

OMERS Members Privacy Statement



Effective
January 1, 2024

OUR COMMITMENT TO YOUR PRIVACY

At OMERS honesty and integrity are at the core of everything we do. We are committed to building and keeping your trust in all aspects of our operations, including how we handle your personal data. Throughout our operations we apply privacy best practices and high standards to ensure that your personal data is safe, secure and used appropriately. This Privacy Statement is designed to help you to understand our approach to privacy.

This Privacy Statement applies to the collection, use, storage, and disclosure of OMERS Members' personal data. Personal data of OMERS Employees, prospective Employees or Contractors is governed by OMERS Employee Privacy Statement.

WHAT TYPE OF PERSONAL DATA DO WE COLLECT?

In the course of our pension operations, OMERS collects a wide range of personal data about you and your beneficiaries. Examples of personal data that OMERS collects includes:

- Basic contact information such as home address, email and phone number
- Date of birth and age
- Gender
- Employment history and earnings
- Social Insurance Number
- Banking information
- Marital status
- Power of attorney
- Health related information
- Union or association affiliation
- Interactions with our contact centre
- Any other information you or related parties provide to us

When you use our websites and online services, such as myOMERS, we and our service providers automatically collect information such as the type of web browser you use; the type of device you use; your operating system and version; your IP address; your location; the pages or features you view or use; referring and exit pages; the date and time of your visit; the number of clicks to, from, within the website; the duration of your visits; detailed data about your interaction with the application; and any other information that may be passed by default from your browser to us in the normal course.

HOW DO WE USE YOUR PERSONAL DATA?

We use personal data about you, your beneficiaries, survivors and any other related parties for the purpose of administering the OMERS Pension Plan, for your individual member purposes and for broader Plan purposes. Some examples of how we use personal data include:

- Establishing and maintaining your OMERS membership
- Administering your pension benefit, including processing changes in your status, such as entitlement to disability benefits
- Paying your pensions and other benefits to you, your spouse, survivors, and others
- Providing you with education and information about the Plan and your retirement
- Communicating with your employer(s)
- Researching, developing, managing, protecting, and improving our services, including identifying trends and insights to make Plan decisions
- Recording and evaluating our interactions with you to assess your satisfaction and for training and quality assurance purposes
- Conducting and recording feedback collected from surveys, focus groups or interviews and analyzing responses to provide us with insights on our operations
- Tracking website usage, transaction history and patterns, for the purposes of improving our website and/or providing tailored messages
- Investigating and resolving technical bugs in our applications
- Improving the user experience of our membership as a whole
- Investigating specific transactions or patterns of transactions to detect unauthorized or illegal activities
- Maintaining appropriate records, including your contact information
- Facilitating the safety and security of visitors to our offices and our employees through the use of CCVS cameras
- Projecting the Plan's future cash flow requirements
- Performing functions required or authorized by law, including meeting our statutory obligations
- For any other purpose to which you consent

HOW DO WE COLLECT YOUR PERSONAL DATA?

The personal data that we use primarily comes from you and your employer. You provide us with your personal data when you complete forms, respond to our requests for information or participate in our surveys or focus groups. You also provide us with personal data when you call our contact center or enter your personal data on OMERS websites. OMERS websites also automatically collect usage and technical information about your visit.

If you provide us with personal data about another person such as your beneficiary, you are deemed to have all necessary authority and/or have obtained all necessary consents from that individual to enable us to collect, use and disclose that personal data.

Your employer provides us with personal data about you when you are eligible to become a member or when you first become a member and throughout your employment relationship. We may also collect personal data about you from third party sources such as your union, the Public Guardian and Trustee and the Canada Revenue Agency.

We may also collect information about you from third parties in order to maintain your membership record, such as updating your contact information or your membership status.

DO WE USE ARTIFICIAL INTELLIGENCE AND MACHINE LEARNING TOOLS?

OMERS and our service providers may incorporate artificial intelligence and machine learning tools to process your personal information, including using it to train and refine algorithms and algorithm-based systems. These tools help us, and our service providers, in internal business activities, such as automating tasks, evaluating data, developing new products and services, securing business systems, and other business purposes. OMERS is committed to the ethical use of your personal data and has developed processes and oversight for the development and use of these tools. This may require that OMERS evaluate an artificial intelligence or machine learning tool for its appropriateness, the sensitivity of the personal information processed, the impact on the rights and freedoms of individuals, and the potential for bias in the tools if they are being used to assist in decision-making.

IS YOUR PERSONAL DATA SHARED WITH THIRD PARTIES?

We may share your personal data with our affiliates, subsidiaries and service providers who assist us with our business operations.

