

OMERS Members Privacy Statement

PRIVACY



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Effective
February 1, 2026

OUR COMMITMENT TO YOUR PRIVACY

At OMERS, honesty and integrity are at the core of everything we do. We are committed to building and maintaining trust in all aspects of our operations, including the handling of your personal data. Across our pension operations, OMERS applies established privacy practices designed to keep personal data safe, secure and used appropriately. This Privacy Statement outlines OMERS approach to privacy and individual rights regarding personal data.

This Privacy Statement explains how we collect, use, store, and share personal data in connection with our pension operations.

This Privacy Statement applies to personal data we collect about individuals who are, or may become, eligible for benefits under the OMERS Pension Plans (“Plans”). This includes members of the Plans, their spouses, children, and any designated beneficiaries. For simplicity, throughout this Statement we refer to these individuals collectively as “Members and Survivors.”

We also collect personal data through our general corporate operations and online services, including MyOMERS. This information is governed by the OMERS Operations Privacy Statement. Personal data of OMERS employees, prospective employees or Designated Contractors is governed by OMERS Employee Privacy Statement. We also have a separate Privacy Statement for our Investments operations.

What type of personal data do we collect?

In the course of administering the Plans, OMERS collects different types of personal data depending on how someone interacts with us. Examples of the categories of data we may collect to provide pension services include:

- **Basic contact information:** home address, email, phone number;
- **Personal details:** date of birth, age, gender, marital status, death notices;
- **Work information:** job history, earnings;
- **Government ID:** Social Insurance Number;
- **Banking information:** account details for payments;

- **Legal information:** power of attorney documents;
- **Health information:** medical details needed for benefits;
- **Union or association membership;**
- **Communication records:** emails, letters, call recordings, and metadata;
- **Survey responses:** answers to feedback or research surveys; and
- **Other information:** anything shared with us by or in respect of the individual.

OMERS strives to keep personal data accurate, complete and up to date. We may use third-party sources to verify or supplement the information we hold.

How do we use personal data?

OMERS uses personal data to administer the Plans, deliver pension services and improve our operations. We may use personal data to:

- Establish and maintain Plan membership and records;
- Administer pension benefits, including processing changes in status (e.g., disability entitlement) and pay benefits to Members and Survivors;
- Provide education and information about the Plan and retirement;
- Communicate with participating employers;
- Locate Members and Survivors;
- Project future cash flow requirements for Plans;
- Fulfill legal and regulatory obligations related to pension administration;
- Research, develop, and improve our services, including identifying trends and insights to support Plan decisions;
- Record and evaluate contact centre interactions for training, quality assurance, and service improvement;
- Analyze feedback from surveys, focus groups, or interviews to tailor communications and improve operations; and
- Carry out any other purpose to which an individual has consented.

How do we collect personal data?

OMERS collects personal data in several ways, depending on how individuals interact with us. We may collect personal data through:

- Updates from employers throughout the employment relationship, including when an individual becomes eligible or joins the Plan;
- Forms, requests for information, and surveys;

- Focus groups and interviews;
- Calls to our contact centre;
- Information entered into MyOMERS; and
- Third-party sources such as participating employers, unions or associations, the Public Guardian and Trustee, the Canada Revenue Agency, and other pension plans (e.g., for plan transfers or service buy-backs).

If you provide OMERS with personal data about another individual, you must have the necessary authority or consent to allow us to collect, use and disclose that information.

Members should use their myOMERS account or call OMERS Member Experience to update their information.

Is personal data shared with third parties?

OMERS may share personal data with affiliates, subsidiaries, and service providers who support our operations. The third parties we work with help us deliver pension services, manage relationships, and meet legal and regulatory obligations. Personal data may be shared with:

- Participating employers;
- Professional service advisors such as actuarial advisers, lawyers, auditors, and consultants;
- Financial service providers (e.g., banks, payroll processors);
- Medical advisors retained by OMERS;
- Relevant parties as provided for in the OMERS dispute resolution process;
- Locator firms;
- Debt collection agencies;
- Other pension plans with which the individual has a relationship;
- Government regulators and agencies, such as the Financial Services Regulatory Authority of Ontario and the Canada Revenue Agency, as well as law enforcement, when required or permitted by law;
- Information technology service providers;
- Engagement and marketing service providers such as online analytics service providers; and
- Mailing and survey services.

