members. What follows is a list of the more common types of personal information that SHEPP uses, along with an explanation of how SHEPP obtains the information:

- a) All Plan members understand that participation in SHEPP is a condition of their employment. When a new employee is hired, the participating employer provides SHEPP with the enrolment information electronically via data feed from 3sHealth. SHEPP then confirms the enrolment by sending a letter to the new employee advising them that their personal information will be collected, used, and disclosed by SHEPP during their membership in SHEPP. Included in this letter is the username and password for the member to access and verify their Plan information via SHEPPweb, the Plan's secure member portal.
- b) Plan members provide beneficiary designation information to SHEPP directly using SHEPP's designation of beneficiary form or online through SHEPPweb.
- c) At enrolment and when the participating employer becomes aware of a change in their employee's information that is relevant to SHEPP (such as a change in name, marital status, or earnings), the employer will update SHEPP's information. SHEPP sends regular communications to Plan members including members' annual statements that allow Plan members to review and verify the updated information.
- d) Payroll information about Plan members is obtained from the member's employer.
- e) Updates from Plan members who have a deferred pension, who have terminated and whose entitlements are subject to a transfer deficiency holdback or who are receiving a pension from the Plan are provided directly by the individual to SHEPP.
- f) SHEPP maintains information about the spouses of the Plan members, which is obtained from the member.

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3.3 Accountability

3.3.1 SHEPP has appointed a Privacy Officer to oversee its collection, use and disclosure of personal information. Inquiries about this Policy and about SHEPP's use, collection and disclosure of personal information can be directed to:

Samer Baghdadi, Privacy Officer
102 - 4581 Parliament Avenue
Regina, SK S4W 0G3
PH: 306.751.8300 (in Regina)
1.866.394.4440 (Toll-Free)

3.4 Protection of Personal Information

3.4.1 SHEPP takes seriously its obligation to protect the personal information it collects and uses, and it has adopted a variety of security measures to protect that information:

- a) SHEPP requires its employees to adhere to an internal set of policies and procedures that help ensure SHEPP employees maintain the protection of personal information in SHEPP's possession. For example, on an annual basis, employees are required to read the "Code of Conduct & Conflict of Interest Statement and the Confidentiality & Privacy and Protection of Personal Information Policy Statement" and acknowledge they have done so.
- b) Most of the personal information used by SHEPP is stored in the pension administration system. Only authorized users are granted access to this system, and several security controls are in place to help prevent unauthorized access.
- c) SHEPPweb, is the secure online portal that is available to SHEPP employees, participating employers, active Plan members, and Partner Committees. Only authorized users are granted access to this system, and several security controls are in place to help prevent unauthorized access. Access is restricted to the information to which the user has permissions to access. Member access is limited to their own personal information.
- d) SHEPP maintains minimal paper files. Access to those files is limited and SHEPP has procedures in place to protect their security.
- e) SHEPP maintains secure premises with access limited to SHEPP employees and others who have a need to access the offices. SHEPP has a secure, dedicated server room with strictly controlled access.
- f) Personal information is retained for as long as is necessary to fulfill the purposes for which it was collected which may include confirming the nature of payments made to Plan members.
- g) When personal information is destroyed, SHEPP takes special precautions to ensure that it is destroyed in a secure manner.

3.5 Inquiries About Personal Information

3.5.1 Requests for Disclosure of Member's Personal Information:

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- a) If a member requests access to their personal information in SHEPP's possession, the individual will be asked to complete the Request for Access to Personal Information form, following a conversation with SHEPP's Privacy Officer and a Pension Officer.

3.5.2 Inquiries from Third Parties

- a) Unless otherwise permitted by the privacy legislation, SHEPP will not provide personal information to a third party without the written consent of the individual to whom the information relates in a form that is acceptable to the Privacy Officer.
- b) If a member experiences a spousal relationship breakdown, the member's spouse has rights to access information about the member's pension that are set out in the governing pension statute.

3.5.3 Confirmation and Correction of Personal Information

- a) If an individual is concerned that the personal information that SHEPP has is incorrect, they may seek a correction. For example, an individual can verify the date of birth SHEPP has in its records. If the date of birth in SHEPP's records is incorrect the individual can request a correction. SHEPP may make the correction if appropriate.
- b) The individual may also ask how their personal information has been used and if it has been disclosed.
- c) These requests can be made by contacting SHEPP Administration at the following:

| Contact | Details |
|-----------|---|
| Telephone | 306.751.8300 (in Regina) 1.866.394.4440 (Toll Free) |
| Fax | 306.751.8301 |
| E-mail | sheppinfo@shepp.ca |
| Mail | SHEPP 102 - 4581 Parliament Avenue Regina, SK S4W 0G3 |
| Website | www.shepp.ca |

3.6 Concerns About SHEPP's Use of Personal Information

- 3.6.1 While SHEPP takes precautions to protect against any unauthorized access to or disclosure of personal information, such unanticipated instances may occur. SHEPP will prioritize the protection of affected individuals but will also determine whether to advise affected individuals once the nature and scope of the access or disclosure is understood.
- 3.6.2 If an individual has a concern about SHEPP's collection, use or disclosure of their personal information, they may contact SHEPP's Privacy Officer to discuss the concern. The Privacy Officer will provide a formal response to any expressed concern within 30 days of receiving notice of the concern. If the Privacy Officer does not address the concern to the satisfaction of the individual, the individual may request that SHEPP's Chief Executive Officer review the matter.



4 Related Documents

- *Personal Information Protection and Electronic Documents Act*;
- Canadian Standard Association's Model Code for the Protection of Personal Information;
- SHEPP's Member Records Retention Policy;
- SHEPP's Privacy and Protection of Personal Information Policy Statement;
- SHEPP's Personal Information Internal Procedures and Guidelines; and
- Board's Governance Review Schedule and Checklist.

5 Policy Review and Amendment

The Board is responsible for the establishment of this Policy and has sole authority to amend it.

Administration will review this Policy as required and provide recommended changes to the Board for its review and approval. The Board will confirm or amend this Policy as required and as set out in the Governance Review Policy and Board Governance Review Schedule & Checklist.

6 Policy Updates

- Policy Approved: September 2010
- Policy Amended: December 2014
- Policy Amended: September 2017
- Policy Amended: May 2020
- Policy Amended: May 2022
- Policy Amended: May 2025

Authorization

Authorized by the SHEPP Board of Trustees:

Date: May 21, 2025

Andrew Huculak
Chair

Jeff Stepan
Vice Chair