

ELECTRICAL INDUSTRY PENSION TRUST FUND OF ALBERTA

PRIVACY CODE

(Effective: January 1, 2004; Updated: October 14, 2025)

A. Policy Statement

The Board of Trustees (the “**Board**”) of the Electrical Industry Pension Trust Fund of Alberta (“**EIPTFA**”) is committed to protecting all of the personal information we have by administering the EIPTFA. Our ongoing commitment to protect such personal information in compliance with the *Personal Information Protection Act* (Alberta) (“**PIPA**”) is addressed in this Privacy Code (the “**Code**”). We want you to know in plain terms why we require personal information, how we use personal information, why we may disclose or exchange personal information and how we protect personal information. Finally, we want you to know how you can inquire about your personal information.

B. Definition of Personal Information

The term “*Personal Information*” means information about an identifiable individual. It includes any information that you provide to us or that we collect from other sources. Examples of Personal Information include your name, address, date of birth, gender, personal records, dependant/spouse/beneficiary information, identification numbers including your social insurance number, employment and earnings information and records, and any other information necessary to administer the EIPTFA.

C. Collection of Personal Information

The Board will collect Personal Information for the purposes set out below. Personal Information may be collected directly from the member or from others including:

- the member’s employer(s);
- the member’s bargaining association;
- spouses, former spouses, beneficiaries and dependents of the member;
- family members of the member;
- authorized representatives or agents of the member; or
- governmental or regulatory authorities.

D. Why We Collect Personal Information

We collect Personal Information in order to properly administer the EIPTFA and for other related purposes. For example, we collect Personal Information:

- to determine your eligibility for pension benefits under the EIPTFA;
- to set up and administer the various benefits to which you or your beneficiaries may be entitled;
- to determine the amount of any benefits payable;
- to recover amounts owing to EIPTFA in the event of an overpayment;
- to reconcile records with a member’s union or employer;
- to comply with various laws and regulations; or
- to verify your identity and protect against potential fraud.

While you may choose to withhold Personal Information from EIPTFA, doing so may affect your entitlement to benefits or services through EIPTFA.

E. Disclosure of Personal Information

The Board will disclose Personal Information to third parties in order to properly administer the EIPTFA and for other related purposes. For example, Personal Information may be exchanged with:

- the Board's agents and delegates, including Employee Benefit Funds Administration Ltd. to administer the EIPTFA;
- the Board's service providers, including actuaries, investment managers and consultants, and legal counsel;
- a member's union to verify records and reconcile information that the union has in relation to a member;
- a member's employer(s) to ensure that members accrue the benefits they are entitled to under the EIPTFA and to reconcile information that an employer has in relation to a member;
- the Board of Trustees of the Electrical Industry Insurance Benefit Trust Fund of Alberta and the Board of Trustees of the Electrical Industry Education Trust Fund of Alberta to reconcile and verify information; and
- any other person or entity in order to achieve the purposes set out in Section D of this Privacy Code.

PIPA authorizes other disclosures of Personal Information including, for example, where the disclosure is in the interests of the individual and their consent cannot be obtained in a timely way and where the disclosure is to a public body authorized to collect such Personal Information. If we disclose Personal Information for any of these reasons, we keep a record of what, when, why and to whom such information was disclosed. We do not keep a record when your Personal Information is disclosed to third parties for routine purposes such as reporting to Canada Revenue Agency for income tax purposes.

F. Safeguarding Information and Keeping Your Personal Information Confidential

The Board and those authorized to act for the Board are responsible for maintaining reasonable security arrangements against the risk of unauthorized access, collection, use, disclosure or destruction of Personal Information. The Board keeps its agents and delegates informed about policies and procedures for protecting Personal Information and reinforces the importance of complying with them. All agents and delegates of the Board are required to conform to these policies and procedures. The Board also has strict procedures in place for destroying, deleting or disposing of Personal Information when it is no longer required for the purposes set out in this Code or by law.

G. Retention

We only keep your Personal Information for as long as we need it to meet the purposes set out in this Code and PIPA. The length of time we retain your Personal Information depends on various factors, including the type of benefit or pension you have with us and any legal or regulatory requirements we have to meet.

H. Accuracy of Information

The Board is committed to maintaining the accuracy of all Personal Information for as long as it is being used for the purposes set out in this Code and provided you keep us up to date. We rely on you to provide accurate Personal Information and to notify us promptly of any changes (such as changes to your address, contact number and updates to your beneficiaries) to ensure that your benefit entitlements are administered appropriately.

I. Personal Information Requests

Under PIPA, you have a right to request:

- access to your Personal Information;
- a correction to the Personal Information; and
- information about how your Personal Information has been used or disclosed by us.

To make a request about your Personal Information, please contact the Board's Privacy Officer in writing at the information set out below. The Privacy Officer will respond to your request within 45 days. The Board will need specific information from you to enable us to search for and provide you with the Personal Information we hold about you. The Board may charge you a nominal fee to do this; however, we will advise you of the fee in advance.

There are a few instances when the Board will not be able to provide some of the Personal Information we hold about you. These include but are not limited to:

- if it contains the Personal Information of other persons;
- if it is subject to solicitor-client or litigation privilege;
- if it contains the Board's proprietary information that is confidential to us;
- if it has already been destroyed due to legal requirements or because we no longer needed it for the purposes set out in this Code; or
- if it otherwise cannot be disclosed for legal reasons.

If we are unable to provide you with access to your Personal Information, we will always explain the reason why.

J. Privacy Officer

The Board has a Privacy Officer to oversee matters relating to privacy in respect of the Electrical Industry Pension Trust Fund of Alberta. The contact information for the Privacy Officer is below:

By mail:

Privacy Officer, EIPTFA
c/o EBFA
4211 – 95th Street NW
Edmonton, Alberta, T6E 5R6

By email:

privacy.officer@ebfa.ca