



Policy Title: Privacy Policy – IATSE Local 891 Employee Life and Health Trust

Effective Date: September 26, 2025

1. Purpose: This Privacy Policy outlines how the Employee Life and Health Trust (“the Trust”) collects, uses, discloses, and protects personal information of its members in accordance with the **Personal Information Protection Act (PIPA)** of British Columbia.

2. Scope

This policy applies to all personal information collected by the Trust from members for the purpose of administering and delivering life and health benefits.

3. Collection of Personal Information

The Trust collects personal information that is necessary to:

- Determine eligibility for benefits
- Administer life and health benefit programs
- Communicate with members regarding their coverage
- Process claims and payments
- Issue tax receipts and/or slips
- Comply with legal and regulatory requirements

Personal information collected may include:

- Full name
 - Date of birth
 - Contact information
 - Employment details
 - Dependent information
 - Medical or health-related information (as required for benefit delivery)
 - Social Insurance Number (SIN) – collected solely for the purpose of issuing tax receipts or slips, in accordance with applicable laws
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4. Use of Personal Information

The Trust uses personal information solely for the purposes for which it was collected, including:

- Benefit plan administration
 - Claims adjudication
 - Member support and communication
 - Tax reporting
 - Compliance with applicable laws and regulations
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5. Disclosure of Personal Information

The Trust may disclose personal information to:

- Third-party service providers (e.g., insurers, claims processors, administrators) who assist in benefit delivery
- Legal or regulatory authorities when required by law
- Authorized individuals acting on behalf of the member (e.g., legal representatives)

All third-party service providers are contractually obligated to protect personal information and use it only for the purposes specified by the Trust.

6. Role of Trustees and Third-Party Suppliers

The Trustees of the Employee Life and Health Trust do not directly collect, store, or manage personal information on Trust-owned systems. Instead, the Trust contracts with third-party suppliers to administer benefit programs and manage personal information on its behalf.

These suppliers are responsible for:

- Secure collection and storage of personal information
- Administration of benefits and claims
- Compliance with applicable privacy laws

The Trust ensures that all third-party suppliers are bound by strict confidentiality and data protection agreements.



7. Consent

The Trust obtains consent from members for the collection, use, and disclosure of personal information. Consent may be express or implied, depending on the nature of the information and the context of its collection.

Members may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Withdrawal of consent may affect the Trust's ability to provide benefits.

8. Protection of Personal Information

The Trust and its third-party suppliers take reasonable steps to protect personal information from unauthorized access, use, or disclosure. These measures include:

- Secure physical and electronic storage systems
- Role-based access controls
- Encryption of sensitive data, including SINS
- Staff training on privacy obligations
- Regular audits and reviews of privacy practices

9. Breach Notification Protocol

In the event of a privacy breach involving personal information:

- The Trust or its third-party supplier will assess the scope and impact of the breach.
- Affected individuals will be notified as soon as reasonably possible.
- The breach will be reported to the Office of the Information and Privacy Commissioner for British Columbia if required.
- Remedial actions will be taken to prevent future occurrences.

10. Retention of Personal Information

Personal information is retained only as long as necessary to fulfill the purposes for which it was collected and to meet legal and regulatory requirements. Once no longer required, personal information is securely destroyed or anonymized by the third-party supplier.



11. Access and Correction

Members have the right to access their personal information held by the Trust's third-party supplier and to request corrections if the information is inaccurate or incomplete. Requests should be submitted in writing to the Trust's Privacy Officer.

12. Contact Information

For questions or concerns about this Privacy Policy or the Trust's privacy practices, please contact:

Privacy Officer

Todd Rappitt

Executive Director, IATSE Local 891 Employee Life and Health Trust

Email: todd.rappitt@aga.ca, Tel: 905-477-7089

Approved and adopted by the Trustees as of September 26, 2025.

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