

EMPLOYEE BENEFIT FUNDS ADMINISTRATION LTD.

PRIVACY CODE

(Effective: January 1, 2004)

A. Policy Statement

Employee Benefit Funds Administration Ltd. ("EBFA") is committed to protecting and keeping confidential all of the personal information that individuals, including employees and members, share with us. Our ongoing commitment to respect and protect the privacy and confidentiality of all individuals is addressed here in our privacy code. We want you to know in plain terms why we ask for your personal information, how we use your personal information in establishing and maintaining our relationship with you and how we keep your personal information confidential. Finally we want you to know how you can inquire about the personal information we hold about you.

B. Definition of Personal Information

The term "*Personal Information*" refers to information that specifically identifies you as an individual and is provided to or collected by EBFA. It includes any information that you provide to us or that we collect from other sources with your permission. Examples of this information include your name and address, age and gender, personal records, dependant/spouse/beneficiary information, identification numbers including your social insurance number and employment information and records including hours worked.

Sources of information include, among others, information that you provide or that EBFA collects from you and information collected and/or provided by participating employers. At times we may require your personal information from healthcare providers and various other institutions such as insurance companies.

C. Why We Ask for Your Personal Information

We require your personal information for the purposes of administering and providing plan benefits to members and their spouses/dependants or beneficiaries from the pension and benefits plans described in Part I below. The better we know you, the better we are able to administer the plans and benefits under those plans. We therefore ask for your personal information for the following purposes:

- to determine your eligibility for certain benefits and pensions
- to set up and administer various plan benefits to which you may be entitled
- to comply with various laws and regulations
- to verify your identity and protect against any potential fraud

In general, you can choose not to provide us with some or all of your personal information. However, please understand that if you make this choice, we may not be able to provide you with various benefits, including pension benefits, for which you may be eligible.

D. Accessing Your Personal Information

If you want to review or verify your personal information, or find out to whom we have disclosed it as permitted by this Code, you can contact our Privacy Officer. EBFA will need specific information from you to enable us to search for and provide you with the personal information we hold about you. EBFA 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 EBFA 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 references to other persons
- if it is subject to solicitor/client or litigation privilege
- if it contains our own 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
- if it 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.

E. Accuracy of Information

EBFA is committed to maintaining the accuracy of all personal information for so long as it is being used for the purposes set out in this Code and provided you keep us up to date. Prompt notification of any changes, such as your address or contact number, will greatly assist us in ensuring the accuracy of your information. Should you discover, upon review of your personal information, that amendments are required, please advise us and we will make our best efforts to advise others of any important amendment to your personal information that we may have released to them. If we do not agree to make the amendments that you request, you may challenge our decision. We will make a record of this challenge and, if necessary, disclose the challenge to third parties who also possess that personal information.

F. Release of Personal Information

EBFA has a strict policy of not releasing personal information about our employees or members, subject to the important exceptions discussed below.

The most common reason for the release of your personal information is that you have provided your consent. Other reasons for releasing personal information may include our having a legal obligation, such as a court order. If we release information for any of these reasons, we keep a record of what, when, why and to whom such information was released. 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.

G. Safeguarding Information and Keeping Your Personal Information Confidential

Each and every one of the employees of EBFA is responsible for maintaining the confidentiality of all personal information to which they have access. EBFA keeps their employees informed about policies and procedures for protecting personal information and reinforces the importance of complying with them. All employees are required, as a condition of employment, to conform to these policies and procedures. EBFA 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.

H. Retention

We only keep your personal information for so long as we need it to meet the purposes set out in this Code. 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.

I. Privacy Officer

EBFA has a chief Privacy Officer to oversee privacy government, including policy, dispute resolution, education, communications, activity and reporting to all Trustees under the Electrical Industry Pension Trust Fund of Alberta, the Electrical Industry Education Trust Fund of Alberta, and the Electrical Industry Insurance Benefit Trust Fund of Alberta. The Chief Administrative Officer is the Privacy Officer and can be contacted at EBFA, 4211 – 95th Street NW, Edmonton, Alberta, T6E 5R6.