De-identified and Anonymized Data

We, or our service providers, may de-identify personal data by removing identifiers or aggregating it with other data. De-identified data may be used for internal

business purposes. We may also anonymize personal data so that it can no longer be used to identify an individual. Anonymized data may be used for any purpose, including sharing with third parties.

Disclosure of Information to Employers for Other Purposes

Participating employers in the Plans may need pension-related details to support workforce and succession planning, or to administer other benefit programs such as long-term disability or insurance. In addition to sharing data for pension administration, OMERS may share the following information with participating employers: a Member's current address, hire and enrolment dates, total accrued service, unreduced early retirement date, pension amounts (including disability pensions), and living or deceased status. Members who prefer not to share this information with their employer may opt out through myOMERS.

Do we use artificial intelligence and machine learning tools?

OMERS and our service providers may use artificial intelligence and machine learning tools to process personal data, including to train and improve these technologies. These tools support internal business activities such as automating tasks, analyzing data, developing and improving services, detecting fraud, and protecting systems. OMERS is committed to using personal data responsibly and has internal processes to assess and oversee the use of these tools. This includes reviewing their purpose, the type of personal data used, the potential impact on individuals' rights and freedoms, the risk of bias, and the extent of human oversight.

How to keep personal data safe?

Users of our online services have a shared responsibility to keep personal data secure. Please take the following steps to help secure personal data when you use computers and mobile devices to access our services:

- Login to myOMERS and to send a secure message and upload documents;
- Install the latest security updates and anti-virus software to help prevent malware and viruses;
- Use the latest version of browsers;
- Use complex passwords to lock devices and mobile applications. Complex passwords include capital letters, numbers and special symbols; and
- Do not use the same password for multiple sites.

Members should use their myOMERS account or call OMERS Member Experience to update their information. Members should keep their OMERS Member ID and myOMERS password confidential. Do not share them with others, including family members.

Where is personal data stored?

We, our service providers and agents may transfer, store or access personal data outside of the jurisdiction in which it was previously collected, used or disclosed. For example, personal data collected in Ontario may be transferred outside of Ontario and/or Canada. When such a transfer takes place, personal data may be

subject to the laws of those other jurisdictions, and in certain circumstances the courts, law enforcement agencies, regulatory agencies or security authorities in those other jurisdictions may be entitled to access that personal data.

How can individuals access or correct their personal data?

Members and Survivors can make access requests through Secure Communications in myOMERS or alternatively, send a request in writing with signature by mail to: OMERS AC 100 Adelaide St. W, Toronto, ON M5H 4H1.

OMERS reviews and processes access requests in accordance with applicable law. Please note that OMERS is not subject to all privacy laws, and in some cases, access may be restricted or declined.

How long do we keep personal data?

We retain personal data for only as long as it is needed to fulfill the identified purposes or as may be required to comply with applicable laws. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Personal data related to pension entitlements and payments may be permanently retained for our mutual protection and to fulfill our legal obligations.

How we update this Privacy Statement

As the law develops and as we evolve our operations, the way in which we collect, use, store, and disclose personal data may change. When this happens, we will update our Privacy Statement to reflect the changes. You can review our updated Privacy Statement at any time by visiting our website, <http://www.omers.com>, or by requesting a copy from our Privacy Office.

Who can I contact with questions or concerns?

If you have any comments or questions about our Privacy Statement, or if you believe that we have not complied with our Privacy Statement, please contact our Privacy Office as follows:

Privacy Office
900-100 Adelaide Street West
Toronto, ON M5H 0E2
Email: privacy@omers.com