Below are some examples of third parties with whom we share your personal data:

- Actuarial advisers
- Debt collection agencies
- Engagement and marketing service providers such as online analytics service providers
- Financial service providers such as banks and payroll providers
- Information technology service providers such as cloud hosting or software services
- Locator firms
- Mailing services
- Medical advisors retained by OMERS
- Other pension plans with which you have a relationship
- Your employer(s)
- Professional service advisors such as lawyers, auditors or consultants
- Survey services/Research firms
- Other government agencies in accordance with their statutory authority
- Regulators such as the Financial Services Regulatory Authority of Ontario and Canada Revenue Agency

We or our service providers may de-identify personal data by aggregating information about you with other plan members, beneficiaries, survivors or others or by removing identifiers. This de-identified information may be used by us or our services providers for internal business purposes. In addition, we or our service providers may also anonymize personal data so that it can no longer be used to identify you. This anonymized data may be used for any purpose including sharing this information with third parties.

DISCLOSURE OF INFORMATION TO EMPLOYERS FOR OTHER PURPOSES:

The OMERS Pension Plans form part of your overall employment relationship with your employer. Unlike most private sector pension plans, employers who participate in the OMERS Pension Plans do not always have information about member pension accruals, or benefit entitlements that they may require for workforce and succession planning purposes, and for the purpose of other employment related benefit plans such as long-term disability plans and insurance plans. As such, in addition to sharing information for the purposes of pension plan administration, we may share information about a member's hire date, enrolment date, total accrued service, unreduced early retirement date, and pension amounts after retirement (including disability pensions), for workforce and succession planning purposes and for the purposes of administering other employer benefit programs in which you are enrolled. Members who prefer that this information not be shared may "opt out" on myOMERS.

WHAT ABOUT COOKIES?

When you visit our websites, we place files called “cookies” on your internet browser. These files ensure our websites function correctly during your visit and can also help our site remember any preferences you’ve set to assist you during future visits. Cookies used on OMERS websites also help us understand how our websites are performing by measuring visitor traffic.

OMERS provides website visitors with notice and choice over the cookies that are placed on their browsers. Upon your first visit to an OMERS website you will be presented a banner that will allow you to set your cookies preferences. The banner also provides you with more information on the specific cookies in use on our sites which can be reviewed prior to setting your preferences. You may update your preferences at any time by navigating to the bottom of an OMERS web page and selecting the “Cookie Preferences” option.

Our website often provides links to websites that are operated by third parties not under our control. This Privacy Statement does not describe the privacy policies of any third-party websites or their privacy practices. We are not responsible for how such third parties collect, use, or disclose your personal data, so it is important to familiarize yourself with their privacy policies before providing them with your personal data.

HOW IS YOUR PERSONAL DATA KEPT SAFE?

Whether in electronic or paper-based format, we implement technical and organizational measures to ensure an appropriate level of security, keeping in mind the nature, scope, context and purpose of processing, cost, and the potential risk to you. We use appropriate technology and efforts designed to safeguard your personal data from loss, theft, and unauthorized access, use or disclosure. We require our service providers and agents to protect personal data processed on our behalf.

HOW CAN YOU HELP TO KEEP YOUR PERSONAL DATA SAFE?

You have a shared responsibility to keep your personal data secure. Please take the following steps to help secure your personal data when you use your computers and mobile devices:

- Use your myOMERS account or call OMERS Member Experience to update your information
- Use your myOMERS secure communication to submit documents and communicate securely with OMERS
- Keep your OMERS Member ID and myOMERS password confidential. Do not share them with others, including family members.
- Install the latest security updates and anti-virus software on your device to help prevent malware and viruses
- Use the latest version of browsers
- Use complex passwords to lock your device and mobile applications. Complex passwords include capital letters, numbers and special symbols
- Do not use the same password for multiple sites

WHERE IS YOUR PERSONAL DATA STORED?

We and our service providers and agents may transfer, store or access your personal data outside of the jurisdiction in which it was previously been 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 your personal data.

HOW CAN YOU ACCESS OR CORRECT YOUR PERSONAL DATA?

You may request access to your personal data through myOMERS or by contacting our Member Experience team. Upon verification of your identity, we will provide you with access to your personal data, subject to applicable legal restrictions.

We try to ensure that the personal data we collect about you is accurate, complete and up-to-date. However, we rely on you and your employer to provide accurate information in the first instance, and to notify us when there is a change in your personal data. In certain circumstances we may verify personal data or obtain additional personal data through third parties.

HOW LONG DO WE KEEP YOUR 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 your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Given the nature of the OMERS Pension Plans, your personal data is typically retained until the end of our obligation to you or your survivors, plus a fixed period of time thereafter.

HOW DO WE UPDATE THIS PRIVACY STATEMENT?

As the law develops and as we evolve, 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 Head of Privacy.

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 Head of Privacy as follows:

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