

# OMERS Operations Privacy Statement

## PRIVACY



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### 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 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 corporate operations and online services.

This Privacy Statement applies to:

- Personal data we collect about employer representatives, union or association officials, service providers, and others we interact with in the course of our operations. For simplicity, we refer to these individuals as “Operational Contacts”.
- Personal data we collect through the use of our websites and portals, including MyOMERS. For simplicity, we refer to these as our “Online Services”.

Personal data that we collect about Plan members and related individuals as part of our pensions operations is governed by the OMERS Members 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?

OMERS collects different types of personal data for our business operations and online services depending on how someone interacts with us.

For **Operational Contacts**, we may collect:

- **Communication records:** emails, letters, call recordings, and metadata;
- **Professional information:** job title, qualifications, work history, background check results; and

- **Survey responses:** answers to feedback or research surveys.

For our **Online Services**, we automatically collect:

- **Device details:** browser type, device type, operating system and version;
- **Session data:** IP address, location, pages viewed, time spent, clicks, and visit time; and
- **Interaction data:** how you use features, what you click, and other activity details.

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 deliver services and improve our operations. How we use personal data depends on the individual's relationship with OMERS.

For **Operational Contacts**, we may use personal data to:

- Communicate and manage relationships with employer representatives, service providers, union officials, and others;
- Conduct due diligence and risk assessments;
- Evaluate qualifications and suitability of individuals in business relationships with OMERS; and
- Meet legal, regulatory, and contractual obligations related to procurement, compliance, and governance.

For **Online Services**, we may use automatically collected data to:

- Support secure access, including authentication and troubleshooting;
- Track usage patterns to improve functionality and user experience;
- Investigate and resolve technical issues; and
- Detect unauthorized or illegal activity.

## General Uses Across All Our Operations

Depending on the context, we may also use personal data to:

- 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;
- Maintain appropriate records;
- Support the safety and security of visitors and employees, including through CCTV monitoring; 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.

From **Operational Contacts**, we may collect personal data through:

- Onboarding forms and contractual documentation;
- Regulatory filings and publicly available sources; and
- Due diligence processes involving service providers, vendors, and other third parties.

From **Online Services**, we collect personal data automatically through standard browser and device interactions. This includes technical and usage data such as device type, IP address, pages visited and interaction patterns.

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.

## 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 services, manage relationships, and meet legal and regulatory obligations.

Personal data may be shared with:

- Professional service advisors such as lawyers, auditors, and consultants;
- Third-party service providers and consultants performing due diligence or background checks; and
- Other governmental or law enforcement agencies, as permitted by law.

Depending on the context, we may also share personal data with:

- Information technology service providers;
- Engagement and marketing service providers such as online analytics service providers;
- Mailing and survey services; and
- Governmental or law enforcement agencies, as permitted or required by law.

## 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.

### 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.

### What about Cookies?

When visitors use our websites, we place files called "cookies" on their internet browser. These files ensure our websites function correctly during their visit and can also help our site remember any preferences they have set to assist them 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 a first visit to an OMERS website the visitor will be presented with a banner that will allow the visitor to set their cookies preferences. The banner also provides the visitor with more information on the specific cookies in use on our sites, which can be reviewed prior to setting their preferences. Visitors may update their preferences at any time by navigating to the bottom of an OMERS web page and selecting the "Cookie Preferences" option.

Our website may provide 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. Visitors to a third-party site should familiarize themselves with the third-party privacy policies before providing those third parties with your personal data.

### How is personal data kept safe?

Whether in electronic or paper-based format, we implement technical and organizational measures designed to provide an appropriate level of security, keeping in mind the nature, scope, context and purpose of processing, cost, and the potential risk to the personal data. We use appropriate technology and efforts designed to safeguard 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.

### 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?

- **Operational Contacts** should submit access requests through their employer.
- Other individuals may send written requests to the OMERS Privacy Office using the contact details provided below.

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. Business contact, usage data, and personal data collected during due diligence or business engagements is retained as long as necessary to support service delivery, audit and compliance requirements.

## 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](mailto:privacy@omers.com)